

Pre-Draft Issues Paper

Kilkenny County Development Plan 2020-2026

On behalf of Marie Brannigan



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1 Introduction

This submission is made on behalf of Marie Brannigan, Freshford Road, Kilkenny in response to the notification by Kilkenny County Council (KCC) of its intention to review the current Kilkenny City and Environs Development Plan 2014-2020 and to incorporate it into the Kilkenny County Development Plan 2020-2026 and in direct response to the published Pre-Draft Issues Paper.

The purpose of the pre-draft issues paper is to identify a number of inter-related and strategic planning themes and associated issues that require consideration in the review of the current Development Plan. The strategic planning themes raised in the Issues Paper have informed the preparation of this submission, particularly with regard to the following identified matters:

- Population: The issues paper identifies that Kilkenny City's rate of growth is outstripping the county at present and it is targeted to grow to over 29,000 by 2026. An appropriate amount of land is required in the right locations to meet housing and population targets. Other land uses such as employment and commercial are included in this consideration. The right type and mix of housing is required to reflect the different requirements of the population at the various stages of their lives.
- Economic Development and Employment: The issues paper raises matters in relation to the type of employment possible in the City and County over the new plan period and the need for additional and appropriately zoned land at the right locations. There is a need to provide for local jobs to reduce commuter driven development. This will occur through growing existing sectors and establishing new sectors.
- Transportation and Mobility: Generally, the issues identified in the issues paper relate to the provision of more sustainable development patterns through improvements to where development is located and to choices in relation to what mode of transport is used to travel to and from destinations.
- Social, Community and Cultural Development: The issues paper identifies that there is an ongoing need for additional community facilities and improvements to existing resources including for health centres, primary care centres and hospitals. It is noted that nursing homes and residential care homes should be integrated wherever possible into the residential areas of towns and villages where residents and staff can avail of reasonable access to local services.

The main points of this submission are as follows:

- Kilkenny City has a total population growth forecast of 28,200 up to 2022 (including headroom) with the population expected to exceed 29,000 by 2026. With an average household size of 2.57 and an average density of 30 units per hectare this results in a residential land requirement of 27 hectares. This land has been zoned and provided for in the City and Environs Development Plan 2014-2020 and additional land is now required for the long term housing and development needs of the City.
- A further set of residentially zoned land, in addition to 'Phase 2 Residential' will be required to cover the period from 2020-2026 under the life of the new County Development Plan, 'Strategic Reserve' Lands are considered to be the most suitable in this regard.
- A strategic reserve is defined as follows in the current City Environs Plan:
"These areas will provide for the long term expansion of the city, following substantial progress being made in the implementation of the Western Environs and Loughmacask areas. Local Area Plans, or appropriate planning framework documents will be prepared for the areas of Strategic Reserve as required in the longer term. The total area of the strategic reserve lands is 262ha."
- It would appear these land banks are next in line for land rezoning although this is not particularly specified for any particular use in the current Kilkenny City and Environs Development Plan.
- Given the existence St. Luke's and Aut Even Hospital's in close proximity to each other it is considered that the "strategic reserve" land to the north west of the town would be suitable for some kind of aged care/nursing home facility with a residential land use





going forward. The residential land use could cater for people of retirement age who are downsizing and for low-density residential sites where there appears to be a latent demand in Kilkenny City.

2 Strategic Planning Context

2.1 Project Ireland – National Planning Framework 2040

Project Ireland 2040 was announced in February 2018 to provide details for the new national planning and capital expenditure plans. The plans outlined a number of details in relation to population increases as well as the necessary infrastructure and services provisions to support the future population of Ireland.

The following is an extract from Strategic Objective 6 of the National Planning Framework 2040, which is related to the environment:

*“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, **increased residential population** and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.”*

Objective 33 also states:

“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”

The NPF states that Ireland’s future homes will:

- *be located in places that can support sustainable development - places which support growth, innovation and the efficient provision of infrastructure, are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change;*
- *be delivered in our cities and larger towns (where large scale housing demand exists), where homes and the appropriate supporting services can be delivered more efficiently and effectively at less cost to the State in the long-run, and*
- *still be located in our smaller towns, villages and rural areas, including the countryside, but at an appropriate scale that does not detract from the capacity of our larger towns and cities to deliver homes more sustainably.*

In the interests of the policy for regional convergence, adequate housing provision is required in the south east region that will accommodate future levels of employment in areas that are accessible to a range of services and amenities. Kilkenny City is considered to be well placed to provide residential accommodation generation given the projected levels of population growth and the available lands within the City area, particularly in the Western Environs.

