

# **Chief Executive's Report**

**Submissions to:**

**Material Alterations to Proposed Variation 6 to the Kilkenny  
City and County  
Development Plan 2021**

**March 2026**





Kilkenny County Council  
March 2026

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Chief Executive

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## Executive Summary

The Material Alterations to the draft Ferrybank–Belview Framework Plan received **22 submissions** from statutory bodies, community groups, businesses, and residents. The feedback reflects strong interest in shaping the area’s future, with recurring themes around **traffic management, zoning strategy, and flood resilience**. The report summarises the submissions and observations received and provides a response and recommendation from the Chief Executive to each submission. An overview of key themes and issues is provided below:

### 1. Transport & Movement

- **Traffic management:** Concerns about congestion and safety at St. Mary’s Boys’ National School, with calls for dedicated set-down areas and car parking.

### 2. Zoning & Land Use

- **Zoning:** OPR commented on and made observations on the inclusion of details around specific Strategic Reserve sites in the Settlement Capacity Audit, and noted the need for clarifications on an employment site.
- **Essential infrastructure:** ESB advocated for the inclusion of electricity and utility infrastructure to be included as part of uses ‘Open for Consideration’ across appropriate zoning.

### 3. Flood Risk & Climate Resilience

- **Flooding and Strategic Flood Risk Assessment:** OPW and OPR highlighted several recommendations in relation to a review of flood risk and climate resilience.
- **Water and wastewater:** Uisce Eireann provided detailed site specific information on water and wastewater services.

# 1 Introduction

## 1.1 Purpose and contents of report

This Report forms part of the statutory procedure for the making of Variation 6 to the Kilkenny City and County Development Plan (KCCDP).

Kilkenny County Council is proposing to vary the Kilkenny City & County Development Plan 2021 - 2027. The variation (No. 6) proposes:

- To incorporate a Settlement Plan for Ferrybank/Belview into the KCCDP, as part of a new Volume 3, Settlement Plans,
- To make associated changes to Volume 1 to reflect this.

The Proposed Variation was placed on public display from the 18th July to September 19th 2025. 77 submissions were received to the Proposed Variation. The Chief Executive's Report on submissions received was considered at the Council meeting on the 15th of December 2025. A number of changes were proposed to the Proposed Variation, which constituted material alterations. At that Council meeting on the 15th of December 2025, the elected members resolved to prepare Material Alterations for public display.

The purpose of this Report is:

- To report on the written submissions/observations received in relation to the Material Alterations to Proposed Variation No. 6 to the Kilkenny City and County Development Plan (KCCDP) during the public consultation period which ran from the 30<sup>th</sup> of January 2026 to 27<sup>th</sup> of February 2026.
- To set out the Manager's response to the issues raised in the submissions/observations and;
- To make recommendations to the members on the issues arising from the consultation process.

The Report is now submitted to the Members, in accordance with Section 13(4) of the Planning and Development Act 2000 (as amended), for their consideration<sup>1</sup>.

## **1.2 Details of Public Display**

Material Alterations to the Proposed Variation were on public display from 30<sup>th</sup> of January 2026 to 27<sup>th</sup> of February. The items placed on public display were as follows:

- Public Notice
- Material Alterations to Proposed Variation 6
- Appropriate Assessment Screening report
- Strategic Environmental Assessment Screening report including Strategic Flood Risk Assessment

These documents were placed on the Consult.kilkenny.ie consultation website. Hard copies of the documents were on public display at the Planning Office, Kilkenny County Council, County Hall, John Street, Kilkenny Library, Ferrybank Belmont Road, Ferrybank, during library opening hours

Submissions could be made by:

- Online at [consult.kilkenny.ie](https://consult.kilkenny.ie)
- Written submissions to: Senior Planner, Planning, Kilkenny County Council, County Hall, John Street, Kilkenny.

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<sup>1</sup> Note: A planning process that commenced under the Planning and Development Act 2000 (as amended) continued to be governed by that Act despite the subsequent enactment of the Planning and Development Act 2025. This is due to the transitional provisions included within the 2025 legislative framework.

### **1.2.1 Public Notice**

The newspaper notice was published in the Kilkenny People on Wednesday 28<sup>th</sup> of January which included details of the public consultation generally. Details were further placed on the social media sites of Kilkenny County Council.

### **1.2.2 Consideration of Material Alterations to the Variation**

The members of the planning authority are required to consider the material alterations to the proposed variation and this Chief Executive's Report. If the Planning Authority, after considering a submission, observation or recommendation from the Minister, Office of the Planning Regulator or Regional Authority, decides not to comply with a recommendation made by such, it shall so inform the Minister, OPR or Regional Authority as relevant as soon as practicable by written notice and shall include the reasons for the decision. 7

Members shall consider the Proposed Material Alterations and the Chief Executive's Report and shall, no later than a period of 6 weeks after the Chief Executive's Report has been furnished, make or amend the Proposed Variation as appropriate.

In making this Variation, the Elected Members must consider Proposed Material Alterations to the Proposed Variation, the environmental reports and this Chief Executive's Report on any submissions/observations received and decide whether to make the Proposed Variation with or without the Proposed Material Alterations.

In making a variation to a development plan, the members are restricted to considering the proper planning and sustainable development of the area, the statutory obligations of a local authority and any relevant policies or objectives of the Government or any Minister of the Government.

## 2 Submissions Received

Submissions in relation to the proposed Variation could be made either:

- Online at <https://ourplan.kilkenny.ie> by following the link on the site, or
- In Writing to the Council's Planning Office

In total 22 submissions were received by Kilkenny County Council to the Material Alterations to Proposed Variation No. 6 to the Kilkenny City and County Development Plan (KCCDP), as set out below.

