



22nd January 2026

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

Re: Proposed Variation No. 3 to the Carlow County Development Plan 2022-2028

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 3 (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 accordingly¹.

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.

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

¹ Chapter 5 of Part 3 of the Planning and Development Act 2024, which relates to the preparation of development plans and variations by planning authorities and the assessment by the Office, was commenced on 31st December 2025. However, section 69(2) provides that the variation of a development plan under section 13 of the Act of 2000 shall continue under that Act after the repeal of section 13 of the Act of 2000.

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 Variation 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 Variation and in addressing the National Planning Framework First Revision (2025) (NPF) and the Regional Spatial and Economic Strategy (RSES), for the Southern Regional Assembly area in accordance with section 13 of the Act.

With respect to New Residential zoned lands, the Office is satisfied that the lands are well located and accord with the principles of compact growth and sequential development. The Office recognises that the recently published proposed Variation no.4 to the County Development Plan addresses the NPF Implementation: Housing Growth Requirements (2025), including additional provision of 50 per cent, with which the quantum of available lands with capacity to deliver housing in the short to medium-term in the proposed Variation is consistent.

With regard to employment zonings, the Office recommends amendments to ensure consistency between the infrastructure assessment and employment zonings to demonstrate that the proposed zonings are underpinned by a robust evidence base.

The Office welcomes the preparation of a Local Transport Plan (LTP) and the inclusion of measures for different transport modes in the proposed Variation. Given the importance of reducing greenhouse gas emissions, to improve the alignment between transport and land use planning, the Office recommends the refinement of priority active travel measures in the proposed Variation.

The Office also recommends amendments in relation to flood risk to ensure that risk of flooding to people and property is avoided and managed.

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 three (3) recommendations under the following key themes:

Key theme	Recommendation	Observation
<u>Economy and employment</u>	<u>Recommendation 1</u>	-
<u>Sustainable transport</u>	<u>Recommendation 2</u>	-
<u>Flood Risk</u>	<u>Recommendation 3</u>	-

1. Economy and employment

The Office acknowledges that the proposed Variation provides details of existing development and land uses and available undeveloped land for strategic employment sites at section B.5.4.2, and references the infrastructural assessment at appendix V of the proposed Variation as informing the zoning of land for economic development.

As appendix V of the proposed Variation relates to residential zonings, the Office considers that an infrastructural assessment should be undertaken by the Planning Authority to inform the zoning of land for economic development in accordance with section 6.2.5 of the Development Plans, Guidelines for Planning Authorities (2022).

The Office notes that six sites are identified as strategic employment land in section B.5.4.2 of the proposed Variation. As the lands zoned Enterprise and Employment to the northeast of Tullow at Tullowphelim (c. 4.6 ha) are not identified in section B.5.4.2, and an infrastructure assessment has not been undertaken, the Office considers that a clear rationale for the zoning of this site is required, particularly given the peripherality of the site and potential infrastructure constraints.

Recommendation 1 – Employment zoning and Infrastructure assessment

Having regard to the location of Employment lands in locations that can support compact and sustainable development, and in particular to:

- NPO 19 of the NPF to identify and quantify locations for strategic employment development;
- RPO 62 of the RSES to identify locations for strategic employment development; and

- section 6.2.5 of the Development Plans, Guidelines for Planning Authorities (2022),

the Office recommends that the Planning Authority:

- (i) includes an infrastructure assessment to inform the zoning of employment lands demonstrating serviceability and consistency with sustainable planning principles;
- (ii) provides a clear rationale for the zoning of the site at Tullowphelim for Enterprise and Employment demonstrating the potential serviceability of the lands, in accordance with (i) above, and consistency with sustainable planning and sequential development principles; and
- (iii) if a clear rationale cannot be provided, map B11.1 Land Use Zoning should be amended to omit the Enterprise and Employment zoning at Tullowphelim.

2. Sustainable Transport

The Office welcomes the preparation of the LTP for Tullow, which has the potential to deliver an integrated approach to land use planning for the town. This is particularly important given the need to reduce car-based travel and promote more sustainable and active travel modes in the town, given its compact size and scale.

A key function of the LTP is to ensure the integration of land use and transport planning at a local level, in accordance with RPO 151 and 154 of the RSES. The Office recognises the proposed Variation includes indicative timescales for walking and cycling options. However, the Office considers that specific active travel measures should be appropriately prioritised to ensure the active travel measures support land use zoning objectives.

To this end, the priority active travel measures incorporated into the proposed Variation from the LTP should be reviewed to ensure that the projects are appropriately prioritised to improve the alignment between transport and land use planning over the plan period.

Recommendation 2 – Integration of transport and land use planning

Having regard to the need for integration of land use and sustainable transportation, and in particular to:

- NPO 107 and National Strategic Outcome 5 of the NPF to reduce car usage and increase the number of journeys taken by sustainable modes;
- NPO 93 of the NPF to improve air quality through integrated land use and spatial planning;
- RPO 151 of the RSES to apply the principles of land use and transport integration;
- RPO 152 of the RSES to deliver a high level of priority and permeability for walking, cycling and public transport modes;
- RPO 154 of the RSES to ensure integration of land use and transport planning; and
- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, the Climate Action Plan 2025 and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021),

the Office recommends that the Planning Authority:

- (i) identifies priority active travel projects to be progressed during the plan period together with timeframes; and
- (ii) includes policy support for the implementation of the proposed interventions, identifying connectivity for existing and proposed active travel networks and public transport networks for existing and proposed residential and employment lands and opportunity sites.

3. Flood risk

The Office welcomes the preparation of the Strategic Flood Risk Assessment (SFRA) in accordance with NPO 1 of the NPF and The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

The Office recognises the inclusion of the future scenario mapping at figures 4.7 – 4.11 of the SFRA, illustrating the potential future effects of climate change, and would welcome the addition of accompanying text to address the findings, adopting a precautionary approach in accordance with the Flood Guidelines.

The Office welcomes policy B8. P15 of the proposed Variation to manage flood risk in accordance with the SFRA and the strategies identified in relation to Agriculture zoned lands which may include one off housing. However, the Office considers that the strategies identified to manage flood risk should also include those relevant to less vulnerable land and buildings used for agriculture, in accordance with the Flood Guidelines.

Recommendation 3 - Flood risk management

Having regard to:

- NPO 78 of the NPF to take account of the potential impacts of climate change on flooding and flood risk;
- RPO 116 of the RSES to consider future appropriate land-use policies in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and
- the Flood Guidelines,

the Office recommends that the Planning Authority:

- (i) amends the Strategic Flood Risk Assessment (SFRA) to include text to address the findings of the future scenario maps, as per figures 4-7 and 4-11 of the SFRA, adopting a precautionary approach; and
- (ii) amends policy B8. P15 of the proposed Variation No. 3 to the Carlow County Development Plan 2022-2028 to include strategies to ensure that the risk to

Agriculture zoned lands is managed where it may include any less vulnerable agricultural uses in addition to one-off housing.

The Planning Authority is advised to liaise with the Office of Public Works to address this recommendation.

Summary

The Office requests that your authority addresses the recommendations 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 these recommendations and the manner in which they 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,

AM O'Connor.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015