

Unique Reference Number: CLW-C79-26

Status: Submitted

Submission:

DRAFT CARLOW-GRAIGUECULLEN JOINT URBAN LOCAL AREA

PLAN 2024-2030

Author: Carlow Public Participation Network

Consultation:

Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030

Date Created: 23.01.2024 - 15:45

Cover Letter

Carlow Public Participation Network (PPN) was established in October 2014 in accordance with legislation in the Local Government Reform Act 2014 (Section 46).

The PPN is an independent organisation and is a framework for public engagement and participation with sustainability and wellbeing at its core. The aim of this structure is to facilitate and enable public organisations operating within the wider community to articulate and give voice to a diverse range of views, issues and interests within the local government system.

Currently there are 354 community groups across the three colleges - community and voluntary, social inclusion and environmental affiliated to Carlow PPN. The nature of these groups is extremely diverse. Representatives from the PPN membership are elected to boards/committees throughout County Carlow to represent the community voice and donate their time voluntarily. The PPN gives these local community volunteers a voice in local decision-making that directly affects them and their communities.

The PPN is the main channel through which Carlow County Council informs the community of the work it carries out. It is essential that any policies / decisions affecting the community be communicated through the PPN to ensure voices are being heard.

As part of the reform of local government, the report from the Working Group on Citizenship Engagement stated: 'the approaches to engage citizens in local authority policy formulation and service design must go beyond the range of communication, consultation and citizen participation mechanisms used in the past.'

In this regard, when Carlow County Council are undertaking any policy changes and are planning a consultative period, it is proposed that Carlow PPN be informed at the earliest possible stage so that information can be disseminated to the appropriate sector etc. Also, that information is communicated in clear and accessible 'plain English' language as set out by the National Adult Literacy Agency (NALA).

Community Consultation

Carlow PPN welcomes the opportunity to provide a submission on the Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024 - 2030.

Carlow PPN facilitated three in person public consultation meetings, (January 17th, 24th and 30th) of which one was held in conjunction with Carlow County Council Planning officials.

PPN members who were unable to attend were invited to feed in their observations by email.

A presentation by Carlow County Council Planning Officials was broken down into easier to understand chapters as set out in the Draft Paper and are referred to in some detail below.

Various elements from the Vision for Wellbeing for County Carlow have been drawn on for input into this consultation. It is essential that our communities be listened to for County Carlow to thrive. When people are heard, they not only feel valued which increases well-being and leads to a better quality of life, they also take ownership. Quality of life should be paramount for all citizens.

Carlow PPN looks forward to continually working with Carlow County Council to make our county a better place to live.

Observations:

Core Strategy and housing

Chapter: Volume
1

Carlow PPN Representatives are asking what lands are currently available for residential purposes? It is not clear on the maps as to whether lands zoned on the maps are in private or public ownership.

Clarification is required on any planning permission granted, and when or if the expiry date has lapsed on any zoned lands on the maps.

Requirement for appropriate mix of housing sizes, types and tenures in new developments (e.g. smaller families, ageing population, accessible homes etc.) - incorporation of refuse and community facilities

Potential to deliver higher densities at appropriate locations in the Town Centre - the Barrow track is at risk of becoming a more secluded place in delivering high density developments

ECONOMIC DEVELOPMENT, RETAIL AND TOURISM

Chapter: Volume
1

Retail - reduction of rent and rates for local retail businesses (not for huge corporate chains)

Promoting and protecting the role of the town centre - regeneration of the town centre, and that over shop units have a change of use for residential use

Revitalising vacant and derelict buildings in the town centre - we want to compliment Carlow County Council for their efforts and vision in this regard

Tourism - bring back the responsibility to Carlow County Council for street cleaning in Carlow town.

Site 9 marked on the map (sugar factory) is a great opportunity for a heritage/tourism opportunity as it is located right at the river (similar to the Hub in Graiguenamanagh for example).