Ref No.	From
KK-C367-1	David Barton
KK-C367-2	Sean Phelan
KK-C367-3	Sean Phelan
KK-C367-4	TII
KK-C367-5	Health and Safety Authority
KK-C367-6	SCA Planning
KK-C367-7	OPW
KK-C367-8	Linda Hayes
KK-C367-9	Norma Doherty
KK-C367-10	David Clarke
KK-C367-11	Uisce Eireann
KK-C367-12	Kris Stokes
KK-C367-13	The Maritime Area Regulatory Authority
KK-C367-14	James Robinson
KK-C367-15	ESB
KK-C367-16	St Mary's Boys National School
KK-C367-17	Carmel Wemyss
KK-C367-18	IDA Ireland
KK-C367-19	Department of Education
KK-C367-20	OPR
KK-C367-21	NTA
KK-C367-22	Eamon, Maura, Edmund Doherty

To comply with reporting procedure in the legislation, the submission from the OPR (KK-C367-20) is dealt with first, followed by the other statutory consultees. The Planning Authority is required to address recommendations by the OPR to ensure consistency with the relevant policy and legislative provisions. In the 'Chief Executive's Recommendation' section any proposed new text to the Proposed Variation is shown in *italics* and deletions are shown as a ~~striketrough~~. Section 2.1 of the report deals with all the submissions from the statutory agencies, Government Departments and regulatory bodies. Section 2.2 deals with all other submissions to the Proposed Variation.

## 2.1 Section A: Submissions from Prescribed Bodies

Sub No.	From	Main Themes	Submission Summary	Chief Executive's Response & Recommendation
KK-C367-20	OPR	Zoning and Land Use Flooding and Strategic Flood Risk Assessment	<ol style="list-style-type: none"> <li>1. <b>Observation:</b> Having regard to the updated Settlement Capacity Audit(SCA)and the objective to provide for longer term expansion and the support of compact and sustainable development, and in particular to: NPO 101, NPO 102, and NPO 103 of the NPF to consider the serviceability of land zoned for development; RPO 4 of the RSES to align infrastructure investment with the spatial strategy of the RSES; and section 4.5.2 and 6.5.2 of the Development Plans, Guidelines for Planning Authorities (2022) to integrate infrastructure planning with new development, the Planning Authority is advised to: i) review the SCA to include the Strategic Reserve site included as part of Material Alteration No.12, namely:(a)site adjacent to Waterford Golf Course, (b)site at Mile Post, Rathculliheen, and ii)clarify in the updated SCA whether the Business Enterprise and Technology Parks zoning identified as site E-R is classified as Tier 1 or Tier 2.</li> <li>2. <b>Recommendation: The Planning Authority is required to determine whether Stage 3 FRA is required for,</b> sites 6, 8 and 9 Material Alteration No.12 (– As the sites are adjacent to watercourses for which there are no flood zones identified in the SFRA, it is not clear how land use zonings have been determined. The Planning Authority should determine whether Stage 3 Flood Risk Assessments are required, the sites specifically for lands located along both sides of watercourses outside of the Waterford Area for Further Assessment where no flood</li> </ol>	<p><b>Response</b></p> <ol style="list-style-type: none"> <li>1. Noted. Both sites are to be added to the SCA in the analysis tables and SCA map. The site adjacent to the Waterford Golf Course, which is proposed to be zoned strategic reserve, will be included in the SCA, and will be designated Tier 2. The site at Milepost, Rathculliheen, is designated Milepost Infill as opposed to Strategic Reserve. This site will be included in the SCA. Based on the assessment of water and wastewater services at the Milepost site, the area is well served with adequate pipe sizes in place. It will be designated Tier 1. For site E-R, the classification has been reviewed as per Table 5-4, and the site is Tier 2. This will be reflected in the SCA in Table 6-2.</li> <li>2. Noted, point 3. The zoning of sites 6,8,&amp; 9 of material alteration 12 has been reviewed.</li> </ol> <p>(i) Flood Zone extent mapping was included for the watercourses referred to in the SFRA that accompanied the Draft Plan. it was recognised in response to the OPW's previous comments that the extent of these Flood Zones may not have been easily visible at the resolution provided. due to the size of the Flood Zones within the context of the Plan area. The Flood Zone map was therefore updated, with higher resolution maps provided for inclusion alongside the Proposed Material Alterations (within Appendix 3 of the material alteration documents), not the main Proposed Material Alterations document). These updated versions of the Flood Zone maps,</p>

			<p>risk extents are shown on the flood zone mapping, and where necessary re-zone the lands to an appropriate use in accordance with the Flood Guidelines</p> <p>3. Material Alteration No.12, sites 7 and 10 (identified at Appendix 4 Maps of the proposed Variation) are proposed to be rezoned from Regeneration to New Residential and from Passive Open Space to Business, Enterprise and Technology Parks, respectively, which while not within present day flood risk extents, could be at risk of flooding in the future. If this is the case, the precautionary approach should be applied in relation to future flood risk, in line with the Flood Guidelines. The Planning Authority should determine if sites 7 and 10 of Material Alteration No.12 are at risk of flooding in the future and if so apply the precautionary approach in line with the Flood Guidelines.</p>	<p>which include flood extents for the water courses referred to in the submission, ( including those water courses that are within the vicinity of zoning map amendments 6, 8 &amp; 9 as part of Material Alteration no.12 ) will be included in the final SFRA to accompany the adopted Framework Plan.</p> <p>In addition to the above, the zoning of minor overlaps between Flood Zones A and B and Proposed Material Alteration No. 3 lands will revert back to Open Space, as was included under the original Proposed Variation.</p> <p>It is acknowledged that the catchments referred to in the submission were not modelled as part of the OPW's AFA for the National Catchment-based Flood Risk Assessment and Management (CFRAM) programme or as part of the OPW's National Indicative Fluvial Mapping (NIFM) programme. The CFRAM programme covered those areas, in each county, where, based on initial analysis, the flood risk was determined to be potentially significant from one or more sources of flooding. The NIFM programme covered catchments greater than 5km<sup>2</sup> in areas for which flood maps were not produced under the National CFRAM Programme. This is due to the size of the catchments in question – they are quite small. When delineating the flood zones associated with these catchments the following factors<sup>2</sup>, were considered.</p> <ul style="list-style-type: none"> <li>• Catchment size – the catchments are quite small;</li> <li>• Stream order, with the water bodies being lower order water bodies;</li> <li>• A digital terrain model derived from photogrammetry; generally sloping topography with well-defined valleys within which most of the water bodies are situated;</li> <li>• Relevant Planning history of the lands.</li> </ul>
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				<ul style="list-style-type: none"> <li>• In field observations, including sources of flooding, likely routes for flood waters and bridges/culverts, including Ballyvalla Bridge upgrade.<sup>3</sup></li> </ul> <p>Furthermore, Kilkenny County Council require: a detailed site specific flood risk assessment where flood risk may be an issue for any proposed development and any area within or adjoining flood zone A or B, or flood risk area, to be the subject of a site-specific Flood Risk Assessment appropriate to the type and scale of the development being proposed (City and County Development Plan Section 10.2.6.2 Development Management Requirements).</p> <p>The Variation (INF-DM1) requires that: “Where flood risk may be an issue for any proposed development, including pluvial flood risk, a flood risk assessment shall be carried out that is appropriate to the scale and nature of the development and the risks arising. This shall be undertaken in accordance with the Flood Risk Assessment Guidelines, including the sequential approach. Proposals for mitigation and management of flood risk will only be considered where avoidance is not possible and where development can be clearly justified with the Guidelines’ Justification Test.”</p> <p>Lands zoned Passive Open Space (where future built development would be significantly limited) has taken into account the Flood Zones and, taking a precautionary approach as outlined in the Guidelines, covers areas significantly beyond the Flood Zones. As per above, Flood Zones have been included.</p>
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<sup>3</sup> While the PFRA is no longer a reliable model for flood risk the Planning Authority did have regard to it in assessing flood risk.