2.2 Regional Planning Guidelines for the South East Region 2010-2022

The current Regional Planning Guidelines for the GDA were adopted on 26 July 2010. The RPGs inform and direct the City and County Development Plans of each of the Councils in the South East Region to provide a strategic planning context for development over the lifetime of the Plan.

The Guidelines state the following with regard to development in Kilkenny:

“Kilkenny City and Wexford Town have been designated in the National Spatial Strategy as Hubs. They are strategic urban centres that support and are supported by the Gateway and reach out to wider rural areas of the region that the RPGs are targeting for significant levels of growth. In addition, the County Towns are recognised as critical elements in the structure for realising balanced regional development, acting as a focus for strengthening their own areas...”



...

An immediate review of services capacities and the availability of zoned and serviced land by each planning authority will be required to assess the potential of these centres to accommodate anticipated and targeted levels of growth in the short to medium term.”

It is considered that the current Development Plan review process is the appropriate time to identify lands suitable for future development that generally complies with the development objectives of the Regional Planning Guidelines and can provide development capacity for Kilkenny City. This will include the provision of adequate land for an increase in population in Kilkenny City and Environs from 26,512 in 2016 to an approximate population of 29,300 in 2026 (approximately a further 2,800 inhabitants). There is over 130 hectares of land zoned as “Phase 2 Residential” in the current Kilkenny City Development Plan, however a further strategy is required for a situation where Phase 2 Residential lands cannot come forward for development due to inability to provide adequate infrastructure or an absence of development appetite by the landowner. Additional lands should also be provided for high quality low-density housing at appropriate locations.

2.3 **Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities 2009**

It is acknowledged that much of the substantive policy content of the ‘Residential Density Guidelines 1999’ is carried forward into the above guidelines in that it remains government policy to encourage more sustainable urban development through the avoidance of excessive suburban development and through the promotion of higher densities in appropriate locations.

The Guidelines state that the increase of population within city or town centres with their range of employment, recreation, educational, commercial and retail uses can help to curtail travel demand; therefore, these locations have the greatest potential for the creation of sustainable patterns of development. In this regard, the Guidelines do not place any upper limit on the number of dwellings that may be provided on a town or city centre site, subject to compliance with certain safeguards.

2.4 **Sustainable Urban Housing: Design Standards for New Apartments**

Under Section 28 of the Planning and Development Act 2000 as amended by the 2015 act, Ministerial guidelines were published in December 2015 titled “Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities”. The guidelines seek to ensure the implementation of the national standards set in 2007 and for the first time, requires that the majority of apartments in an apartment scheme exceed the minimum floor area standard. These standards have been now updated in March of 2018.

The guidelines preclude local authorities and those responsible for preparing statutory plans from specifying conflicting standards in their statutory plans.

The Guidelines state that identification of the types of locations in cities and towns that may be suitable for apartment development, will be subject to local determination by the planning authority, having regard to a number of broad descriptions in relation to proximity and accessibility considerations. For example, sites within 10-15 minute walking distance from a city centre or employment hub and high capacity public transport such as DART or LUAS is considered to be a central/accessible urban location. Locations within 10-15 minutes of a principle town and high capacity transport is an intermediate urban location.

Strategic Reserve lands in the western environs of Kilkenny City can be considered to be in a “Peripheral and/or Less Accessible Urban Location” which is defined as follows:

“Such locations are generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net), including:



- Sites in suburban development areas that do not meet proximity or accessibility criteria;
- Sites in small towns or villages.

The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors.

While the provision of apartments may not be required below the 45 dwellings per hectare net density threshold, they can allow for greater diversity and flexibility in a housing scheme, whilst also increasing overall density. Accordingly, apartments may be considered as part of a mix of housing types in a given housing development at any urban location, including suburbs, towns and villages.”

The above details highlight the potential for a range of housing types on lands that are within 10-15 minutes walk of the City Centre that may increase the density possible on currently vacant lands should they be considered suitable for residential land use in the future.



3 Local Planning Context

The Kilkenny City and Environs Development Plan 2014-2020 is the relevant statutory planning document in the review of the land use strategy for Kilkenny City.