Provision of more supports for smaller heritage projects

URBAN DESIGN, TOWN CENTRE AND REGENERATION

Chapter: Volume
1

From reading the plan - it appears disjointed, an interagency and collaborative approach is needed which isn't evident from reading the document.

An integrated approach is necessary to retain what is best about the town and its heritage, rather than piecemeal initiatives which do not gel together.

In regards to development of the barrow track - site no. 9 - we consider it preferable to expand the town out towards the areas which don't border the river - using best practice to develop appropriate multi storey accommodation with green and social spaces and resources.

Free up the land along the river for recreation, outdoor activities, nature and enjoyment.

Urban town centre and Regeneration

Chapter: Volume
1

PPN representatives suggested it be better to extend the town away from the current town centre.

There is concern at the risk of proliferation of developments at the Burren and Barrow rivers - a couple of points were made on this: 1. if the town is opened up to the river - then access to the river is blocked. 2. Flooding - the flood risk assessment says there is a 1 on 1,000 year risk, PPN reps are asking what grounds this is based on, i.e. the risk of flooding in the various areas. The allowance for climate change has not been adequately dealt with in terms of flood risk.

It would be prudent to develop the town and services required away from the river

Sustainable Travel and Transportation

Chapter: Volume

There needs to be a focus on the provision of public transport, and park and ride facilities for people.

Parking facilities that are being built, should be high rise and underground - not to use precious land space. Also, it was noted - active travel budgets shouldn't be used for constructing parking lots.

As electric cars are wider than normal cars, it was observed that parking spaces need to be wider.

There needs to be more parking for older people - there was a conversation about making disability parking spaces do an **additional** job, by changing them to serve 2 purposes by adding older person parking to those spaces.

Parking lots need pedestrian markings on the ground.

Bus stops need shelters and seating.

Additional secure bicycle parking is needed throughout the town.

The building of a bridge from Hanover Park to Mr Price car park, would be a great addition for access to the town centre.

The idea of 'old town, new town' - to expand the current boundary of the town to be further away from the town (as per NPH). The plans for 10 minute towns needs to be more holistic.

The PPN Reps also want to compliment the County Council for their excellent work on the Active Travel plans

Infrastructure, Environmental Services

Chapter: Volume

1

Environment and Sustainability

Everyone in the County of Carlow is enabled to live sustainably. We are leaders in actively caring for our environment and make wise use of all our assets; natural or made.

- All our citizens have access to continuous education and appropriate upskilling that supports sustainable living.
- Agencies and individuals are committed to protecting our biodiversity, water and air, ensuring we can enjoy these now and into the future.
- Our built environment is well-planned and constructed and designed to be sustainable. It has minimum impact on the natural environment, and we make creative use of our built and natural heritage, waterways and urban spaces.
- We are conscious consumers that minimise waste production at all points in production and consumption. We actively repair and reuse goods and materials and recycle wherever possible using accessible, up to date and efficient facilities.
- Sustainable transport options both public and private are available and accessible.

When construction is taking place near waterways - there needs to be more of a buffer zone - 10 metres is the current legislation but this falls short of EU legislation, policy and guidelines.

In this chapter the word 'support' is used - the document doesn't offer any information about what this means.

There are huge concerns about the effects of climate change and its impact - this has not been adequately accounted for.

Cleaning of Carlow Town: Carlow County Council should employ staff to provide regular street cleaning.

More support should be provided to residents associations and groups who clean and maintain their areas.

The County Council should employ more staff to enforce litter laws

Sustainable Communities

Chapter: Volume
1

Sustainable Communities – The JULAP should seek to promote and facilitate the development of sustainable communities through land use planning to support the provision of services and to accommodate community, leisure, recreational and cultural facilities. Development of public realms must be considered where disability, youth and minority groups are taken into consideration to ensure real inclusion and accessibility.

10 minute towns (see previous observation) - needs to provide for different needs and different people. Are the needs of people who live 10 minutes outside the 10 minute town centres going to be ignored

Clarification is needed on 'support' - who for, when, and how?

