

SUBMISSION TO DRAFT KILKENNY CITY AND COUNTY DEVELOPMENT PLAN 2021-2027

FOR LANDS AT MARBLE CITY BUSINESS PARK, CO. KILKENNY

March 2021

On behalf of:

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TABLE OF CONTENTS

1.0	INTRODUCTION	3
1.1	Rezoning Request.....	4
2.0	EXECUTIVE SUMMARY	5
3.0	SITE CONTEXT AND POLICY OVERVIEW	6
3.1	Site Context.....	6
3.2	Surrounding Urban Context.....	7
4.0	NATIONAL AND REGIONAL POLICY GUIDANCE SUPPORTING ‘TECHNOLOGY’ REZONING	10
4.1	National Planning Framework (NPF) – Project Ireland 2040	10
4.2	Regional Spatial and Economic Strategy (RSES): Southern Region 2020.....	10
4.2.1	County Kilkenny	11
4.2.2	Kilkenny City.....	11
5.0	KILKENNY COUNTY AND CITY DEVELOPMENT PLANS (AS VARIED)	12
5.1	Draft Kilkenny City and County Development Plan (KCCDP) 2021-2027	12
5.1.1	Economic Strategy	12
5.2	Kilkenny County Development Plan 2014 – 2020.....	12
5.2.1	Core Strategy and Economic Development	12
5.3	Kilkenny City and Environs Development Plan 2014 - 2020	13
5.3.1	Employment Land and Economic Strategy	13
5.4	Socio-Economic Profile	14
5.4.1	Kilkenny’s Economy	14
6.0	RATIONALE FOR PROPOSED REZONING	15
6.1	Appropriate Proposed Land Use Configuration and Zoning of Subject Lands.....	15
6.2	Policy Support - Compliance with Core Strategy	18
6.3	Local Economic and Community Plan (LECP)	19
6.4	Distribution and Development Status of Employment Lands	19
6.5	10 Minute City Concept	24
6.5.1	Local Transport Plan (LTP).....	25
6.5.2	Bus and Rail Network.....	26
6.5.3	Road Network	27
6.5.4	Pedestrian and Cycle Network.....	28
7.0	CONCLUSION	30
APPENDIX I	31	
APPENDIX II	32	
APPENDIX III	36	



Senior Executive Officer

Draft City and Development Plan
Planning Department
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John Street
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11th March 2021

[Submitted by Email]

RE: SUBMISSION TO THE DRAFT KILKENNY CITY & COUNTY DEVELOPMENT PLAN 2021-2027 FOR REZONING OF LANDS AT MARBLE CITY BUSINESS PARK, CO. KILKENNY FOR 'INDUSTRIAL/TECHNOLOGY PARK' AND 'INDUSTRIAL/WAREHOUSING' (50/50 SPLIT)

Dear Sir/Madam,

1.0 INTRODUCTION

Jangate Limited¹ has retained Tom Phillips + Associates², Town Planning Consultants (TPA), to make this submission to the *Draft Kilkenny City & County Council Development Plan 2021-2027*.

Marble City Business Park is a newly developed business park located to the south-east of Kilkenny City. The business park has the benefit of a full planning permission on 11.73 ha for 21 no. development plots and has infrastructure to include roads, services, dedicated water supply, telecoms and utilities. The subject lands are highly accessible and have permitted dual road access (currently single access in place) to the N10 Ring Road off the Loughboy Park Road to the east and from the Ring Road to the west. The entire landholding which measures c. 22.76 ha (56.24 acres) is zoned '*Industrial/Warehousing*' in the *Draft Plan 2021 - 2027*.

On behalf of our client, this submission proposes that the '*Industrial/Warehousing*' zoning on the entirety of the lands is reconsidered as part of the *City Draft Plan Review*. It is respectfully requested that the zoning on the site is amended to provide for a 50/50 split in zoning on the lands between '**Industrial/Warehousing**' and '**Industrial/Technology Park**'. See Figure 1.1 on the following page which illustrates the proposed reconfiguration of the zoning on the lands.