3.1 Kilkenny City Development Plan - Core Strategy

The core strategy contained within the City and Environs Development Plan, identifies the following population targets for Kilkenny up to 2022:

Table 3.1 Adjusted Regional Planning Guidelines figures						
	2011 Actual	2012	2014 ²⁷	2016	2020	2022
Kilkenny County	95,419	96,873	99,781	105,598	109,802	111,903
Kilkenny City	24,423	24,723	25,323	25,800	27,400	28,200

The population targets are linked to projected housing growth as follows:

Table 3.3: Final land allocation Table 2011 - 2020						
Location	Population allocation	Housing land requirement (Ha)	Existing zoning (Ha)	Proposed zoning ³³		Housing yield
				Phase 1	Phase 1 LD	
Kilkenny City & Environs	2977	57.9	62.23	52.58	10.33	1,680 ³⁴

The above table highlights the number of residential units that are forecast to be required during the lifetime of the current City and Environs Development Plan (up to 2020) on what are known as Phase 1 lands.

Development on what are known as Phase 2 lands will only be considered when 75% of Phase 1 lands are committed and supporting infrastructure is available. As seen under the planning the following section, a large number of units have been proposed on various portions of phase 1 zoned lands, particularly within the Loughmacask and Western Environ LAP Lands.

Planning Approvals on Phase 1 Lands

Reg. Ref. 17/704

Permission was granted in 2017 for the extension of duration for a 55 unit development at Callan Road, Kilkenny, which is to the south of the subject site and within the Western Environs LAP area. This illustrates a level of residential development identified under previous land use strategies is coming forward for development and further zoned land will be necessary elsewhere within Kilkenny City.

Reg. Ref. 04/1757

Permission was granted in 2004 for a neighbourhood centre/mixed use commercial development including 40+ dwellings at Callan Road, Kilkenny, which is also within the Western Environs LAP area. This illustrates further land within the Western Environs being released for development.

Reg. Ref. 10/15

A ten year permission was granted in 2011 a major mixed use retail/commercial, office residential, café/bar/restaurant and ancillary uses on a site of 18.25 hectares at Tullaroan Road/Bonnetstown Road, which is located to the south of the subject site and within the Loughmacask Local Are Plan lands. The development included 267 residential units and further



illustrates the residential zoned lands in Kilkenny City that are currently being taken up for development.

Reg. Ref. 10/10

A separate ten year permission was granted in 2011 a residential scheme on a site of 12.37 hectares at Tullaroan Road/Bonnetstown Road, which is located to the south of the subject site and within the Loughmacask Local Area Plan lands. The development included 112 no two storey residential units and represents an additional land bank previously zoned for residential development that will be developed and occupied most likely between now (2018) and the end of the lifetime of the next County Development Plan (2026).

The build out of Phase 1 lands means that Phase 2 lands will now start coming forward for development and additional land will be required for the longer term development of Kilkenny City. There is a total area of 131.57 hectares of phased two zoned lands designated in the Kilkenny City area with the majority of these lands in the western environs of the City.

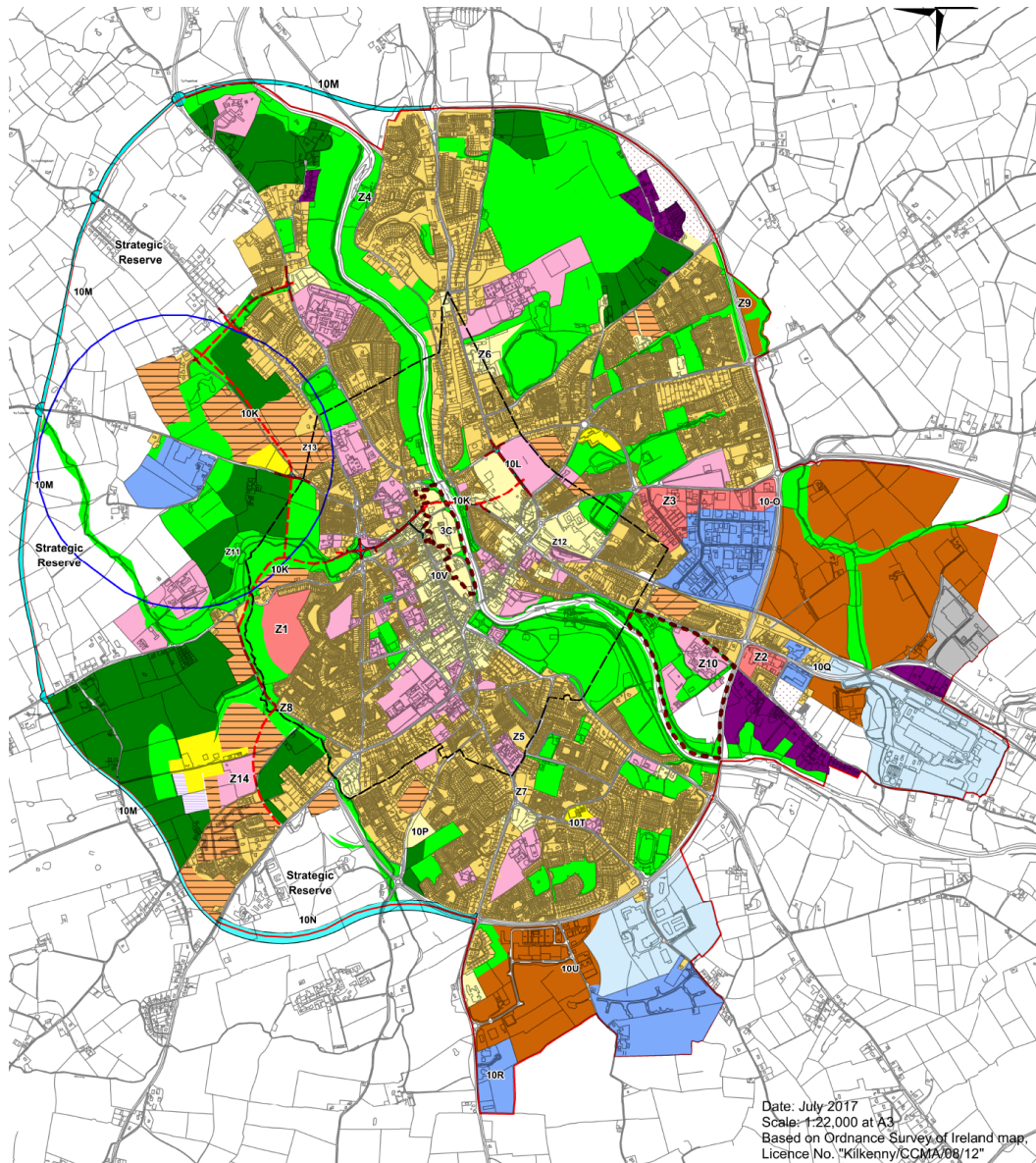
The City Development states the following:

“The analysis of housing activity since 2008 showed that there is an underlying demand for housing on large sites in the city which is at present satisfied by people building in the countryside close to the city. In order to reflect that demand for housing on larger sites at lower than normal densities it is proposed to continue with the low density zonings at selected locations in the environs of the City. An additional area for low density zoning is identified at the Sion Road (1.95ha) and an additional area along the old Dublin road (0.69 ha).”

This highlights that there is not just a need for general housing provision but there is also a demand for lower density, high quality housing developments on larger sites within the city. The strategic reserve lands to the west of the City are the logical location for this type of development. Accommodation for the elderly in the form of retirement villages or nursing homes will also be required with an ageing population and this may be ideally suited to locations that are easily accessible from existing health care facilities such as private and general hospitals.

Zoning

We note there are three separate areas of land designated as a “Strategic Reserve” as shown on the Local Area Plan Map below.



Strategic Reserve Lands at the Western Environs of Kilkenny City

Strategic Reserve is identified as follows in the City and Environs Development Plan:

“Areas of Strategic Reserve are included on the Zoning Map. These areas will provide for the long term expansion of the city, following substantial progress being made in the implementation of the Western Environs and Loughmacask areas. Local Area Plans, or appropriate planning framework documents will be prepared for the areas of Strategic Reserve as required in the longer term. The total area of the strategic reserve lands is 262ha.”

The above extract acknowledges the long term development potential of strategic reserve lands, with some limitations associated with the Grassland Fertiliser/Seveso II site at Tullaroan Road. There is no specific land use identified for Strategic Reserve lands other than to provide for the expansion of the city.

A land use strategy is required for the strategic reserve lands given the surrounding built context and the close proximity to the City centre. Strategic reserve lands represent the next logical step for the expansion of Kilkenny City and should be adequately addressed in the lifetime of the Draft County Development Plan 2020-2026, to avoid any potential shortfalls in available land in future years.



Density

Section 11.4.1 of the Kilkenny City and Environs Development Plan states the following in relation to densities:

“As in the preceding Development Plan it is not intended to prescribe maximum residential density standards. The emphasis will be on providing quality-housing environments based on innovation and a design led approach. A high standard of architectural design and layout will be required. The Planning Authority will seek to ensure that new developments have individuality and a sense of place, which is generated by the interaction between the physical characteristics and features of the site and its surroundings and the layout, landscaping and design of the new housing.”

This is relevant to the future expansion of Kilkenny City, which is unlikely to have any significant areas of available land that would be suitable for higher densities given relative distances from Kilkenny City Centre. Any densities for new development should consider the suitability of lower densities given the latent demand for larger development sites and in the region of 20-35 units per hectare at accessible locations.

3.2 Industrial Land Uses

The interface of industrial land uses with residential land uses in Kilkenny City should be considered as part of the Development Plan review process.

Any residential land use should be buffered from the industrial uses. This could include the provision of a strip of open space between residential land uses and adjoining industrial uses. The current Kilkenny City Development Plan states the following:

*“Open space performs a wide range of roles in enhancing the liveability of cities, towns, rural villages and the wider countryside, including functions relating to amenity, biodiversity, education, social and community benefits, and health benefits. Playing fields, parks, gardens and informal open spaces are not only important as a recreational resource but also provide valuable green areas for wildlife corridors and habitats, **act as buffers between different land uses, enhance visual amenity especially in developed areas and contribute to the health and quality of life of citizens.**” [BMC Emphasis]*

The above details highlight that some level of future provision for separation of these conflicting land uses should be provided.

Public Open Space

Section 11.7.3 of the Kilkenny City and Environs Development Plan states the following with regard to open space in new residential developments:

“Applicants will be required to make provision for sports and recreation infrastructure commensurate with the needs generated by any development and the capacity of existing facilities in the area to cater for existing and future needs.

The Council will require a minimum public open space provision of 2.4 hectares per 1,000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an occupancy rate of 2.8 persons per unit.

A reduction to this standard will only be permitted in exceptional circumstances as determined by the local authority. Where such a relaxation occurs the provision of open space within any scheme should not be below 10% of the site area.

Residential planning applications in excess of 200 units will require a recreational needs assessment.”

A number of different levels of leisure facilities may be suitable to provide necessary buffers and usable open space depending on the location and layout of residential uses. Proposed areas of open space may include sports pitches, play areas and multi use games areas.



3.3 Health Care Facilities

Section 5.10 of the Kilkenny City and Environs Development Plan refers to Health and states the following with regard to the demand for new facilities:

“Healthcare and medical facilities are provided by public, private and voluntary agencies within Kilkenny City and County. The Health Service Executive is the primary organisation responsible for the delivery of health care and personal social services to the people of Kilkenny. With the scale of increase in population, it is to be expected that there will be a demand for more healthcare and medical facilities within the city and county to cater for the resident population.”

Given the existing context of the Aut Even Hospital and the St. Luke’s General Hospital there is the potential for some complimentary land use in the surrounding area. This might include the following as outlined in the Development Plan:

“Healthcare facilities may include health centres, day centres, community nursing units, family resource centres, nursing homes/convalescent homes, community residences, sheltered workshops, activation centres and residential facilities for children and adolescents. These facilities require locations which are integrated with new and existing communities and which are easily accessible.”

Depending on demand and specific requirements for land in this regard, a proposed zoning of “Residential”, “Mixed Use” or “Community Facilities” would facilitate some variety of a nursing home, aged care facility or similar that would provide for the ageing population and the associated ongoing needs of Kilkenny City.



4 Grounds of Submission

The following summarises the main points of our submission having regard to the points raised by our review of the relevant planning policy context and existing development trends in Kilkenny City.

This Pre-Draft Issues Paper, Development Plan submission is summarised under the following headings for the purposes of this report:

- Principle of Rezoning
- Types of Development
- Residential Densities
- Key Considerations

4.1 Principle of Rezoning Lands

The lands that are most suitable for future development in Kilkenny City are not currently zoned for any particular land use, with these sites having a designation of “Strategic Reserve”. This considered, we are of the view that there exists potential for future rezoning at Strategic Reserve sites for primarily residential development with the possibility for some complimentary uses such as aged care or related land uses.