				<p>3. As per point 2 above,. An overlay of Flood Zone and available future scenario mapping and adopted land use zoning will be prepared and included in final Plan/SFRA documents.</p> <p>Climate change considerations have been integrated into the existing provisions of the County Development Plan and into the Proposed Variation with which future developments will need to comply with<sup>4</sup>. Furthermore, the Council will add into Section 5.7 Land Use Zones of the Local Planning Framework: the following text to address the climate change “</p> <p><i>Uses on lands associated with Mid-Range and High-End NIFM/NCFHM future climate scenario risk areas, outside of Flood Zones A or B, shall be limited to less vulnerable and water compatible development. This limitation shall take primacy over any other related land use zoning provision. Detailed, site-specific Flood Risk Assessment will be required in these areas.”.</i></p> <p>See also response KK-C367-7. OPW</p>
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<p><b>Recommendation:</b></p> <ol style="list-style-type: none"> <li>1. Add site adjacent to the Waterford Golf Course to the SCA, and designate Tier 2. Add the Milepost Infill site to the SCA, and designate Tier 1. Ensure that Site E-R is designated Tier 2 across tables in the SCA.</li> <li>2. Update Flood Zone mapping in the in the SFRA to accompany the adopted variation. The maps were updated with higher resolution maps and appear in appendix 3 of the material alterations. This table responding to the OPW’s submission will be appended to the SFRA Report that accompanies the adopted Plan.</li> <li>3. An overlay of Flood Zone and available future scenario mapping and adopted land use zoning will be prepared and included in final Plan/SFRA documents. Furthermore, the Council will add into in Section 5.7 Land Use Zones of the Local Planning Framework the following text “ to address the climate change considerations. . Uses on lands associated with Mid-Range and High-End</li> </ol>			
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<sup>4</sup> Including Local Planning Framework Development Management Standard INF-DM4 Flood risk assessments shall apply the precautionary approach and shall consider climate change impacts and adaptation measures, including details of structural and non-structural flood risk management measures. The SFRA datasets and the most up to date CFRAM Programme climate scenario mapping, together with the allowances to be provided for future flood risk management provided in the OPW’s (2019) Flood Risk Management Climate Change Sectoral Adaptation Plan and the guidance on potential future scenarios contained therein, should be consulted by prospective applicants for developments in this regard

NIFM/NCFHM future climate scenario risk areas, outside of Flood Zones A or B, shall be limited to less vulnerable and water compatible development. This limitation shall take primacy over any other related land use zoning provision. Detailed, site-specific Flood Risk Assessment will be required in these areas.”

The Planning Authority therefore consider that in the assessment of sites 6,8,& 9 have been assessed using flood zone mapping to inform the proposed amendments and that a stage 3 flood risk assessment is not required.

<p>KK-C367-4</p>	<p>TII</p>	<p>Traffic management</p>	<ol style="list-style-type: none"> <li>1. Recommends that new Objective MAT 23 is changed as follows: ‘<i>Avoid <del>Limit</del> development access and intensification of access onto the National Road network, to maintain its safety and strategic transport function, in accordance with the provisions of official policy</i>’</li> <li>2. In relation to the inclusion of an Objective related to any future downstream River Suir crossing, TII advises that the position remains as set out in TII’s initial submission on Proposed Variation no. 6. In the interests of clarity, the special requirements of the tolling scheme (N25 Waterford Bypass PPP Scheme) and the potentially negative financial implications of same for the Exchequer will be required to be factored into considerations of any such additional downstream crossings at the appropriate time. TII acknowledges that the Chief Executives Report on Submissions on Draft Variation no. 6 notes TII’s recommendations in this regard.</li> <li>3. TII acknowledges the implications of the river crossing, and notes that rezoned port site E-I adjoins the N29, national primary road, at a location where TII’s records indicate a 100kph speed limit applies. TII considers that access proposals to the subject lands require clarification to ensure access proposals conform to the requirements of official policy concerning development access to national roads and to the N29</li> </ol>	<p><b>Response.</b></p> <ol style="list-style-type: none"> <li>1 Noted and agreed, objective wording will be updated to reflect this suggestion. This has also been covered under Section 12.11.7 of the KKCDP National Roads Policy.</li> <li>2 Noted. No amendment required.</li> <li>3 Noted. See wording change to Objective MAT23 as agreed in point 1 above. Furthermore, note also that this has been covered under Section 12.11.7 of the KKCDP National Roads Policy.</li> </ol>
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			Belview Port Access Strategy included in the Development Plan and Objective MAT25 included in Proposed Material Alteration no. 31.	
<b>Recommendation:</b>				
1. Update wording of Objective MAT23 to “Avoid <del>Limit</del> development access and intensification of access onto the National Road network, to maintain its safety and strategic transport function, in accordance with the provisions of official policy”				
KK-C367-5	Health and Safety Authority	Health and safety	1. The consultation distance for Grassland Fertilisers (Kilkenny) Limited is included on the Kilkenny City zoning map, but the consultation distances for Nitrofert Limited and Trans-Stock Warehousing and Cold Storage Limited do not appear to be included on any maps.	<b>Response:</b>  1. The consultation distances for Trans-Stock Warehousing Cold Storage Limited will be added to the zoning map. Nitrofert Limited is outside of the study area of the plan, and therefore will not be included.
<b>Recommendation</b>				
1. Add consultation distance for Trans-Stock Warehousing Cold Storage Limited to the zoning map.				
KK-C367-7	OPW	Flooding and Strategic Flood Risk Assessment	1. The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on Material Alterations to Proposed Variation No.6 to the Kilkenny City & County Development Plan 2021-2027 (Ferrybank - Belview). This submission is made specifically concerning flood risk management. Further submissions on the material alterations may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility. The National Planning Framework (2025) sets out National Policy Objective 78 to “Promote sustainable development by ensuring flooding and flood risk management informs place-making by:  a. <i>Avoiding inappropriate development in areas at risk of flooding that do not pass the Justification Test, in accordance</i>	<b>Response:</b>  1. Noted.  2. An overlay of Flood Zone and available future scenario mapping and adopted land use zoning will be prepared and included in final Plan/SFRA documents.  3. Noted. Flood Zone extent mapping was included for the watercourses referred to in the SFRA that accompanied the Draft Plan on display in the submission, however it was recognised in response to the OPW’s previous comments that an extent of these Flood Zones may not have been easily visible at the resolution provided due to the size of the Flood Zones within the context of the Plan area. The Flood Zone map was therefore updated, with higher resolution maps provided for inclusion alongside the Proposed Material Alterations (within

