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19th August 2020

**RE: Carlow County Development Plan 2022-2028 Pre-Draft Consultation
SRA File Ref: 20/002**

A Chara,

The Southern Regional Assembly (SRA) welcomes the publication of the Pre-Draft consultation Issues Paper for the preparation of the Carlow County Development Plan 2022-2028 (CCDP) and the opportunity to consult with the Council under Section 11 of the Planning and Development Act 2000).

The SRA makes this observation in accordance with Section 27 A of the Act which obliges the Regional Assembly to make submissions or observations regarding a number of matters including:

- Policies and objectives in relation to national and regional population targets.
- Distribution of residential development and related employment with a view to:
 - Promoting consistency as far as possible between housing, settlement and economic objectives of the Draft Plan, Core Strategy and RSES.
 - Assisting in the drafting of the Core Strategy of the Draft Development Plan.
- Objectives of providing physical, economic or social infrastructure in a manner that promotes regional development through maximising the potential of the Region.
- Planning for the best use of land having regard to location, scale and density of new development to benefit from investment of public funds in transport infrastructure and public transport services.
- Collaboration between the planning authority and the Regional Assembly in respect of integrated planning for transport and land use and the promotion of sustainable transport strategies in urban and rural areas.
- Promotion of measures to reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to Climate Change.

The opportunity to engage through the pre-draft phase is also important in relation to Section 22 (A) (3) of the Act which requires that public bodies (including local authorities) consult with the regional assemblies, as appropriate, when preparing its own plans to ensure that they are consistent, as far as practicable, with national and regional objectives set out in the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES). Continued collaboration throughout plan development is welcomed.

The RSES was made on the 31st January 2020.

1.0 Overall Observation

The SRA highly commends the approach taken by the Council through the publication of the Issues Paper in association with the public consultation period.

The SRA commend the quality of the publication, its focus on key issues for the County and use of visual images. The issues and potential direction for change are clearly set out in the Issues Paper, which assists in effective engagement with the public and stakeholders on the direction for the next development plan.

At this stage of the process, the SRA intend to outline high level points. Appendix 1 provides a summary of some of the key RPOs that support the themes raised in the Issues Paper.

The final RSES should be consulted across the themes covered in the Issues paper as the Council moves to preparation of a Draft Development Plan. The RSES is available through the following link:

<http://www.southernassembly.ie/regional-planning/regional-spatial-and-economic-strategy>

2.0 Ensuring Consistency with the RSES

Under Section 10 (1 A) of the Act, the development plan shall include a core strategy which shows that its development objectives are consistent, as far as practicable, with national and regional development objectives set out in the National Planning Framework, the RSES and with specific planning policy requirements specified in guidelines under subsection (1) of section 28. The following key areas are identified for attention.

Chapter 2 sets out the Strategic Vision and Strategy for the RSES. Section 2.2 ‘The Strategy’ and the associated Strategy Statements and Key Enablers are particularly relevant including in the context of securing funding sources for the delivery of the Development Plan. It should be noted that Strategy Statements and RPOs are aligned to the National Strategic Outcomes of the NPF.

Chapter 3 references the settlement strategy and I refer in particular to Section 3.2 (Sustainable Place Framework) and Section 3.3 – A Tailored approach and the settlement typology set out in Table 3.2 including:

1. Cities – Metropolitan Areas
2. Key Towns – Section 3.5 including Carlow
3. Towns and Villages – Section 3.6
4. Rural Areas – Section 3.7, and
5. Networks – Section 3.8.

The Draft Plan and Core Strategy should reflect NPF and RSES priorities by positioning Carlow Town as a self-sustaining regional driver within the Southern Region with an inter-regional role relating to the adjoining Eastern and Midlands region and RPO 11 is particularly relevant in this context. The commitment of Carlow County Council to fulfilling these roles is clearly evident in the Issues paper, notably in the section on Regeneration, where the focus on urban regeneration and renewal is highlighted.

RSES objectives support active land management initiatives to deliver consolidation and compact growth of Carlow as a Key Town. The preparation of the *Carlow Town – Regeneration Vision and Implementation Strategy* (RVIS) to support implementation of URDF funding is a positive initiative which will further RSES objectives for town centre regeneration, including the use of under-used land for residential and mixed use development.

Carlow, therefore will play a critical role in underpinning the RSES and ensuring growth beyond the cities to the sub-regional level (RPO 14). While Local Authorities are supported in targeting growth of more than 30% in Large scale Key Towns such as Carlow, it is important to note that the nature, scale

and phasing of growth will be determined by Local Authorities through the Core Strategy and should be subject to capacity analysis.

In this regard, Local Authority initiatives to deliver infrastructure led development and retrofit physical and social infrastructure are critical to improving the quality of life for existing communities in the town and county, aligned with the principles of integrated land use and transport planning.

Through the RSES, Irish Water (IW) Investment Plans must align with the objectives and settlement strategy of the RSES and assist the strategic role played by Key Towns. Collaboration is required between IW and Local Authorities to agree phasing, water and waste water services to accommodate growth in a phased, sustainable manner.

