

17th October 2025

Carlow County Council,
Senior Executive Officer,
Planning Department,
Athy Road,
Carlow.

**Re: Proposed Material Alterations to Proposed Variation No. 2 to the Carlow County
Development Plan 2022-2028**

A chara,

Thank you for your authority's work in preparing the Proposed Material Alterations (material alterations) to the Proposed Variation No. 2 (proposed Variation) to the Carlow County Development Plan 2022-2028 (County Development Plan).

As Carlow County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and 31AM(2) of the Planning and Development Act 2000, as amended (Act) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. Planning authorities are advised by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will consider whether the plan has been made in a manner consistent with the recommendations of the Office and whether the plan sets out an overall strategy for the proper planning and development of the area concerned.

Overview

The Office acknowledges and welcomes the overall approach of your authority in the preparation of the proposed material alterations and in addressing the National Planning Framework First Revision 2025 (NPF) and the Regional Spatial and Economic Strategy for the Southern Regional Assembly area, in accordance with section 13 of the Act.

The Office welcomes, in particular, the inclusion of new tables 7.2 - 7.5 at section A.7.4.2 (MA 13), the updated Strategic Flood Risk Assessment (MA 33) and the inclusion of new table 6.2 at section A.6.6 (MA 11) to address Recommendation 2, 3 and 4, respectively, of the proposed Variation.

The Office also welcomes MA 2, MA 3, MA 26 and MA 34 to address Recommendation 1 of its submission in relation to residential land use zonings. The Office, however, recommends a minor amendment to include MA 29 in the list of residential sites at table 2.3 of the proposed Variation (MA 2) and consequential amendments to the Infrastructure Assessment (MA 34).

With respect to the material alterations to zone additional residential lands, the Office is satisfied that the lands are well located and accord with the principles of compact growth and sequential development.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out one (1) recommendation under the following key theme:

Key theme	Recommendation	Observation
Residential land supply	MA Recommendation 1	-

Residential land supply

The Office welcomes the inclusion of new table 2.3 in the proposed Variation (MA 2) and new table 2 in the accompanying Infrastructure Assessment (MA 34) identifying each residential zoned site, site area and housing yield.

The Office notes that the site that is the subject of MA 29 is not included in table 2.3 in the proposed Variation and table 1 and 2 of the accompanying Infrastructure Assessment. The Office considers that the proposed Variation and accompanying Infrastructure Assessment would benefit from a minor modification to include the site (MA 29) in terms of an assessment of the site's infrastructure, an evaluation of the land use, identification of the site area and potential housing yield.

MA Recommendation 1 – Residential zoning and Infrastructure Assessment

Having regard to the compact and sustainable growth of the town, and development and the co-ordination of housing delivery and infrastructure, and in particular to:

- NPO 101, NPO 102 and NPO 103 of the NPF to consider the serviceability of land zoned for development;
- the NPF Implementation: Housing Growth Requirements (2025); and
- section 4.4.2 of the Development Plans, Guidelines for Planning Authorities (2022) estimating requirements for sites to be zoned for residential,

the Office recommends that the Planning Authority includes a minor modification to:

- (i) table 1 of the accompanying Infrastructure Assessment to insert the site that is the subject of MA 29; and
- (ii) table 2.3 of the proposed Variation No. 2 to the Carlow County Development Plan 2022-2028 and table 2 of the accompanying Infrastructure Assessment to insert the site area and the potential housing yield for the site that is the subject of MA 29.

Summary

The Office requests that your authority addresses the recommendation outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected

members under section 13 of the Act must summarise this recommendation and the manner in which it will be addressed.

At the end of the process, your authority is required to notify this Office within **five working days** of the decision of the Planning Authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendations of the Office or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by this Office, then the Chief Executive shall inform the Office and give reasons for this decision.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,

A handwritten signature in black ink, appearing to read 'AM O'Connor'.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015