			<p><i>with the Guidelines on the Planning System and Flood Risk Management;</i></p> <p>b. <i>Taking account of the potential impacts of climate change on flooding and flood risk, in line with national policy regarding climate adaptation.”.</i></p> <p>2. <b>Flood Zone Map:</b> The OPW had previously commented that “It is difficult to assess if the sequential approach has been followed without the inclusion of Flood Zone mapping overlaid on the land use zoning mapping. Kilkenny County Council should provide such a map and consider its inclusion in Appendix 4 Ferrybank - Belview Framework Plan Maps”. This comment has not been addressed in the material alterations, while higher resolution maps of the flood zones have been provided these maps are still not overlaid with the land use zoning.</p> <p>3. <b>Flood Risk Assessment:</b> The OPW had previously commented “<i>Only a proportion of the plan area is located within the Waterford AFA. The watercourses within the AFA area were assessed as part of the National CFRAM programme. There are watercourses outside the AFA which have no flood risk extents shown on the flood risk mapping provided in the SFRA. While the National Indicative Fluvial Mapping (NIFM) programme produced mapping for watercourses greater than 5km2 that were not included in the National CFRAM programme, these watercourses appear to have not met the criteria for inclusion in NIFM.</i></p>	<p>Appendix 3, not the main Proposed Material Alterations document). These updated versions of the Flood Zone maps, which include flood extents for the water courses referred to in the submission, will be included in the final SFRA to accompany the adopted Plan.</p> <p>It is acknowledged that the catchments referred to in the submission were not modelled as part of the OPW’s AFA for the National Catchment-based Flood Risk Assessment and Management (CFRAM) programme or as part of the OPW’s National Indicative Fluvial Mapping (NIFM) programme. The CFRAM programme covered those areas, in each county, where, based on initial analysis, the flood risk was determined to be potentially significant from one or more sources of flooding. The NIFM programme covered catchments greater than 5km2 in areas for which flood maps were not produced under the National CFRAM Programme. This is due to the size of the catchments in question – they are quite small. When delineating the flood zones associated with these catchments the following factors<sup>5</sup>, were considered.</p> <ul style="list-style-type: none"> <li>• Catchment size – the catchments are quite small;</li> <li>• Stream order, with the water bodies being lower order water bodies;</li> <li>• A digital terrain model derived from photogrammetry; generally sloping topography with well-defined valleys within which most of the water bodies are situated;</li> <li>• Relevant Planning history of the lands.</li> <li>• In field observations, including sources of flooding, likely routes for flood waters and bridges/culverts, including Ballyvalla Bridge upgrade.<sup>6</sup></li> </ul>
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<sup>6</sup> While the PFRA is no longer a reliable model for flood risk the Planning Authority did have regard to it in assessing flood risk.

			<p><i>The lands along either side of these watercourses have been zoned as Passive Open Space, however it is unclear how the area of these zonings have been arrived at without flood extents. The zonings outside these Passive Open Space zonings are BETP – Business, Enterprise and Technology Parks, SR – Strategic Reserve, Agriculture, Public Utility and PFI – Port Facilities and Industry. Kilkenny County Council should review if stage 3 flood risk assessments are required to inform the land use zonings and the SFRA. An evaluation of site-specific flood risk assessments may also assist with establishing flood zones”.</i></p> <p>Kilkenny County Council require a detailed site specific flood risk assessment where there is an overlap of flood zones A and B and land use zonings. Without flood zones a site specific flood risk assessment may not be carried out for development that may be at a risk of flooding. Kilkenny County Council should review if stage 3 flood risk assessments are required to inform the land use zonings, the SFRA and for planning decisions.</p> <p>Zoning Map Amendment No. 6 as part of Material Alteration No. 12 proposes rezoning <i>Strategic Reserve as New Residential</i>. There is a watercourse in the vicinity of these lands which Kilkenny County Council have not produced flood zones for. <i>Residential</i> is highly vulnerable development and would not be appropriate in flood zone A and B.</p>	<p>Furthermore, Kilkenny County Council require: a detailed site specific flood risk assessment where flood risk may be an issue for any proposed development and any area within or adjoining flood zone A or B, or flood risk area, to be the subject of a site-specific Flood Risk Assessment appropriate to the type and scale of the development being proposed (City and County Development Plan Section 10.2.6.2 Development Management Requirements).</p> <p>The Variation (INF-DM1) requires that: “Where flood risk may be an issue for any proposed development, including pluvial flood risk, a flood risk assessment shall be carried out that is appropriate to the scale and nature of the development and the risks arising. This shall be undertaken in accordance with the Flood Risk Assessment Guidelines, including the sequential approach. Proposals for mitigation and management of flood risk will only be considered where avoidance is not possible and where development can be clearly justified with the Guidelines’ Justification Test.”</p> <p>Lands zoned Passive Open Space (where future built development would be significantly limited) has taken into account the Flood Zones and, taking a precautionary approach as outlined in the Guidelines, covers areas significantly beyond the Flood Zones. As per above, Flood Zones have been included.</p> <p>4. An overlay of Flood Zone and available future scenario mapping and adopted land use zoning will be prepared and included in final Plan/SFRA documents.</p>
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			<p>Zoning Map Amendment No. 8 and 9 as part of Material Alteration No. 12 proposes rezoning <i>Agriculture</i> and <i>Strategic Reserve as BETP – Business, Enterprise and Technology Parks</i>. There are watercourses in the vicinity of these lands which Kilkenny County Council have not produced flood zones for. <i>Agriculture and Business, Enterprise and Technology Parks</i> zoning types would be considered less vulnerable development and would not be appropriate in flood zone A.</p> <p>Zoning Map Amendment No. 8 and 9 as part of Material Alteration No. 12 proposes rezoning <i>Agriculture</i> and <i>Strategic Reserve as BETP – Business, Enterprise and Technology Parks</i>. There are water courses in the vicinity of these lands which Kilkenny County Council have not produced flood zones for <i>Agriculture</i> and <i>Business, Enterprise and Technology Parks</i> zoning types would be considered less vulnerable development and would not be appropriate in flood zone A.</p> <p>4. The OPW had previously commented that <i>“In line with the Guidelines, while Flood Zones are defined on the basis of current flood risk, planning authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives. The potential future flood extents included in Appendix II of</i></p>	<p>Climate change considerations have been integrated into the existing provisions of the County Development Plan and into the Proposed Variation with which future developments will need to comply with<sup>7</sup>.</p> <p>Furthermore, the Council will add into Section 5.7 Land Use Zones of the Local Planning Framework: the following text to address the climate change .</p> <p><i>Uses on lands associated with Mid-Range and High-End NIFM/NCFHM future climate scenario risk areas, outside of Flood Zones A or B, shall be limited to less vulnerable and water compatible development. This limitation shall take primacy over any other related land use zoning provision. Detailed, site-specific Flood Risk Assessment will be required in these areas.”.</i></p> <p>See also KK-C367-20 - submission from the OPR.</p>
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<sup>7</sup> Including Local Planning Framework Development Management Standard INF-DM4 Flood risk assessments shall apply the precautionary approach and shall consider climate change impacts and adaptation measures, including details of structural and non-structural flood risk management measures. The SFRA datasets and the most up to date CFRAM Programme climate scenario mapping, together with the allowances to be provided for future flood risk management provided in the OPW’s (2019) Flood Risk Management Climate Change Sectoral Adaptation Plan and the guidance on potential future scenarios contained therein, should be consulted by prospective applicants for developments in this regard

			<p><i>the SFRA might be shown overlaid with the land use zonings, to highlight any developments that could potentially be affected by climate change. Areas in the vicinity of the unmapped watercourses could also be potentially at risk of flooding in the future, however this could only be established through modeling of the watercourses".</i> This comment has not been addressed in the material alterations.</p> <p>No fluvial or coastal CFRAM future scenario mapping is available for the Plan area. The future scenario mapping that is currently available are the indicative OPW datasets produced as part of the National Indicative Fluvial Mapping (NIFM) and the National Coastal Flood Hazard Mapping (NCFHM).</p> <p>Zoning Map Amendment No. 7 and 10 as part of Material Alteration No. 12 proposes rezoning <i>Regeneration as New Residential</i> and <i>Passive Open Space as BETP – Business, Enterprise and Technology Parks</i>. While these lands are not in present day extents, they could be at risk of flooding in the future. If further information is required, please do not hesitate to contact the OPW (floodplanning@opw.ie).</p>	
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**Recommendation:**

1. No further amendment required.
2. An overlay of Flood Zone and available future scenario mapping and adopted land use zoning will be prepared and included in final Plan/SFRA documents.
3. Update Flood Zone mapping in the SFRA have been updated with higher resolution maps. This table responding to the OPW’s submission will be appended to the SFRA Report that accompanies the adopted Plan.
4. An overlay of Flood Zone and available future scenario mapping and adopted land use zoning will be prepared and included in final Plan/SFRA documents. Furthermore, the Council may consider the following for integration into the Local Planning Framework: “There are a number of instances where future climate scenario risk areas (see SFRA) overlap with land-use zoning objectives.

Uses on lands associated with Mid-Range and High-End NIFM/NCFHM future climate scenario risk areas, outside of Flood Zones A or B, shall be limited to less vulnerable and water compatible development. development. This limitation shall take primacy over any other related land use zoning provision. Detailed, site-specific Flood Risk Assessment will be required in these areas.”

KK-C367-11	Uisce Eireann	Water and wastewater	<p>1. In addition, both Proposed Material Alterations 33 and 34 reference the latest Capacity Registers published in August 2025. Our water supply and wastewater treatment Capacity Registers are published annually, and it is anticipated that updated Capacity Registers will be available shortly, and a version of these registers will be available on our website for developers and public access. Some additional site-specific comments are provided below based on a review of available GIS information. Site references are as per Appendix 4 of this Material Alteration. Site 2 –a long extension of approximately 600m would be required to connect to the public sewer network in Abbey Road; however, a private sewer may be located within the site. Third party agreements and diversions maybe required to develop the site. Site 9 – a long extension of approximately 600m would be required to connect the Strategic Reserve portion of the site to the 125mm diameter mater main located in Newrath road. Site 11 – along extension of approximately 700m would be required to connect to the public sewer network</p>	<p><b>Response:</b></p> <p>1 Site specific considerations on water and wastewater connections will be addressed at the development management stage of these sites. Site 2 is considered to be serviceable based on the planning history of the site, and is therefore assigned Tier 1 status. Based on the information provided by Uisce Eireann, Site 9 is a Tier 2 site, and Site 11 will be changed from not serviceable to Tier 2.</p>
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**Recommendation**

1. Change Site 11 (i.e., lands adjacent to Waterford Golf Course) will be from not serviceable to Tier 2.

KK-C367-13	MARA	Marine Planning	<p>1. Please be advised that as of the 31st of December 2025, the Maritime Area Regulatory Authority(MARA)is a prescribed body in accordance with Section 54 of the Planning and Development Act 2024 for the purposes of development plan review and the preparation of draft</p>	<p><b>Response:</b></p>
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			<p>development plans and in accordance with Section 58 in relation to the variation of a development plan. Please also note that in accordance with Section 58(18)(c) of the Act a copy of the adopted variation shall be sent to MARA within 1 week of the making of a variation of a development plan. MARA's functions, are set out under the Maritime Area Planning Act, 2021, and extend to the entire maritime area, from high water of ordinary tides to the outer limit of the continental shelf, encompassing the State's territorial seas and Exclusive Economic Zone. MARA facilitates a streamlined consenting process for projects in the maritime area and a route for projects to the planning system, by assessing applications for Maritime Area Consents (MACs).</p>	<p>1 KCC acknowledge the inputs of MARA, and note MARA's role as a prescribed body in the review of development plans from a coastal and marine planning perspective. No further amendment</p>
<p><b>Recommendation</b></p> <p>1. No amendment required.</p>				
KK-C367-15	ESB	Essential infrastructure	<p>1. Section 5.7 Land Use Zones – Material Alterations No. 8 &amp; 9: ESB fully supports the inclusion of 'Energy Park' as a Permissible Use under Business, Enterprise &amp; Technology Park and Port Facilities and Industry land use zonings. ESB strongly supports the vision of a Green Energy Hub, or Energy Park, at Belview Port, leveraging offshore wind energy and co-locating generation assets with large energy users, such as data centres. This will ensure that the Final Framework Plan will ensure alignment with evolving energy sector needs. In this regard, ESB recognises the clarity provided by footnote No. 7, which clearly defines the scope and purpose of an 'Energy Park'</p> <p>2. ESB recommends that the final Framework Plan include clearer alignment with the Kilkenny and Waterford Development Plans, both</p>	<p><b>Response:</b></p> <p>1 Noted. No further amendment required.</p> <p>2 The zonings contained in the framework plan will be reviewed to assess where utility and electricity infrastructure can be defined as 'Open for Consideration'. Utility and electricity network infrastructure will be included under 'Open for Consideration' in Agriculture, BETP, PFI, Public Utility zonings.</p>

			<p>of which provide for utility infrastructure/public service installation as an “Open for Consideration” use across multiple zones. To facilitate timely delivery of essential electricity infrastructure, ESB proposes that the Framework Plan broaden the application of the ‘Essential Infrastructure’ land-use designation, particularly in zones permitting buildings for public health, safety, and welfare. This change would ensure consistency with county-level plans, provide clarity for future planning applications, and support the efficient provision of critical infrastructure. ESB requests that the Framework Plan explicitly confirm that utility and electricity network infrastructure is considered ‘Open for Consideration’ across appropriate zones, in line with both the Kilkenny and Waterford Development Plans and national policy on infrastructure safeguarding</p>	
<p><b>Recommendation:</b></p> <ol style="list-style-type: none"> <li>1. No further amendment required.</li> <li>2. Add utility and electricity infrastructure as ‘Open for Consideration’ under Agriculture, BETP, PFI, Public Utility zonings.</li> </ol>				
KK-C367-18	IDA Ireland	Economic Development	<ol style="list-style-type: none"> <li>1. IDA supports all the proposed material alterations as they relate to our property at Belview.</li> </ol>	<p><b>Response:</b></p> <ol style="list-style-type: none"> <li>1. KCC acknowledge the support of IDA Ireland on the proposed material alterations in relation to the IDA’s property at Belview. No further amendment</li> </ol>
<p><b>Recommendation:</b> No amendment required.</p>				
KK-C367-19	Department of	Community	<ol style="list-style-type: none"> <li>1. The Department notes that proposed material amendment No. 6 proposes to amend Table 5-3 to increase the land zoned for new residential development from 40ha to 67.3ha, and to increase the minimum unit delivery on these</li> </ol>	<p><b>Response</b></p> <ol style="list-style-type: none"> <li>1. As part of the educational needs assessment conducted to inform this framework plan, KCC have identified that there are school capacity</li> </ol>