This submission recognizes that all decisions with regards to rezoning of lands must be based on the key objectives of the *National Planning Framework (the NPF)* and the *Regional Spatial and Economic Strategy for the Southern Assembly*, as well as local Development Plan Policy. This rezoning submission has reviewed all relevant planning policy and confirms that the proposed rezoning of the lands for a mix of Warehousing and Technology complies with current National and Regional and Local policy for economic growth.

Furthermore, an analysis was carried out of all employment zoned lands in Kilkenny, which supports the argument for additional '*Technology*' zoned lands.

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1.1 Rezoning Request

On behalf of our clients, we request that the zoning of the subject lands be amended in the Draft *Kilkenny City and County Development Plan 2021-2027* as follows (and as illustrated on Figure 1.1):

FROM

'Industrial/ Warehousing: To provide for industrial employment and related uses.'

TO

'Industrial/ Warehousing: To provide for industrial employment and related uses.'

AND

'Industrial/ Technology Park: To provide for industry and information technology-related industrial and office development and ancillary services.'

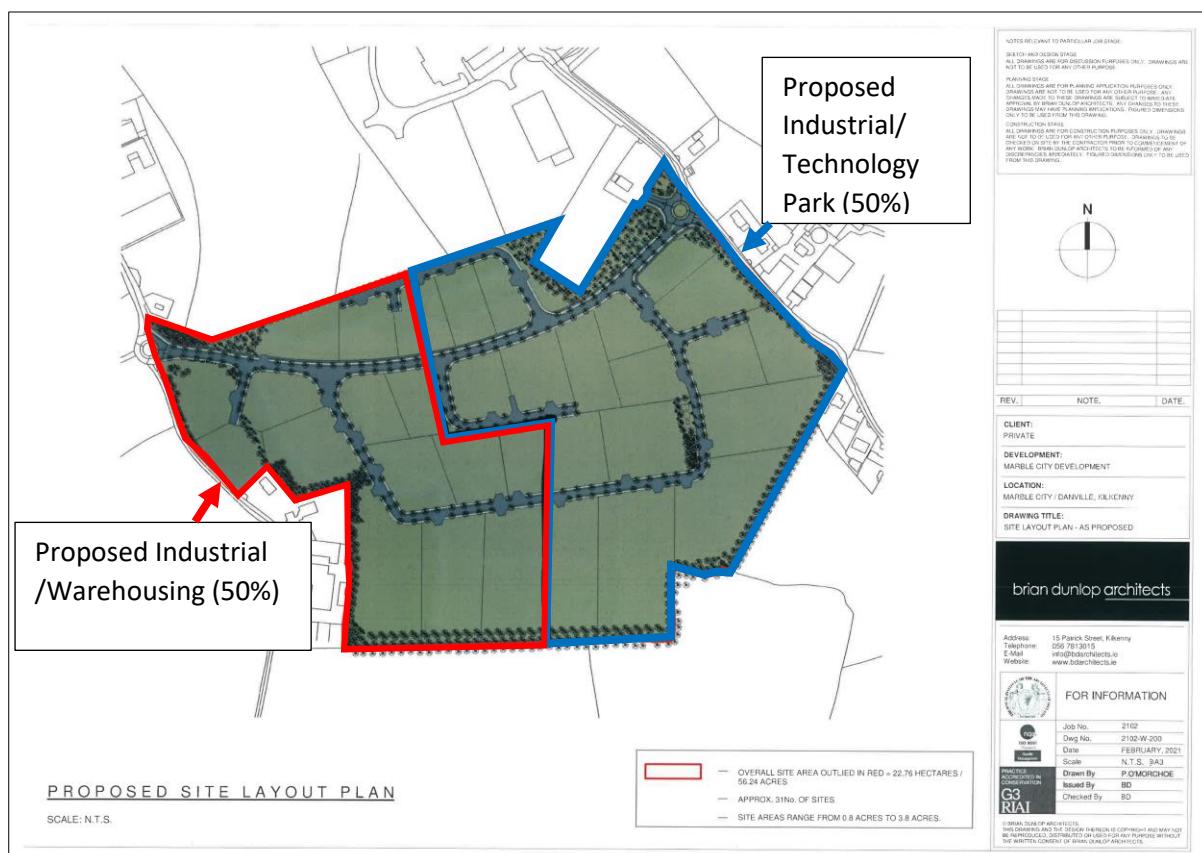


Figure 1.1: Proposed Rezoning '*Industrial/Warehousing*' and '*Industrial/Technology Park*' (50/50 split) (Source: BDA Architects – Proposed Site Layout, Annotated by TPA, March 2021)



