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Planning Department
Kilkenny County Council
County Hall
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09 March 2021

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Director:

Harold Walsh

Company Reg. No:

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**Re: Submission to Stage 2 Review of:
Draft Kilkenny City and County Development Plan 2021 - 2027**

Dear Sir/ Madam

We act on behalf of LOU INVESTMENTS Healthcare Kilkenny Limited in partnership with Westcourt, who wish to make a submission in relation to the future proper planning and sustainable development of the permitted Newpark Primary Care Centre and Community Resource Centre (Planning Ref: 18/59), currently under construction. The submission has been prepared in response to Kilkenny County Council's invitation for submissions to the Stage 2 Public Consultation process for the publication of the Draft Kilkenny City and County Development Plan 2021 – 2027. For reference, the extent of the permitted development and the Primary Care Centre are indicated on Figure 1.1 below.

01. Purpose of the Submission

Our clients welcome the publication of the Draft Kilkenny City and County Development Plan and in particular, the acknowledgement within *Section 6: Placemaking* of the permitted Primary Care Centre (Kilkenny County Council Planning Ref: 18/59), currently under construction at Newpark.

The Planning Authority will be aware that at the time the scheme was permitted, the decision represented a material contravention of the Kilkenny County Plan 2014 – 2020, as the subject lands were zoned as Amenity / Green links/Biodiversity conservation/ Open Space/Recreation with the objective of allowing for green links and biodiversity conservation and to preserve, provide and improve recreational open space.

We note from reviewing the zoning map associated with draft Development Plan (See Figure 1.2) that the existing Amenity zoning designation has been maintained on these lands. We are requesting that the Planning Authority rezone the lands associated with the Primary Care Centre in order to better reflect the medical use and to allow for future flexibility in terms of planning applications.



Figure 1.1 Aerial map showing approximate outline of permitted development 18/59 in red and the footprint of the Primary Care Centre in blue

02. PLANNING POLICY

As outlined in section 6 of the Draft Plan as well as the current County Development Plan:

The primary role of the Planning Authority with regard to health care is to ensure that there is an adequate policy framework in place inclusive of the reservation of lands should additional services be required.

The current County Development Plan also states in relation to healthcare that one-stop primary care medical centres and GP practices will be encouraged at locations which are easily accessible to members of the wider community and that:

The Council will facilitate the development and expansion of health and medical care facilities in the city and county which meet the need of and are easily accessible to local service users throughout the city and county, subject to normal planning and environmental criteria and the development management standards.

03. Request

Our clients envisage that there may be some scope to introduce a pharmacy at ground floor level of the Primary Care Centre at some stage after it becomes operational. This would be an appropriate complementary use to the centre but would require a change of use planning application to be submitted.

We are requesting that the lands associated with the permitted Primary Care Centre, which is currently under construction, be re-zoned as a means of creating a coherent planning framework to allow the future expansion and adaptation of the development. We consider that the most logical means of updating the policy objectives on the subject lands would involve an expansion of the existing Neighbourhood centre zoning to the north of the Primary Care Centre site. The Neighbourhood Centre Zoning Objective seeks to:

provide for local shopping, non retail services, community and social needs.

Among the permitted uses within this land use zoning objective include:

*Supermarket (for local neighbourhood needs only), newsagents, car park, office above street level, place of worship, library, public building or place of assembly, cultural or recreational facility, leisure centre, **medical consultancy**, Playgroup or crèche, restaurant, public house, hotel/ motel, guest house, coffee shop, travel agents.*

Open for Consideration: open space, workshop or light industry above street level, off license, residential.

The Neighbourhood Centre zoning objective does not explicitly refer to pharmacies as a permitted use but we consider that this falls under the category of local shopping. We note an existing pharmacy located within the Newpark shopping Centre.

The expansion of the Neighbourhood zoning would allow for planning permission to be sought for suitable alterations or expansions of the permitted uses on the site without the need to materially contravene the upcoming Development Plan. The potential introduction of a pharmacy use to the development would effectively make it a one stop medical centre in a highly accessible location, a principle that is supported in the Current County Development Plan.

Our clients are seeking this re-zoning to be applied to the Primary Care Centre and its attendant grounds and car parking areas only. Surrounding land uses including the sports practice pitch which formed part of the permitted development, as well as amenity walkways and open spaces would be maintained under the existing Amenity zoning regime. Figures 1.2 and 1.3 below outline the zoning objectives as indicated in the Draft Plan and the expansion of the Newpark Neighbourhood Centre zoning to incorporate the Primary Care Center site, as requested in this submission.



Figure 1.2 Draft LAP Zoning Map with outline of Primary Care Centre in red.