After Carlow in its role as Key Town, the distribution of growth across the County's other towns, villages and rural areas is a matter for the Development Plan to address. The RSES does however seek prioritisation (see Section 3.6 Towns and Villages) in the growth allocation for settlements informed by guiding principles as set out under RSES Section 3.3. A Tailored Approach. These principles include:

- Existing scale of population, track record of performance, ambition and scope to leverage investment.
- Rate and pace of past development and extent to which there are outstanding requirements for infrastructure and amenities.
- Scale of employment provision, jobs to resident workers ratios and net commuter flows.
- An evidence base on the availability and deliverability of lands within existing built up footprints in the lifetime of the Development Plan (compliance with NPO 72 of the NPF).
- Extent of local services and amenities provided.
- Extent of sustainable modes of travel that can be encouraged.
- Accessibility as a service centre for remote and long-distance rural hinterlands.
- Environmental and infrastructure constraints.
- The appropriate density and scale of development relative to the settlement and location.
- Need for attractive, alternative options to rural housing within smaller towns and villages.

In Section 3.6 and in RPO 26, the RSES strongly supports the development of our rural areas, and recognises the loss of local services in villages and rural areas as a problem of regional importance and acknowledges the need for investment in towns and villages to reverse decline and attract enterprise growth. Initiatives supported by the RSES to assist renewal include:

- New homes in small towns and villages initiatives.
- Investment in town and village renewal initiatives to improve services and livability to attract population and enterprise growth.
- Coordination between Local Authorities, Irish Water and other stakeholders to deliver investment in water and wastewater treatment services (including Blue and Green infrastructure solutions).

Core Strategies in County Development Plans should identify areas under strong urban influence in the hinterlands of settlements. They will set an appropriate housing policy response to avoid ribbon and over-spill development from urban areas. New national guidelines for rural housing and development plans are awaited and will provide an important input to preparation of the Draft Development Plan when published together with a Housing Needs Demand Assessment (HNDA) to ensure a better balance of housing tenures to support revitalised towns and villages, achieve sustainable compact growth targets and protect the rural resource for rural communities.

The importance of our rural areas is highlighted throughout the RSES including for example rural economic development (see Section 4.5), and rural connectivity (see Section 6.3 RPOs 158 and 172) and we note the focus in the Issues Paper on strengthened rural economics and communities.

The Draft Plan will need to demonstrate priorities based on the above RSES requirements and principles. In setting out the Development Plan Core Strategy to 2028, adherence to NPO 72 (a) to 72 (c) will be required to differentiate between zoned land that is serviced and zoned land that is

serviceable within the life of the plan. When considering zoning lands that require investment in service infrastructure, planning authorities are required to include the reasonable cost estimates of delivering required services at both the draft and final plan stages.

3.0 Networks for Collaboration

The RSES recognises the importance of strategic transport and economic axis which can support economic collaboration between settlements. One such example identified as a key strategic issue in the Issues Paper is the potential inter-regional network opportunity along the M9 road and rail axis between Dublin, Carlow, Kilkenny and Waterford. The establishment of the Technological University of the South-East (TUSE) with its major campus locations at each end of this axis could, for example, be an opportunity to forge new opportunities for collaboration and innovation through the development of the new 3rd level entity.

The RSES also identifies the economic role played by smaller scaled settlements for their surrounding rural hinterlands and the opportunities for sharing assets and opportunities (see RPOs 28-30) between different settlements to drive rural economic growth.

The SRA support initiatives through the Development Plan to harness the potential of such networks.

4.0 Placemaking

The Issues Paper has addressed Placemaking and the focus on creating quality urban places and more sustainable communities is strongly supported for the Development Plan and aligns with the Sustainable Place Framework of the RSES (RPO 31).

The growth of compact settlements must be in tandem with infrastructure and facilities that enhances the unique identity and quality of life offer of different places. The need for closer alignment between where people live and work is signaled in the Movement and Transport Section of the Issues Paper and fully supported by RSES objectives.

Successful placemaking will require sustainable higher densities in our towns and villages to increase activity, support local services and support sustainable mobility.

The RSES supports 10 Minute Towns as a concept whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services. Our urban communities will need sufficient densities to realise the potential of a 10-Minute Town and its benefits for placemaking.

A strong emphasis on such initiatives in the Development Plan which links place-making policy to connectivity will be supported by RSES under:

- Section 3.9 Placemaking
- RPOs under Chapter 6 Connectivity
- Chapter 7 Quality of Life, RPO 176 “10-Minute City and Town Concepts”.

The SRA are a partner region in the EU Interreg Europe MATCH-UP project which aims to achieve significant improvements of modal interchange to foster low-carbon urban mobility. An outcome from the project which used Carlow as a case study is to set a framework of good practice to implement 10 Minute Town concepts successfully across Key Towns and other settlements in the Region. There are opportunities for Carlow and other settlements in the County to build on this work and to be leaders of good practice in our Region for sustainable 10-Minute Town concepts. The important role of Local Transport Plans to help achieve this is noted below in comments for Transport and Mobility.

5.0 Economy and a Smart Region

The Issues paper section on Economic Development, Enterprise and Employment sets out in clear terms the sectoral strengths in the County, the strategic importance of Carlow Town and the challenges including the large number of workers who commute out of Carlow.

The RSES Economic Strategy states that opportunities for economic growth will be achieved by supporting synergies between talent and place, building on identified assets to strengthen enterprise ecosystems and provide quality jobs, re-intensifying employment in existing urban areas, complemented by strategic employment growth in the right locations and diversifying local and rural economies.