Areas in SAC's shouldn't be considered for anything other than conservation.

The language throughout the entire consultation is difficult and doesn't provide for engagement for the wider community - the use of 'plain english' would be welcome

Built Heritage

Chapter: Volume
1

Preservation of what is valuable: heritage, environmental and town planners need to sit down and talk to each other to be involved in a plan that everyone can live with.

PPN reps felt that it is evident in reading the consultation that people with different priorities input into the consultation documents - which read as though it doesn't link together as a cohesive plan.

Preserving our heritage is very important in attracting people to the county.

Plans for the town of Carlow should reflect the needs of the whole county.

Natural Heritage, Green Infrastructure and landscape

There is a need to protect designated sites of importance such as the River Burren and Barrow and oak Park. There is no indication that protection is being given to hinder zoning for plans for development at those locations.

Site 9 on the maps is zoned as enterprise and employment - PPN reps would like to support this site including Kelvin Grove and Strawhall Woodlawns for recreational facilities to increase our natural heritage and green infrastructure. These 3 sites should be considered for tourism and leisure.

It is positive to see changes in planting schemes around Carlow by the County Council staff - and it is very welcome to see plans for a plant nursery.

Climate Action

Climate Action should be highlighted in each chapter of the JULAP consultation in recognition of the SDG's.

Climate action is not a standalone issue - it needs to be incorporated into all policies, plans and decision making.

Conservation is not included in any of SAC's visible which appear in zoned areas on the maps.

In the JULAP, conservation is not recognised in the land use zoning - there are 2 significant SAC's - the Barrow and Oak Park.

When will the decarbonisation campaign begin as mentioned in the consultation document? (Point 11.3 in the documents)

The use of nature based solutions, green infrastructure and SUDS, needs clarity on what the aims are.

Food security needs more emphasis on producing local food and by supporting local growers.

PPN reps feel they have reframed this topic across the various chapters.

While we understand the need for national and regional policy, there is also a need to consider what are County Carlow needs, the culture, heritage and accessibility.

County Carlow needs to be more brave and creative about the priorities of Carlow and it's unique character to retain that and to work with it rather than being subsumed by national and regional policy.

other observations/feedback

General comments from PPN reps relating to the consultation process:

- On a positive note – the LA representation (and contracted services) at the open session in Carlow Library was good and their willingness to engage meaningfully with questions was positive.
- Only 30 people attended which was considered very inadequate, given the population of Carlow Town, almost 28,000 people.
- Was one consultation enough?
- Did people know about it? Methods of communication?
- Are people turned off by the lengthy documents (could we have an executive summary (or bullet points), highlighting the most relevant aspects of each of the 12 sections.
- Do people feel it's a waste of their time to make submissions – No evidence to suggest which (if any) changes are made based on submissions.
- PPN offer to assist with future consultations (acting as a support for the public).
- More hard copy documents should be made available – additional copies to the PPN Office, in Libraries, Council Offices, OPF, Schools, Parish centres, Citizens Information, Post Offices, St. Catherine's etc.
- In the zoning of the sugar factory site, having any industry that close to a SAC is a bad idea
- The 10 minute town needs a more holistic approach. Rather than travel time it should take into account the needs of the population and community e.g. bus doesn't pass by Sue Ryder's which is a purpose built and planned older residents site, but residents have to walk to a bus stop (apparently 10 mins away but those must be fit grannies).
- The language as a whole is not accessible while also not using environmental words.
- As most new cars are now roughly 1.8 m wide, it is now absolutely necessary to re-mark all parking spaces to a minimum of 2.5m wide or more as the present widths are no longer fit for purpose which could lead to claims for accidents and injuries which happen in these car parks. Also, older people find it very difficult to get in and out of their cars as many spaces are very narrow.

Documents Attached: No
Boundaries Captured on No
Map: