



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

21st April 2026,

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

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

A chara,

Thank you for your authority's work in preparing the Material Alterations (material alterations) to Variation No. 3 (proposed Variation) to the Carlow County Development Plan 2022-2028 (County Development Plan). The proposed Variation relates to the Tullow District Town 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

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.

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 sustainable development of the area concerned.

Overview

The Office notes the overall approach of your authority in the preparation of the proposed material alterations to the proposed Variation.

The Office's submission made three recommendations on the proposed Variation at draft stage to ensure consistency with national and regional policy in relation to employment lands, integration of transport and land use planning and flood risk management.

In relation to Employment zoning and Infrastructural Audit, the Office welcomes the proposed material alteration which sees the inclusion of the site at Tullowphelim, under section B.5.4.2 the Strategic Employment Land.

Furthermore, the Office welcomes the response to Recommendation 3 of the Office's submission at draft stage and the Planning Authority's approach which revises the Strategic Flood Risk Assessment and section B.8.0, which amends policy B8. P15 to include strategies to ensure that the risk to Agriculture zoned lands is managed.

The Office also welcomes the updated core strategy table (table 2.3 B.2.3 Future Population and Housing Targets) and associated development policies and objectives.

In relation to the material alterations, the Office supports the proposed additional residential zoning under MA 16. These lands are well located within the existing built-up area and support the compact, sequential and sustainable growth of the town.

While it is important to ensure that sufficient land is zoned to meet housing needs, zoning should prioritise centrally located lands to support compact and sequential growth and be otherwise consistent with national and regional planning policy. The Office notes however that MA 18 and MA 19 propose residential zoning on peripheral lands to the southwestern approach and northern approach to the town, respectively both of which are located on the N81 where the 80kmph speed limit applies. Accordingly, the Office recommends that the proposed Variation is made without these two material alterations. Given the advanced stage of the statutory process, the Planning Authority may wish to consider the identification of alternative lands within the existing built-up area of the town as part of the development plan review.

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 zoning objectives	MA Recommendation 1	-

1. Residential zoning objectives

MA 18 proposes to rezone land on the southwestern periphery of the town from Enterprise and Employment to New Residential (6.96 ha). Similarly, MA 19 proposes to rezone land on the northern periphery from Agriculture to New Residential (8.67 ha). Both sites leapfrog more centrally located lands within the established built-up area of the town.

These proposed land use zonings would therefore undermine the delivery of compact, vibrant, and sustainable communities with convenient access to services and amenities, as envisaged by national and regional planning policy. Rather than reinforcing the town centre and making efficient use of serviced land, they would result in an unnecessary linear expansion along the N81 into the rural hinterland.

The Office further notes that both sites appear to be accessed off the N81, a national secondary route subject to the 80 kmph speed limit, which raises concerns in terms of the

safety and capacity of the national road network. The proposals are not materially consistent with the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) which require that development plans avoid the creation of any additional access points from new development to national roads to which speed limits greater than 60 kmph apply. In addition, the Planning Authority has not explained how the lands are to be accessed in a manner that is materially consistent with Regional Policy Objective (RPO) 140 and RPO 151 of the Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly which seek to sustainably maintain the strategic capacity and safety of the national roads, to ensure effective land transport connections, and to ensure that residential development will be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport.

These matters need to be considered in an integrated manner, to avoid a piecemeal approach to planning for the town. Accordingly, the Office considers that the Planning Authority should address MA 18 and MA 19 to ensure that new housing is delivered in appropriate locations that support compact and sequential growth, and maintains the strategic capacity and safety of the national roads.

Where additional residential zoning is required to ensure a sufficient supply of zoned land, more centrally located lands within the established built-up area may be more appropriately considered as part of the forthcoming development plan review.

MA Recommendation 1 - Material Alterations MA 18 and MA 19

Having regard to the principles of compact growth, sequential approach to zoning, and to maintain the strategic capacity and safety of the national roads and having considered the following:

- NPO 9 of the NPF relating to compact and sequential growth;
- RPO 35 of the RSES relating to the delivery of compact growth;
- RPO 140 of the RSES to maintain the strategic capacity and safety of the national roads;
- RPO 151 of the RSES to ensure that residential development will be carried out sequentially;

- Spatial Planning and National Roads Guidelines for Planning Authorities (2012) to avoid the creation of any additional access points from new development to national roads to which speed limits greater than 60kmph apply; and
- Development Plans, Guidelines for Planning Authorities (2022) that planning authorities adopt a sequential approach when zoning lands for development,

the Office recommends that the Planning Authority makes the proposed Variation without the following zoning objectives:

- (i) MA 18; and
- (ii) MA 19.

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 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