The Issues paper identifies the direct involvement of County Council in supporting economic development as well as the role of regeneration and renewal in the sustainable development of towns. The RSES supports building a competitive, innovative and productive economy and greater economic resilience through the five principles that underline the RSES economic strategy (refer to Section 4.2 of the RSES) and which should be reflected in the economic policies of the Development Plan. These are:

- Smart Specialisation
- Clustering
- Placemaking for Enterprise Development
- Knowledge Diffusion and
- Capacity Building

It is important that the Development Plan's economic policies should integrate these principles to secure greater economic resilience across our Region so that opportunities for Smart Specialisation and Clustering can be harnessed. The Issues Paper highlights the important question of how to broaden the economy and to include the knowledge economy and hi-tech industries. This approach is very much supported in the RSES, which regard to Knowledge Diffusion (RSES supports a Learning Region, developing skills, talent and access to life-long learning) and Capacity Building (capacity to bid for funding and to respond to emerging challenges). The growth of IT Carlow and emerging TUSE will be a strong driver for Carlow in this regard and RPO 184 is explicit in its support for the establishment of TUSE.

The strength of indigenous industry and the key sectors identified the Issues Paper is supported by the RSES (Chapter 4).

The importance of tourism to the local economy in Carlow is highlighted in the Issues paper, attracting 79,000 overseas visitors annually and contributing €45 million and 1,215 full time jobs. In this regard is noted that the impact of COVID 19 on employment on the local economy is addressed in the Issues Paper in the section on Economic Development.

Complementing the Council's concern about the economic impact of COVID 19, the three Regional Assemblies published the COVID 19 Regional Economic Analysis to inform policymakers at a local, regional and national level of the extent of economic exposure and resilience across Ireland. This is consistent with the key principal of building economic resilience as supported in the RSES (RPO 75 Anticipating Economic Structural Changes).

This report developed a COVID-19 Exposure Ratio which represents the total number of its commercial units that were operating in the sectors likely to be worst affected by the COVID-19 outbreak, as a proportion of its total commercial stock as of September 2019. The higher this ratio is for an area, the more likely this area is exposed to significant economic disruption.

The report shows Carlow has a relatively low "COVID-19 Exposure Ratio", with 44.7 per cent of its commercial units operating in the sectors likely to be worst affected. The report indicated an Exposure Ratio for the main towns of Carlow (49%), Tullow (44.1%) and Muine Bheag (36%)

As the RSES marries spatial and economic planning, there is a strong emphasis on placemaking for enterprise development i.e. creating attractive places to attract skills and talent. The emphasis on placemaking for enterprise growth, addressed in the section on Design and Regeneration, is supported and should be further developed into the Draft Development Plan.

Supporting the delivery of actions under the South-East Regional Enterprise Plan, South-East Regional Skills Forum and in the Local Economic Community Plan are also important and should be supported through the CCDP 2022-2028.

Strengthened connectivity across the region (digital and transportation, especially with a focus on the efficient movement of freight) will enable interaction between regional economic drivers. This includes collaboration across the region between metropolitan areas, Key Towns and our network of towns and villages in addition to efficient freight movement between ports and airports (essential for an island open market economy). RSES Chapter 4 - A Strong Economy and Chapter 6 Connectivity both address the importance of digital and transport connectivity to underpin the Region's economic drivers.

The theme of Rural Development in the Issues Paper is strongly supported in the RSES. The RSES supports diversity in the rural economy and innovation in the County's network of rural towns, villages and rural areas to ensure economic resilience and job creation. RSES Section 3.5 highlights the presence of the Teagasc Head Office and Research Centre in Carlow. This is significant for the Agri-Food Sector in the region and for supporting decarbonisation in the agriculture sector.

Digital infrastructure and smart technologies are critical enablers for economic and social revitalisation. A Smart Region, embedding digital technology across many functions to improve our quality of life, is central to achieving the RSES vision. The RSES specifically seeks to develop the Smart Cities concept and develop good practices for towns and rural areas as part of a Smart Region. Such initiatives will enhance our Region's competitiveness, attractiveness and economic resilience. Actions arising from Carlow County Council's emerging Digital Strategy should be strongly supported through Development Plan policy.

6.0 Transport and Connectivity

In the Issues Paper section 'Movement and Transport' the emphasis on co-ordination of transport and land-use, public transport and local links is welcomed and supported.

RPO 151 "Integration of Landuse and Transport" and RPO 152 "Local Planning Objectives" underpin this approach. Successful integration of employment, housing and services with improved transport infrastructure is therefore a priority issue in Carlow, where significant growth will be targeted. The SRA support the role of Local Transport Plans to be prepared for Key Towns and other settlements (RPO 157).

In setting out the priorities for the road network in the County, it is noted that the Issues paper emphasises the importance of DMURS and that greater priority be given to accommodate the needs of pedestrians, cyclists and public transport. The RSES provides strong support for this approach at Section 6.3.3.2, which sets out the framework for Integration of Transport and Spatial policies, in the RPOs identified above and RPOs 160 to 163 regarding sustainable mobility.

The RSES also addresses the movement of freight and the Regional Assembly will engage with Carlow County Council later this year in the development of a Regional Freight Strategy. In this regard, the RSES emphasises the need to improve connections to the major ports at section 6.3.4.1 and in RPOs 140 to 144.

The delivery of cycle routes and greenway and blueway corridor projects are cited in the RSES for regional support but of equal importance from a regional perspective are smaller, cost effective measures to enhance walking and cycling permeability within and between our settlements, which have RSES support. RPO 174 especially is a strong support for Local Authority policy and actions to improve walking and cycling facilities within and between settlements.

RSES support for intra-regional rural connectivity and improvements to transport networks along the regions' national tourism corridors in Chapter 6 are important for Development Plan policy on strengthened rural connectivity. Road based transport is often the only viable mode for rural and peripheral locations. The County Development Plan should ensure investment in road infrastructure is also framed in economic, social, environmental and sustainable transport terms (the opportunity to strengthen rural public transport and bus networks).

7.0 Green Infrastructure

The SRA welcome the emphasis on green infrastructure and recommend expanding the reference to Green and Blue Infrastructure (GBI) and also Nature-Based Solutions (NBS). As indicated on page 47 of the Issues Paper, GBI should be a key concept of a local authority's Development Plan, informing actions and strategy around economic development and placemaking.

The SRA notes and welcomes the supports for SUDs and supports the work of Local authorities in the important role of collaborating with appropriate stakeholders and infrastructure delivery agencies to seek opportunities to appropriately design, deliver and manage green and blue infrastructure. An example of innovatively using GBI is the consideration of Integrated Constructed Wetlands as alternatives to waste water network connections for settlements with service capacity issues, including examples in County Carlow. (Ballinkillen and Hacketstown treatment plants included in the Constructed Wetlands of Ireland database)

The RSES promotes the recognition of 'services' provided by the natural environment at Section 5.2, where the term 'ecosystem services' is applied to the benefits derived from our ecosystem. The promotion of ecosystem services is evident in Urban Blue Corridors which can provide many benefits including: more effective management of urban flood risk; improved access, additional and more useable public open space, and improved biodiversity. The RSES promotes the guidance document, *Planning for Watercourses in the Urban Environment* published by Inland Fisheries Ireland which provides an integrated watercourse protection strategy. RSES also states that spatial planning can play a significant role in ensuring that the design of developments prevent and reduce diffuse pollution, including the use of Sustainable Drainage Systems (SuDS). Development Plan policies that support these good practices are strongly encouraged.

The SRA will welcome continued engagement with the Local Authority throughout the pre-draft stage to support these concepts and through RSES implementation and learnings from the EU Interreg Europe Blue Green City project. The SRA are a partner region on this project and through it, the SRA will seek to disseminate good practices and knowledge to improve GBI policy and improve the integration of GBI infrastructure in projects throughout the Region.

8.0 Climate Action

The direction of change signaled in the Issues Paper demonstrate that climate actions are central to policy proposals for – inter alia -people and places, economy and employment, transport and mobility. This is welcomed and should be reinforced in the draft Development Plan in a similar way to the approach of the RSES, which places a priority on Climate Action as part of the strategic vision for the Region.

The strong body of work established by the *Carlow Climate Change Adaptation Strategy 2019-2024* is highlighted in the Issues paper. This is noted and the SRA recommends the inclusion of policies to reflect this strategy and the climate action priority areas set out in Chapter 5 of RSES - for decarbonisation, climate resilience and resource efficiency as part of a Transition to a low carbon economy and society.

The SRA also recommend support for the initiatives of the Climate Action Regional Offices (CAROs). This will align with RSES support to the role of CAROs under RSES RPO 88 which states it is an objective to ensure effective co-ordination of climate action with the Climate Action Regional Offices and local

authorities to implement the Climate Action Plan, National Mitigation Plan and the National Adaptation Framework in the development and implementation of long-term solutions and extensive adaptation measures.

The SRA also recommend an emphasis on proposals for smart and innovative approaches to waste management, promotion of the Circular Economy and opportunities in Biomass.

9.0 Environmental Assessment

The Issues paper outlines how environmental considerations will be integrated into the review and preparation of the new County Development Plan through Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

The RSES is informed by extensive environmental assessments, contained in the SEA Statement, AA Determination and Natura Impact Report, which are available on the SRA Website. These assessments looked at environmental sensitivities for all parts of the Region and we would recommend that Carlow County Council review these document to inform the Council's own environmental assessments, including mitigation measures identified to address environmental sensitivities and constraints.

10.0 Inclusive Communities and Places

The SRA welcome the themes addressed in the Issues Paper section on Sustainable Communities and commitment to delivering community and social infrastructure and services for our existing and changing population profiles. Smart aging initiatives, access for all and support for volunteering and active citizenship are important themes to reflect in Development Plan policy.

The Issues Paper also addresses Education and Healthcare, which is supported by RSES policies for Healthy Communities at section 7.1.2 and for Childcare, Education and Lifelong Learning at Section 7.1.3. The focus in the Issues paper on the creative sector and support for arts and cultural facilities is noted and supported in the RSES at Section 7.2 – Culture, Heritage and the Arts and associated RPOs.

The RSES places a strong emphasis on education, skills development and life-long learning, with a key enabler being the establishment of an inclusive Learning Region. This designation builds on the success of Cork and Limerick as UNESCO Learning Cities and the potential to expand such initiatives to urban and rural centres across our region. Through access to learning for all, enterprise growth, social inclusion and work and job opportunities and our quality of life is enhanced. Development Plan policies in support of a Learning Region are encouraged.