2.0 EXECUTIVE SUMMARY

A review of the National Planning Framework and the Southern Region Economic Strategy, indicate that Kilkenny City has been identified as a ‘key town’ with ‘*significant influence in the region*’. Kilkenny City has been identified as the ‘fourth largest settlement’ in the region. The City is centrally located within the Southern Region with good road and rail links to Dublin and elsewhere. The Core Strategy map from the *Draft KCCDP 2021-2027* identifies key ‘employment areas’ within the city. Marble City Business Park is located within one of these key employment land banks.

Kilkenny has a strong industrial and enterprise tradition and it is a National and Regional objective ‘*to strengthen the role of Kilkenny City as a self sustaining regional economic driver*’ while supporting its ‘*instrumental assets*’ for development, such as the region’s universities and research centres. It is a Regional Planning Objective (RPO12) to ‘*strengthen the role of Kilkenny City as a selfsustaining regional economic driver*’ and ‘*build upon its inherent strengths including the finance, technology and creative sectors, skills, innovation and enterprise, tourism, and retail services.*’

It is proposed to rezone the lands for both **Industrial/Warehousing** and **Industrial/Technology Park** (**as indicated on Figure 1.1 in this report in a 50/50 Split**).

The mix of ‘permitted uses’ and ‘uses open to consideration’ with a change in zoning, would improve the site’s ability to attract inward investment and would be able to support a wider variety of potential tenants. A rezoning to ‘Industrial/Technology Park’ would also support the trend for Technology/Office/Education type development in Kilkenny, which is clearly evident in the adjoining area and in the wider city.

TPA have analysed the main employment/industrial type zoning objectives in the Kilkenny Development Plan. We conclude that the ‘*Industrial/Technology Park*’ serves a broader objective ‘*to provide for industry and information technology-related industrial and office development and ancillary services.*’ The introduction of an ‘*Industrial/Technology Park*’ zoning on the subject lands would be in accordance with RPO12, as it would enable further Technology Park type uses to be introduced onto the lands, thus strengthening Kilkenny in terms of employment generation.

A majority of the employment sites zoned for ‘*Industrial/Technology Park*’ and ‘*Industrial/Warehousing*’, have been developed within ‘*Cluster II*’ identified in Section 6.4 of this submission. However, the subject site lies within ‘*Cluster I*’, which consists of a considerable amount of undeveloped land zoned for ‘*Industrial/Warehousing*’ and ‘*Industrial/Technology Park*’. The rezoning of the subject site for a 50/50 split between Warehousing and Technology Park in this cluster would enable, enhance and support the expansion of employment generating development on the lands.

3.0 SITE CONTEXT AND POLICY OVERVIEW

3.1 Site Context

The subject lands are located in Joinersfolly, a suburb on the south-eastern edge of Kilkenny City. The site is situated along the southernmost part of the settlement boundary of Kilkenny City. Adjoining landuses adjacent to the site mainly consist of employment lands, primarily zoned for '*Industrial/Warehousing*', '*Industrial/Technology*' and '*Business Park*'. To the south of the site are greenfield lands located beyond Kilkenny settlement boundary. (See Figure 3.5)

The site is accessed off Kilkenny City's Ring Road (N.10) with excellent connectivity to the M.9 (Dublin-Waterford) motorway. The site has permitted access to 2 roads, the Loughboy Park and the Ring Road which branch onto the N10. Additionally, the KK1 and KK2 bus services offered by TFI terminate at a station located under 500 meters north of the site.

The entirety of the subject site is currently zoned '*Industrial/Warehousing*' with the following zoning objective;

'To provide for industrial employment and related uses.'



Figure 3.1: Location of Marble City Business Park in relation to Kilkenny City.
(Source: Google Maps. Annotated by TPA, March 2021)



Figure 3.2: Subject site within its urban context. (Source: Bing maps. Cropped and annotated by TPA, 2021.)

3.2 Surrounding Urban Context

Marble City Business Park is located at the heart of commercial activity with neighbours including Glanbia Plc Corporate Headquarters, Statestreet bank, Taxback.com, Transfermate and Bank of Ireland's "Banking 365" call centre. The site is situated adjacent to the Kilkenny Retail Park which includes Woodies DIY, Hickey Fabrics, DID Electric, Halfords, PetMania, EZ Living and Meubles.

Table 3.1: Adjoining Land Uses

North	Industrial/Technology Park
South	Greenfield Land (Outside Settlement Boundary)
East	Greenfield Land (Outside Settlement Boundary)
West	Business Park and Greenfield Land (Outside Settlement Boundary)

Source: Draft KCCDP 2021-2027 Zoning Map



Figure 3.3: Aerial view of the R2 road as captured by google maps 2021. (cropped and annotated by TPA, March 2021.)



Figure 3.4: Images of Entrance to Marble City Site (left), existing Estate Road (right). (Source: Brian Dunlop Architects, 2021.)

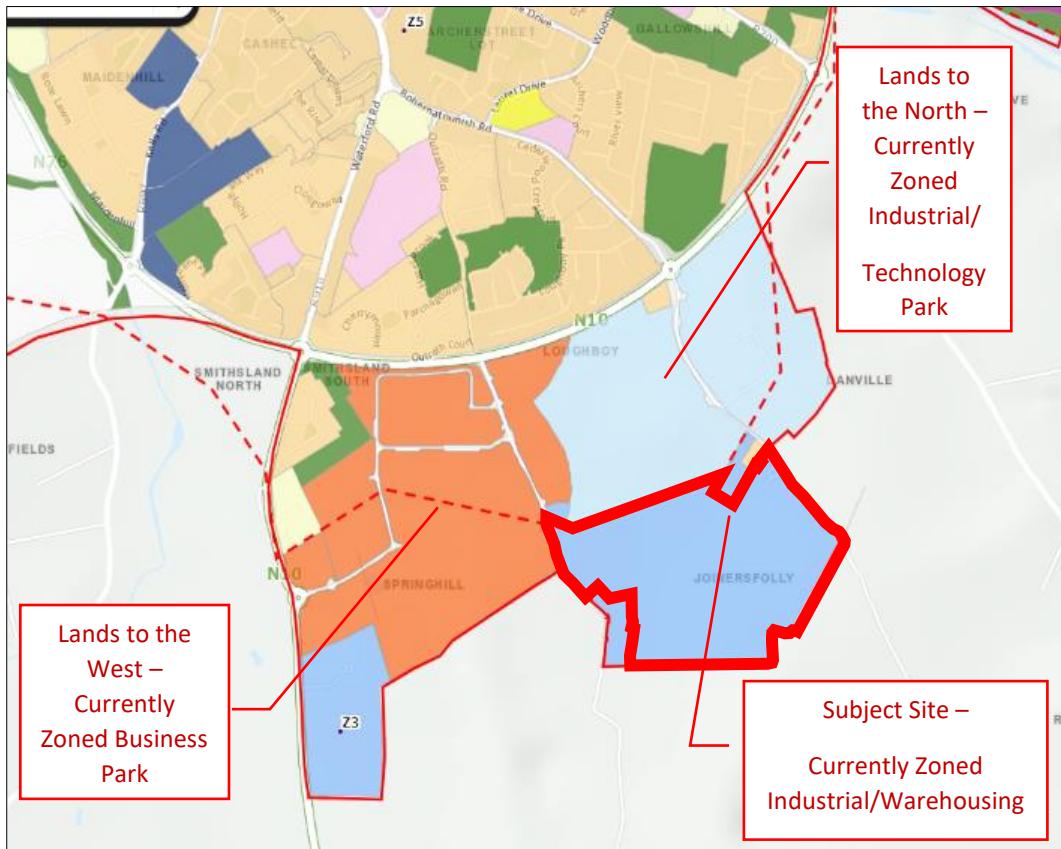


Figure 3.5: Current land use zoning objective for the subject site (Lands outlined in Red), as per the Draft KCC Dev Plan 2021-2027