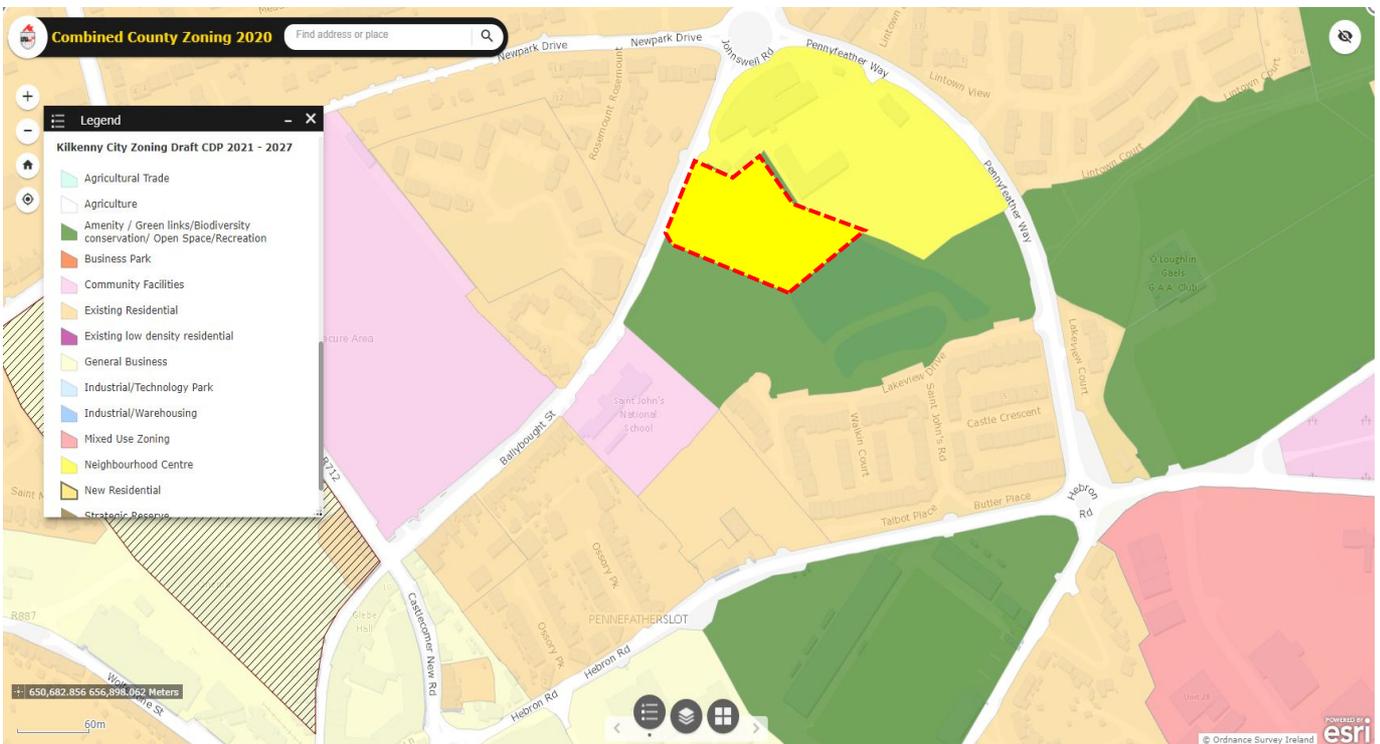


Figure 1.3 Draft LAP Zoning Map with suggested area for expansion of Neighbourhood Centre.

04. Permitted Primary Care Centre Development (Ref: 18/59)

Planning Ref:	18/59
Applicant:	Westcourt Healthcare Ltd
Description:	Planning permission for the development of a Primary Healthcare Centre and Community Resource Centre comprising a three storey structure and recreational facilities and landscape improvements. The Primary Healthcare Centre facility will provide for USE health and social care services and General Practice and associated meeting rooms, administrative offices, staff accommodation, receptions and ancillary uses. External works to the structure include roof plant and signage. The Community Resource centre will be an own door facility located in the ground floor of the proposed structure. The proposals also include a new vehicular entrance off Golf Links Road, car and bicycle parking, a set down area, footpaths, cycle paths, an ESB sub-station and waste store, pumping station, lighting and a totem sign. The recreational facilities comprise the provision of a school sports practice field and associated works and landscape works and improvements to the existing open space and ponds to form a public park at Lakeside and Golf Links Road, Kilkenny.
Decision:	Conditional
Grant Date:	24/08/2018

05. Summary

As outlined in both the existing and upcoming Development Plans, the primary role of the Planning Authority with regard to health care is to ensure that there is an adequate policy framework in place inclusive of the reservation of lands should additional services be required.

In addition, one-stop primary care medical centres and GP practices will be encouraged at locations which are easily accessible to members of the wider community. We are requesting that the existing Amenity zoning objectives on the Primary Care Center lands be updated to allow for the introduction of complimentary uses to the scheme and the proper planning of the centre during the lifetime of the upcoming County Development Plan.



Please do not hesitate to contact us if you have any queries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Harry Walsh', with a stylized flourish at the end.

Harry Walsh
HW Planning