11.0 Other Comments

Appendix 1 further aligns the main themes presented by the Issues Paper with specific RSES RPOs to support the preparation of the Draft Development Plan.

Conclusion

The SRA welcomes the pre-draft public consultation and commend the Planning Department for the attractive and accessible presentation of the Issues Paper, including the discussion of key themes and the framing of questions.

The Development Plan comes at a critical stage in the development of Carlow and it needs to provide a robust pathway to achieve the transformative change identified in the NPF and RSES.

The SRA supports the strategic focus and direction of change signaled across the main themes of the Issues Paper, which will meet the objectives of the RSES to enhance place making and quality of life in the County and Region so as to attract people, jobs and visitors. Recommendations are provided to assist and strengthen the approach under themes raised and to strengthen alignment between the regional and local tier in the draft plan.

In providing our observations, the SRA have had due regard to Section 27A of the Planning and Development Act 2000 (as amended).

As the pre-draft process advances and details emerge for the Core Strategy and the distribution of growth targets within this development plan cycle of 2022-2028, especially through Housing Need Demand Assessment, the SRA will have further recommendations at the appropriate stages.

Further engagement between the SRA as a key stakeholder and the Planning Department of Carlow County Council in the development of the Draft Development Plan is encouraged. The RSES team are available for future consultation and for any clarification required regarding this submission and during the pre-draft preparation stages.

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David Kelly
Director Southern Regional Assembly

Appendix 1

Alignment of Key Themes in the Issues Paper with RSES Regional Planning Objectives

Strategic Planning

- 1) The clear statement on the relationship between the County Development Plan and the NPF and RSES is welcomed including the framing of key strategic issues for Carlow.
- 2) Support for collaborations across settlements is welcomed. See under Section 3.8 (RPO 28 “Collaboration/Partnership”, RPO 29 “Rural Settlement Networks” and RPO 30 “Inter-Urban Networks as Regional Drivers of Collaboration and Growth”).

Population and Housing

- 1) Welcome reference to RSES objectives and targets in the section on the Core Strategy, which relates to RPO 3 – Local Authority Core Strategies.
- 2) A key message of the RSES under RPO 2 “Planning for Diverse Areas” is the strategic role played by all areas in the Region, both urban and rural, in achieving the set regional and national targets and objectives.
- 3) In planning for infrastructure led growth, note RPOs 11 – Key Towns and RPO 14 – Carlow Key Towns
- 4) Infrastructure investment objectives to support future growth are addressed under:
 - RPO 4 “Infrastructure Investment”;
 - RPO 11 “Key Towns”; and
 - RPO 26 “Towns and Villages”.
- 5) See also Chapter 8 RPOs:
 - RPO 208 “Irish Water and Water Supply”;
 - RPO 209 “Strategic Water Supply Projects”;
 - RPO 211 “Irish Water and Waste Water”;
 - RPO 212 “Strategic Wastewater Treatment Facilities”; and
 - RPO 213 “Rural Wastewater Treatment Programmes”.
- 6) Support for a sustainable place framework for towns and villages, including New Homes in Small Towns and Villages and co-ordination with Irish Water and other stakeholders to deliver investment in water and wastewater treatment is supported under RSES Chapter 3, Section 3.6 Towns and Villages and RPO 26.

Economic Development, Enterprise and Employment

- 1) The Issues Paper provides a welcome focus on the economic strengths and challenges for Carlow and these issues are recognized in chapter 4 of the RSES and, in particular section 4.2 – the Economic Strategy and RPO 40 – Regional Economic Resilience.
- 2) The RSES Economic Strategy supports building a competitive, innovative and productive economy through the following economic principles set out in chapter 4:
 - Smart Specialisation
 - Clustering
 - Placemaking for Enterprise Development
 - Knowledge Diffusion and
 - Capacity BuildingAlso refer to RPO 184 –establishment of TUSE, which will be a critical driver for Carlow
- 3) Reflect interaction between the County’s economic strengths/drivers with wider regional economic drivers, enabled through enhanced regional connectivity. These include collaboration with the Waterford Metropolitan Area and Kilkenny Key Town along the M9 road/rail corridor and connections to the Ports and Eastern Corridor. Refer to RSES Chapter 3, RPO 30 - Inter-Urban Networks and Chapter 4 Section 4.4 “Our Region’s Economic Engines”.
- 4) Reflect the strategic theme of enhanced connectivity to enable economic spread between regional engines, support for which is specifically addresses under RSES Chapter 6 at Section 6.3.3.1 and related RPOs

- 5) Tourism is addressed as significant contributor to the local economy and is supported under RSES Chapter 4, Section 4.6 Sector Development Opportunities, RPO 53 Tourism and RPO 54 Tourism and the Environment
- 6) Retail is addressed as a key sector and is supported under in RSES Chapter 4, Section 4.6 Sector Development Opportunities, RPO 55 Retail
- 7) Reference RPO 61 Health-Place Audit for Placemaking is a support for Towns/Town centres