	Education		<p>lands from 1,000 units to 2,355 units. There is a difference between the total target of 1,469 units in Table 5.2 and the total number of potential units in Table 5.2, and the total number of 2,355 units in Table 5.3. The department recognises that the 1,460 figure is to align with the NPF until 2031 and therefore, the department is making this particular submission with reference to that target. Nevertheless, the 2,355 unit figure appears to be indicative of what may be delivered in the framework plan area over (as yet) an undefined time. If these units were to be delivered in their entirety, it would place significant extra pressure on school place provision requirements. Therefore, it is important that school place provision in the plan be reviewed if and when residential units delivered go beyond the targeted figure of 1,469 units as per table 5.2.</p> <ol style="list-style-type: none"> <li>2. The Department notes that proposed material amendment No. 22 to the section titled Educational Facilities to include additional text in relation to Special Education Needs (SEN) provision at primary and post-primary.</li> <li>3. The Department notes that proposed material amendment No. 31 to the section titled Movement and Active Travel Objectives includes additional text in relation to Safe Routes to School which includes a number of measures such as Strategic Walking Network, Cycling and Micromobility measures, Cycle Parking Strategy, Roads and Traffic Management Measures and Mobility Management Plans.</li> <li>4. The Department notes that proposed material amendment No. 32 to the section titled Movement and Active Travel Development Management Standards has been amended to include School Travel Plans.</li> </ol>	<p>constraints in the Ferrybank Belview area. Therefore, this plan includes the zoning of new school sites to facilitate the increased school provision. No further amendment.</p> <ol style="list-style-type: none"> <li>2. Noted</li> <li>3. Noted</li> <li>4. Noted</li> </ol>
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<b>Recommendation:</b> No amendment required.				
KK-C367-21	National Transport Authority	Transport	<p><b>Recommendations:</b></p> <ol style="list-style-type: none"> <li>1. Zoning map amendment no.9 relates to a proposed zoning change from 'Strategic Reserve' to 'Business, Enterprise and Technology Parks' at lands at Mullinabro, north of Newrath Road. Given the peripheral location of the subject lands, it is important that future development at this location can be supported by public transport services. Under the BusConnects Waterford Network Redesign Plan, Route 2 will travel along Rockshire Road and terminate just south of the subject site and will, therefore, provide a level of public transport access to the subject lands. However, given the scale of the lands and the sub-optimal existing walking and cycling environment in the area, it is submitted that Route 2 would better serve the subject lands if it could be embedded within any significant development at this site. Based on the above, it is requested that the Local Authority include an appropriate 'Development Objective' that requires consideration to be given to the provision of a bus turnaround facility with adequate layover space as part of any future development proposals for these lands, through liaison with the NTA. Such an objective can ensure that future trips to these lands can be facilitated by public transport</li> </ol>	<p><b>Response:</b></p> <ol style="list-style-type: none"> <li>1. Noted and agreed. A specific development objective for a bus turnaround facility with adequate layover space as part of any future development of lands at Mullinabro, north of Newrath Road.</li> </ol>
<b>Recommendation:</b>				
1. Add a development objective for bus turnaround facility with adequate layover space as part of any future development of lands at Mullinabro, north of Newrath Road.				

## 2.2 Section B: Other Submissions

Sub No.	From	Main Themes	Submission Summary	Chief Executive's Response & Recommendation
KK-C367-1	David Barton	Heritage	1. Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950.	<p><b>Response:</b></p> <p>1. This submission does not specifically relate to any of the material alterations. No further amendment.</p>
<p><b>Recommendation:</b></p> <p>1. No further amendment.</p>				
KK-C367-2 / KK-C367-3 <sup>8</sup>	Sean Phelan	Zoning and Land Use	1. Update GIS error to change zoning of lands identified as Trailblazers Dogpark, Newrath, Co. Kilkenny, from 'Active Open Space' to 'Passive Open Space'.	<p><b>Response:</b></p> <p>1 This GIS error will be addressed to reflect 'Passive Open Space' zoning at the Trailblazers Dogpark, Newrath.</p>
<p><b>Recommendation:</b></p> <p>1. Update GIS error to reflect 'Passive Open Space' zoning at the Trailblazers Dogpark, Newrath.</p>				
KK-C367-6	SCA Planning	Zoning and Land Use	1. Main concern identified in relation to proposed Material Alteration 19 occurs in the preamble explanatory text leading to the insertion of the amended Objective BPIA4. The primary concern is that the preamble indicates Kilkenny County Council seeks the retention of the building. It is noted this wish is not carried into proposed Objective BPIA4 and, if this preamble remains unaltered, will lead to confusion when assessing any application on the remaining Glasshouse lands, now to be zoned BPI - to facilitate Port related industry. The	<p><b>Response:</b></p> <p>1. The preamble reflects the protected status of the Glass House structure. While acknowledging the submission reference to ICOMOS, the Glass House is a legally protected by its inclusion in the Kilkenny record of protected structures. In the interest of clarity, the wording of the preamble in proposed material alteration 19 will change to:</p> <p><i>"The Glass House is an important structure both for its architectural qualities and its very early historic associations</i></p>

<sup>8</sup> Note, KK-C367-2 and KK-C367-3 relate to the same submission, which was submitted twice.

			<p>most appropriate recommended conservation practice, as set out in the ACP Report, is conservation by record. Therefore, it is requested that the text below be altered to state – It is an objective of the Planning Authority to seek conservation of the building by record in accordance with ICOMOS protocols.</p> <p>2. The area of land owned by SEPS around the Glasshouse is relatively small. There are no woodland trees, garden or landscape features on the Glasshouse demise that would instigate a woodland management plan in connection with a planning application submitted in accordance with the proposed primary zoning PFI and the associated land use matrix. Therefore, it is requested that the proposed BPIA4 local objective reproduced below should be further amended to delete the words ‘Glasshouse and’.</p> <p>3. The zoning change from RAB to PFI at Glasshouse is noted and welcomed. The associated land use matrix, Material Alteration No.9, is noted and welcomed</p>	<p><i>with Irish glass making <del>as the site of the origin of the Waterford area’s renowned glass-making industry.</del> and its connection with the Penrose Family (Waterford Crystal). It is an objective of the Planning Authority to seek the retention of the existing structures in accordance with best conservation practice.. It is the policy of Kilkenny County Council to permit appropriate uses on the site subject to the retention of the features of the garden, the integration of the proposal with its character and the adoption of a woodland management plan.</i> The objective as written provides for flexibility to provide commercial use while protecting biodiversity as per the National Biodiversity Plan and securing a sustainable future for the existing ruins.</p> <p>2. For the interest of clarity BIAP4 will be split into two objectives, A for the Glass House, and B for Knockmullan House</p> <p>a. BPIA4A: Permit appropriate uses on the site of Glasshouse subject to the retention <i>of the ruins in accordance with conservation best practice and, the integration of the proposal with its character, and the adoption of a woodland management plan.</i></p> <p>b. BPIA4B: Permit appropriate uses on the site of Knockmullan House subject to the retention <i>of the features of the garden, the integration of the proposal with its character, and the adoption of a woodland management plan.</i></p>
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				<p>It is noted that while the submission states there is no formal tree planting on the site, the associated conservation report does suggest there is significant vegetation and trees around the site.</p> <p>3. Noted. No amendment required.</p>
<p><b>Recommendation:</b></p> <ol style="list-style-type: none"> <li>1. Change wording of the preamble to the Glass House</li> <li>2. Split Objective BPIA4 into separate A and B objectives.</li> </ol>				
KK-C367-8	Linda Hayes	Traffic management	<ol style="list-style-type: none"> <li>1. Requests a specific objective to develop a dedicated set down/drop off area and car park adjacent to St. Mary's National School. Urges designated set-down / drop off or parking facility for St Mary's Boys National School. Reports traffic safety risks and risks to the health and safety of students due to lack of parking options. Notes that an alternative is needed due to challenges posed by potential use of the Primary Care Centre car park.</li> </ol>	<p><b>Response:</b></p> <ol style="list-style-type: none"> <li>1. St Mary's School is identified in the draft LTP/ UFP as a priority area for a future Safer Routes to School (SRTS) project. A number of options will need to be considered in the development of the project including but not limited to: the availability of off-street parking assets within the vicinity of the school site, the need to improve of crossing facilities on Belmont Road, a need to reduce conflict with other road users and the need for consistency with other objectives of the Strategy including the improvement the Belmont Road area, prioritisation of active travel and bus proposals and road safety proposals. The provision of set down and car park beside the school would be an inefficient use of urban land and could impact on the much needed expansion of educational facilities on this site and therefore not in accordance with the proper planning and sustainable development of the area. See proposed material alteration number 27. Recommendation for no change to the proposed material alteration.</li> </ol>

<b>Recommendation:</b> 1. No further amendment required.				
KK-C367-9	Norma Doherty	Traffic management	1. Requests a specific objective to develop a dedicated set down/drop off area and car park adjacent to St. Mary's National School. Urges designated set-down / drop off or parking facility for St Mary's Boys National School. Reports traffic safety risks and risks to the health and safety of students due to lack of parking options. Notes that an alternative is needed due to challenges posed by potential use of the Primary Care Centre car park.	<b>Response</b> 1. See submission KK-C367-8.
<b>Recommendation:</b> 1. No further amendment required.				
KK-C367-10	David Clarke	Traffic management	1 Requests a specific objective to develop a dedicated set down/drop off area and car park adjacent to St. Mary's National School. Urges designated set-down / drop off or parking facility for St Mary's Boys National School. Reports traffic safety risks and risks to the health and safety of students due to lack of parking options. Notes that an alternative is needed due to challenges posed by potential use of the Primary Care Centre car park.	<b>Response</b> 1 See submission KK-C367-8.
<b>Recommendation:</b> 1. No further amendment required.				
KK-C367-12	Kris Stokes	Traffic management	1. Requests a specific objective to develop a dedicated set down/drop off area and car park adjacent to St. Mary's	<b>Response</b> 1. See submission KK-C367-8.

			National School. Urges designated set-down / drop off or parking facility for St Mary's Boys National School. Reports traffic safety risks and risks to the health and safety of students due to lack of parking options. Notes that an alternative is needed due to challenges posed by potential use of the Primary Care Centre car park.	
<b>Recommendation</b>				
1. No further amendment required.				
KK-C367-14	James Robinson	Traffic management	1. Requests a specific objective to develop a dedicated set down/drop off area and car park adjacent to St. Mary's National School. Urges designated set-down / drop off or parking facility for St Mary's Boys National School. Reports traffic safety risks and risks to the health and safety of students due to lack of parking options. Notes proposed material alteration number 27 on transport objective 6, and states that this option has been investigated previously and is not feasible due to risks to vulnerable patients. Requests that Council considers allowing access from the main road, at the front of the school/site adjacent to the school, to facilitate the development of a set down/drop off area and car park, given that the option of accessing the site via the PCC car park has already been ruled out	<b>Response</b> 1. See submission KK-C367-8.
<b>Recommendation:</b>				
1. No further amendment required.				

KK-C367-16	St Mary's Boys National School	Traffic management	<p>1. Requests a specific objective to develop a dedicated set down/drop off area and car park adjacent to St. Mary's National School. Urges designated set-down / drop off or parking facility for St Mary's Boys National School. Reports traffic safety risks and risks to the health and safety of students due to lack of parking options. Notes that an alternative is needed due to challenges posed by potential use of the Primary Care Centre car park.</p>	<p><b>Response:</b></p> <p>1. See submission KK-C367-8.</p>
<p><b>Recommendation:</b></p> <p>1. No further amendment required.</p>				
KK-C367-17	Carmel Wemyss	Traffic management	<p>1. Requests a specific objective to develop a dedicated set down/drop off area and car park adjacent to St. Mary's National School. Urges designated set-down / drop off or parking facility for St Mary's Boys National School. Reports traffic safety risks and risks to the health and safety of students due to lack of parking options. Notes proposed material alteration number 27 on transport objective 6, and states that this option has been investigated previously and is not feasible due to risks to vulnerable patients. Requests that Council considers allowing access from the main road, at the front of the school/site adjacent to the school, to facilitate the development of a set down/drop off area and car park, given that the option of accessing the site via the PCC car park has already been ruled out</p>	<p><b>Response:</b></p> <p>1. See submission KK-C367-8.</p>

<b>Recommendation:</b> 1. No further amendment required.				
KK-C367-22	Eamon, Maura, Edmund Doherty	Environment	1. Suggests that the proposed bridge from proposed ring road passes through farmland at Bellevue with environmental value. Construction of the new route would reduce field size, resulting in less productive farming, and pose hazards due to machinery and livestock having to cross the road. Furthermore, the proposed route would pass through a flood plain and some fields of unimproved grass land - the former forming part of the Lower River Suir SAC (site code:002137) which has high ecological value. The proposed route would also disrupt the valuable network of hedgerows on the farm	<b>Response:</b> 1. See Proposed Material Alteration No. 29. For both the Downstream River Crossing and Newrath Link Road, the route (s) are indicative only for the purposes of the Strategy. Each proposal in the Plan will be subject to their own separate appraisal process that will need to consider environmental, cost and safety issues such as those raised in the submission before any alignments are finalised. See TII submission KK-C367-4. No change to the proposed material alteration.
<b>Recommendation:</b> 1. No further amendment required.				

### 3 Summary of Recommendations of the Chief Executive

It is recommended that the Members of Kilkenny County Council adopt Proposed Variation no. 6 to the Kilkenny City and County Development Plan 2021 - 2027, in line with the Chief Executive's Report, with the proposed Material Alterations.



**Lar Power**  
**Chief Executive**