A Local Area Planning process should be advanced for the “strategic reserve” lands so that their strategic potential is realised and a coherent development strategy is put forward at the appropriate stage. A sufficiently flexible policy context should also be provided to allow unique development opportunities such as major employment or strategic land use applications to be considered on “Strategic Reserve” Lands in advance of a local area planning process.

4.2 Type of Development

Following a review of the broad planning history in the Western Environs of Kilkenny City and having considered the provisions of the Kilkenny City and Environs Development Plan 2014-2020, we are of the view that there is a requirement for further residentially zoned land within the City. The population of the City is expected to grow to more than 29,000 inhabitants during the lifetime of the plan from 2020-2026. It is critical, given current housing shortages, that an adequate supply is planned for in future years. While we acknowledge there is c.131 hectares of “Phase 2 Residential” land identified in the current City Development Plan, an additional supply is needed should the Phase 2 lands not be developed for reasons related to infrastructure constraints or the landowners not having any ambition to develop their landholdings for residential purposes.

Based on 2016 population statistics from the Central Statistics office there are 4,621 persons in Kilkenny City in the 60+ age cohort. This represents a 17.4% share of the overall population of Kilkenny City. Therefore, we submit that a complimentary aged care/housing for the elderly/nursing home use should also be provided for in the Draft Development Plan. We note there is “possible” provision for a nursing home in Western Environs Local Area Plan but no application for such a facility has been included in any of the applications on this land to date. We submit that a nursing home/retirement village/aged care facility or similar would be more suitably located further north, with easier accessibility to existing hospital facilities.

4.3 Residential Densities

We note that the majority of the environs surrounding Kilkenny City (within the boundaries of the outer ring road) are approximately 2km from the city centre and appropriate densities are encouraged at these locations under policy guidance documents. We would expect a density of somewhere between 20-35 dwellings per hectare to be promoted within Kilkenny City unless a site is specifically designated for low-density residential.



We note that ‘Professional Services’ represented almost 25% of occupations in Kilkenny City in 2011. These higher end jobs could be related to the “underlying demand for housing on large sites in the city which is at present satisfied by people building in the countryside close to the city”. We would recommend that the Planning Authority give close consideration to the provision of low-density residential in close proximity to high-end employment locations such as offices, hospitals etc. and in so doing, promote sustainable land use and transport planning practices whereby targeted low-density development is provided in close proximity to employment instead of in rural areas.

4.4 Key Considerations

There are a number of specific considerations that should be considered in the Draft Kilkenny County Development Plan 2020-2026, which relate to the future development of Kilkenny City and Environs. The key points to note are as follows:

- The Local authority should identify and zone an appropriate level of land in accordance with forecast population trends and allowing for lands already zoned that have infrastructure constraints or may not come forward for development during the lifetime of the new Development Plan.
- There is a requirement for substantial residential land use in Kilkenny City, with facilities for an aging population also necessary.
- Residential development should be planned and provided in close proximity to the main employment generators where possible with some low-density residential land required to meet latent demand for larger development sites.
- Pedestrian and cycling connections should be provided in local neighbourhoods as well as in connecting these neighbourhoods to the City Centre. Kilkenny is a compact city and sustainable modes of transport should be promoted accordingly.
- Areas of open space that provide for suitable buffers with adjoining land uses should be considered where appropriate.



5 Conclusion

- Having considered the existing statutory context for Kilkenny City Centre, we are of the view that there is a need for substantial residential land use zoning in the Draft Kilkenny County Development Plan 2020-2026.
- Given that 17.4% of the population of Kilkenny City is aged 60+ there is also a need for the provision of aged care facilities in the lifetime of the Draft Plan.
- Densities of 20-35 units per hectare should generally be promoted in Kilkenny City, other than on sites specifically designated for “low-density” residential.
- The “Strategic Reserve” Lands located to the west of Kilkenny City are the logical lands to provide for the future needs of the City and should be considered as such in the Draft Development Plan.
- If the development of strategic reserve lands is to maximise their potential in meeting established strategic planning objectives the review of the Kilkenny Development Plan should include planning objectives that prioritise the preparation of Local Area Plans for each of the “Strategic Reserve” land areas, to maximise the opportunities presented by these sites in accordance with the proper and sustainable development of these areas.
- We confirm that we represent Marie Brannigan in this case and request that all future correspondence in relation to the Development Plan Review process is forwarded to this office.

Trusting that this is in order.

Brock McClure Consultants

12th June 2018