Movement and Transport

- 1) Welcome reference to the co-ordination of land and transport planning integration, which is a key theme in RSES Chapter 6 which should be reflected in the settlement and placemaking strategy. In particular, the following RPOs address the themes and direction of change needed:
 - RPO 151 Integration of Land Use and Transport;
 - RPO 152 Local Planning Objectives;
 - RPO 157 Local Transport Plans; and
 - RPO 160 “Smart and Sustainable Mobility”;
 - RPO 161 “Smart Mobility”;
 - RPO 165 Higher Densities.
- 2) The Issues Paper addresses key roads issues and the RSES recognizes that Road based transport is often the only viable and sustainable mode for rural and peripheral locations. It is essential for “life lines” whereby smaller urban settlements and rural areas can access essential services, including health, education, retail, employment etc. and interchange with other public transport modes in key settlements through a safe and well-maintained road network. A high-quality road network is needed for successful rural public transport services, the movement of freight and emergency services. In larger urban areas, strategic road investment can facilitate a more efficient separation of economic and HGV movements, reduce congestion to improve the public realm, interchange facilities and active travel and allow new bus corridors to be established. Greater use of our road network for public transport, inter-regional bus services and local bus services, is an opportunity to encourage greater modal change. The County Development Plan should ensure investment in road infrastructure is also framed in economic, social, environmental and sustainable transport terms (bus and cycle networks). References in support of the strategic road network include:
 - RPOs 167 “National Road Projects”;
 - RPO 168 “Investment in Regional and Local Roads”;
 - RPO 171 “Bus”;
 - RPO 162 “Multi-Modal Travel Integration
- 3) The SRA note the benefits of walking and cycling networks are highlighted in this section of the Issues Paper. The sustainable concept is positive for placemaking and is supported in RSES Section 3.9 Placemaking and specifically in Chapter 7, RPO 176 “10-minute City and Town Concepts”.
- 4) Strengthened emphasis on greenway connections (are encouraged and supported by :
 - RPO 174 “Walking and Cycling”;
 - RPO 200 “Green Infrastructure and Recreation”;
 - RPO 201 “National Trails, Walking Routes, Greenways and Blueway Corridors”;
- 5) The RSES places a strong emphasis on the importance of the efficient movement of freight, maintaining and strengthening the TEN-T Network throughout the Region and maintaining and strengthening the strategic rail network is recommended. Important references include:
 - RPO 140 “International Connectivity”;
 - RPO 141 “Regional Freight Strategy”;
 - RPO 146 “High Quality International Connectivity-Ports”;
 - RPO 166 “Investment in Strategic Inter Regional Multi-Modal Connectivity to Metropolitan Areas and Economic Corridors”;
 - RPO 170 Rail

- 6) Recommended references for the Development Plan also include RSES Chapter 6 RPOs 158 Intra-Regional Rural Connectivity, RPO 159 Role of Transport in Access for All, RPO 172 Rural Transport and RPO 173 Tourism Corridors (services along the key national tourism corridors).

Infrastructure (Water, Wastewater and Environmental services)

- 1) RSES Chapter 3, Section 3.5 – Key Towns and Section 3.6 Towns and Villages, RSES sets out regional policy positions for infrastructure led growth of Key Towns (Carlow) and smaller settlements and seeks co-ordination between local authorities and Irish Water and other stakeholders to deliver investment in the sustainable development of water and waste water treatment services for rural towns and villages.
- 2) RPO 26 “Towns and Villages” specifically seeks under part (f) co-ordination between Irish Water and other stakeholders to deliver water and waste water infrastructure. Part (g) of the objective supports New Homes in Small Towns and Villages initiatives and seeks collaboration with Irish Water and stakeholders for serviced sites initiatives.
- 3) Chapter 9 Implementation and RPO 227 “Investment and Funding” supports Local Authorities and communities in achieving the drawdown of investment funds. The potential for funding streams to address services infrastructure that are part of, and add additionality to, an overall regeneration strategy for smaller settlements. Types of activities supported under the NPF Rural Regeneration Development Fund include *“Measures to address infrastructural deficiencies in relation to services, access, or other infrastructure that may be needed to support town or village regeneration”*.
- 4) Infrastructure investment across the different tiers of settlements are addressed under:
 - RPOs 4 “Infrastructure Investment”;
 - RPO 11 “Key Towns”; and
 - RPO 26 “Towns and Villages”.
- 5) See also in Chapter 8:
 - RPOs 208 “Irish Water and Water Supply”;
 - RPO 209 “Strategic Water Supply Projects”;
 - RPO 211 “Irish Water and Waste Water”;
 - RPO 212 “Strategic Wastewater Treatment Facilities”; and
 - RPO 213 “Rural Wastewater Treatment Programmes”.
- 6) In relation to SUDs, please refer to RPO 122.
- 7) In relation to Waste, the SRA recommend an emphasis on proposals for smart and innovative approaches to waste management and promotion of the Circular Economy (RPOs 107-108) and opportunities in Biomass (RPO 109).
 - i. Objectives in RSES Chapter 3 support smart technologies for energy efficiency in retrofitting initiatives (RPO 38 Retrofitting Initiative Priorities).
 - ii. Objectives in RSES Chapter 4 support the low carbon economy and bio-economy and include RPO 57 “National Policy Statement on the Bio-Economy”, RPO 58 “Bio-Economy and Rural Areas” and RPO 56 “Low Carbon Economy”. The case study of Tipperary’s initiatives in low carbon energy transition including its role as a European Model Demonstrator Region in the bio-economy are of benefit for example initiatives at a County level.
 - iii. Energy objectives connect with climate action, regional decarbonisation and renewable energy objectives under Chapter 5 Environment
 - iv. Objectives in RSES Chapter 8 support new energy infrastructure, delivery of networks, transition to new renewable energy technologies, the Integrated Single Electricity Market, renewable energy sources for data centres, indigenous renewable gas production, micro renewable generation local/community energy projects. Also refer to Section 8.2 “Strategic Energy Grid” and RPO 221 “Renewable Energy Generation and Transmission”.

References included in Chapter 5 Renewable Energy include:

- RPO 95 “Sustainable Renewable Energy Generation”
- RPO 96 “Integration of Renewable Energy Sources”
- RPO 97 “Power Stations and Renewable Energy”
- RPO 98 “Regional Renewable Energy Strategy”

- RPO 99 “Renewable Wind Energy”
 - RPO 100 “Indigenous Renewable Energy Production and Grid Injection”
 - RPO 101 “International Hub for Energy Innovation”
 - RPO 102 “Energy Research Funding”
 - RPO 103 “Interconnection Infrastructure”
 - RPO 104 “Energy Storage and Carbon Capture”
 - RPO 105 “Clean Electric Heat Technologies & District Heating”
 - RPO 106 “Future Proofing and Retrofitting”
- 8) In relation to Telecommunications and Broadband, this is addressed under the theme of digital infrastructure, Smart Cities and a Smart Region in RSES with relevant RPOs in Chapter 6 as follows:

- RPO 134 “Smart Cities and Smart Region”;
- RPO 135 “High Quality High Capacity International Digital Transmission”;
- RPO 136 “National Broadband Plan”;
- RPO 137 “Mobile Infrastructure”; and
- RPO 138 “Digital Strategies”.

Refer to RSES Chapter 6 RPO 135 “High Quality High Capacity International Digital Transmission” and Chapter 8 Section 8.2 “Strategic Energy Grid” and RPO 221 “Renewable Energy Generation and Transmission”.

Environment and Climate Change

- 1) Commitment to the integration of environmental considerations in the drafting of the County Development Plan welcomed. Refer to RPO 1 – Environmental Assessment, RPO 5 Population Growth and Environmental Criteria. Also refer to RSES SEA Statement, AA Determination and Natura Impact Report, which are available on the SRA Website.
- 2) Strong welcome and support for the focus on Transition to a Low Carbon Economy as an issue which cuts across all policy areas and for the promotion of the UN Sustainable Development Goals, to which all areas of RSES policy are related.
- 3) The RSES is committed to implement regional policy consistent with the Climate Action Plan 2019. Important RPOs in support of climate action and transition to a low carbon society and economy to reference include:
 - RPO 87 Low Carbon Energy Future;
 - RPO 88 National Mitigation Plan and National Adaptation Framework;
 - RPO 89 Building Resilience to Climate Change;
 - RPO 90 Regional Decarbonisation;
 - RPO 91 Decarbonisation in the Transport Sector;
 - RPO 94 Decarbonisation in the Agriculture Sector; and
 - RPOs 95-106 on Renewable Energy and Energy Efficiency
- 4) Supporting the initiatives of the Climate Action Regional Offices (CAROs) is strongly recommended. This will align with RSES support to the role of CAROs under RSES Chapter 5 RPO 88 which states it is an objective to ensure effective co-ordination of climate action with the Climate Action Regional Offices and local authorities to implement the Climate Action Plan, National Mitigation Plan and the National Adaptation Framework in the development and implementation of long-term solutions and extensive adaptation measures.

The RSES supports the development of Southern Region as a Carbon Neutral Energy Region.

Sustainable Communities

- 1) Welcome the themes addressed and commitment to delivering sustainable neighborhoods and community and social infrastructure, which should be backed up by the delivery of high-quality services for our existing and changing population profiles.
- 2) Retrofitting high quality infrastructure and services to communities who experienced past high rates of growth, but without corresponding physical and social infrastructure to a high standard, is considered a priority. Chapter 7 RPO 175 “Improving Regional Quality of Life through Infrastructure Led Planning” seeks to tackle such legacies.

- 3) Refer to RSES Chapter 7 Quality of Life which addresses many issues raised for supporting our communities and for reference:
 - RPO 176 “10-Minute City and Town Concepts”;
 - RPO 177 “Childcare, Education and Health Services”;
 - RPO 178 “Universal Health Services”;
 - RPO 179 “Diverse and Socially Inclusive Society”;
 - RPO 180 “Volunteering and Active Citizenship”;
 - RPI 181 “Equal Access”;
 - RPO 182 “Ageing Population”; and
 - RPO 183 Digital Strategies.
- 4) The RSES places a strong emphasis on education, skills development and life-long learning, with recognition of a Learning Region status. RPOs for reference include:
 - RPO 184 (support for higher education institutes and the new Munster Technological University);
 - RPO 185 “New School Facilities”;
 - RPO 186 “Life Long Learning”
 - RPO 187 “Education and Training”
 - RPO 188 “Regional Skills Forum”
 - RPO 189 Further Education and Training
 - RPO 190 Lifelong Learning and Healthy City Initiatives
- 5) Support for culture and arts in our communities is central to our quality of life. The development plan should integrate strong support to the culture and creative sectors (RSES Chapter 7 Section 7.2.2 and RPOs 191-194).
- 6) Support for parks, sports and recreation are essential for quality place making and our well-being and need strong policy support (RSES Chapter 7 Section 7.2.6 and RPOs 198-201).
- 7) The reference to the important role of the LECP in the co-ordination of local economic and community activity is noted and supported, reflecting the importance of the integration of the LECP with the County Development Plan and RSES
- 8) Reference RSES Section 7.1.1 Inclusive Communities and Places for further support on building resilient, sustainable communities and initiatives including implementation of LECP actions.

Heritage, Amenity and Landscape

- 1) The SRA welcome the theme and support the direction signaled where protection and enhancement of our built and natural heritage is important for our amenities and quality of life, essential to retain and attract population, enterprise investment and tourist visitors and support the local economy.
- 2) The SRA support initiatives by the Heritage Council including Collaborative Town Centre Health Checks which have a positive role in assisting town and village renewal initiatives.
- 3) Refer to RSES Chapter 3 Section 3.9 Placemaking, Section 3.11 Regeneration and RPO 34 “Regeneration, Brownfield and Infill Development” which includes support for regenerating and repurposing existing building stock in both urban and rural settings. RPO 26 “Towns and Villages” and RPO 38 “Retrofitting Initiative Priorities” also supports retrofitting infrastructure for energy conservation and re-use of our built assets to help achieve compact growth. Such initiatives should be balanced with heritage protection.
- 4) In relation to natural heritage and biodiversity, refer to RSES Chapter 5 Section 2.0 Protecting, Conserving and Enhancing Our Natural Capital, which supports ecosystems services which focuses on the way that the natural environment works as a system and the valuation of the natural environment to determine policy interventions to deliver net benefits to society. Payment for Ecosystems Services (PES) approaches are supported which brings economic thinking and a market mechanism into the provision of natural resources. Beneficial examples of good practice in our Region, including the Burren Programme, Duhallow Life, Mulkear River Catchment Project, BRIDE Project and the River Allow Catchment Management Group are cited.
- 5) Reference RSES Chapter 5 good practices and RPOs in support of the River Basin Management Plans, Flood Risk Management and Biodiversity and support for initiatives by the Local Authority Waters Programme.

- 6) Reference the following specific RPOs which are supportive of Local Authority actions in implementing measures to identify, conserve and enhance the biodiversity of our Region:
 - RPO 126 Biodiversity
 - RPO 127 Invasive Species
 - RPO 128 All-Ireland Pollinator Plan
 - RPO 129 Landscape
- 7) Also refer to RSES Chapter 7 and the following RPOs to protect and maintain our environmental and built heritage:
 - RPO 202 “Natural Heritage, Bio-Diversity and Built Heritage Assets”
 - RPO 203 “Revitalisation of Historic Cores”
 - RPO 204 “Better Public Access”
 - RPO 205 “Built Heritage”
 - RPO 206 “Architectural Heritage”
 - RPO 207 “Archaeological Investigation”.
- 8) In relation to Green Infrastructure, the strong focus on this the importance and benefits of Green Infrastructure highlighted in the Issues paper is strongly welcomed
- 9) In this regard, it is recommended expanding the reference to Green and Blue Infrastructure (GBI) and also Nature-Based Solutions (NBS).
- 10) The GBI theme aligns with Local Authority commitments to Climate Action and will feature in mitigation, resilience and adaptation strategies. GBI and water conservation are important links between mitigation and adaptation.
- 11) References supporting the theme to note include:
 - RPO 110 “Ecosystems Services”
 - RPO 117 “Flood Risk Management and Biodiversity”
 - RPO 122 “ Sustainable Drainage Systems (SuDS)”
 - RPO 124 “Green Infrastructure”
 - RPO 125 “Green Infrastructure Corridors”
 - RPO 126 “Biodiversity”

Design and Regeneration

- 1) Urban Design and Quality placemaking is at the core of RSES. Chapter 3 and Chapter 4 places a strong emphasis on quality placemaking principles to attract growth and regeneration of urban centres and enterprise growth (as identified it a key policy area also for the IDA to attract investment). Refer to RPO 31 Sustainable Place Framework and RSES Chapter 4, Section 4.7 Placemaking for Enterprise Development for guiding principles to assist initiatives
- 2) Tailored approaches to address Regeneration and Compact Growth are supported under RSES Chapter 3 - Section 3.9 Placemaking, seeks higher densities taking account of the need for variability and flexibility of local circumstances and an evidence-based approach.

References supporting the theme to note include:

 - RPO 34 Regeneration, Brownfield and Infill development
 - RPO 35 Support for Compact Growth
 - RPO 36 Land Development Agency
 - RPO 37 Active Land Management
 - RPO 38 Retrofitting Initiative Priorities
- 7) The strong support for Town and Village Development is welcomed and references to RSES policy in this area is noted and welcomed. Policy support for towns and villages, includes New Homes in Small Towns and Villages and co-ordination with Irish Water and other stakeholders to deliver investment in water and wastewater treatment is supported under RSES Chapter 3, Section 3.6 Towns and Villages and RPO 26 “Towns and Villages”.

Rural Development

- 1) The theme of rural development is strongly supported in the RSES. The RSES supports diversity, innovation and a network of viable rural towns and villages to ensure economic resilience and job creation. The Development Plan should reflect RSES Chapter 4 Section 4.5 Rural Development and RPOs 43-50 (addressing themes of the Common Agriculture Policy, Action Plan for Rural Development, digital infrastructure, rural partnership models, innovation hubs and diversification).