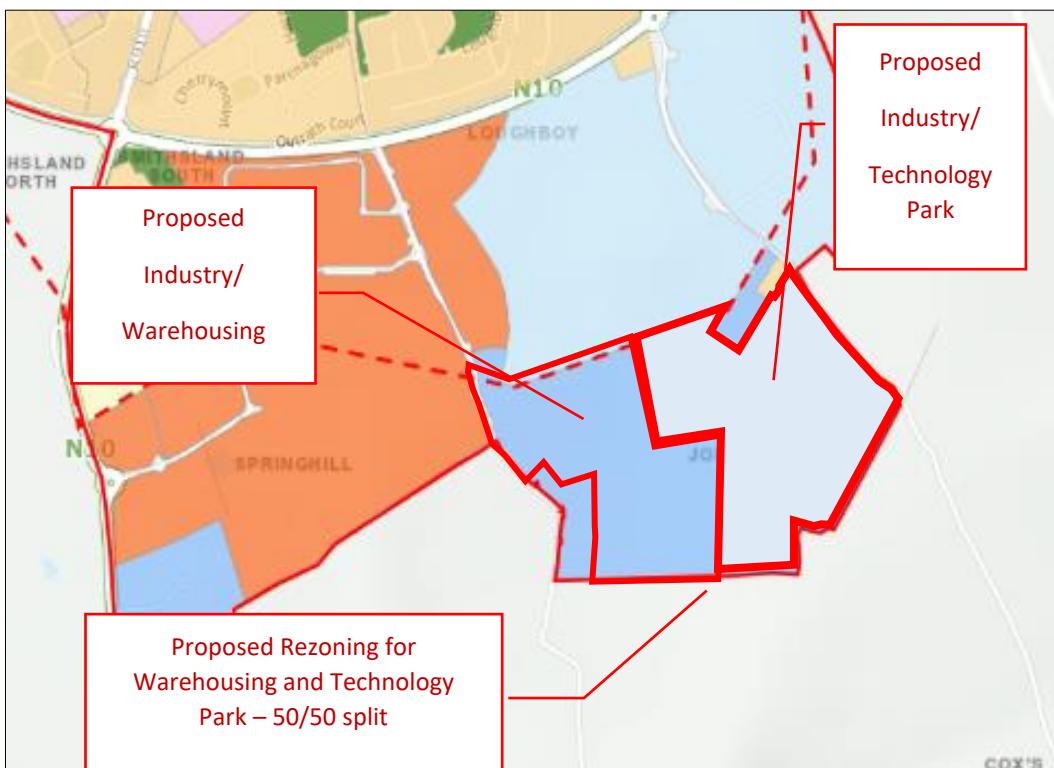


Figure 3.6: Proposed land use zoning objective for the subject site (Lands outlined in Red), as per the Draft KCC Dev Plan 2021-2027



4.0 NATIONAL AND REGIONAL POLICY GUIDANCE SUPPORTING ‘TECHNOLOGY’ REZONING

The proposed rezoning of 50% of the site from ‘Industrial’ to ‘Technology’ will enable a far greater range and mix of allowable uses and will support future economic growth in Kilkenny. (See Proposed Rezoning Map – Figure 3.6) There is evidence of strong growth within business and financial services, and a decline in ‘traditional manufacturing’ in the Southern Region as stated within the RSES for Southern Regions. This change from all an all Industrial zoning to a more Technology based zoning would reflect this trend and is supported by National and Regional Policy and by predicted economic growth patterns in the region. Supporting policy in this regard is outlined below.

4.1 National Planning Framework (NPF) – Project Ireland 2040

National Policy Objective 11 states that:

“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”

Further, the NPF states that:

A Strong Economy Supported by Enterprise, Innovation and Skills requires a competitive, innovative and resilient regional enterprise base. We need to foster an enterprise environment **which entices people to live and prosper in the Region. To withstand the external shocks** that an open economy can be subjected to, resilience and agility must be the watchwords for a sustainable, healthy and thriving regional economy.

(Our Emphasis)

4.2 Regional Spatial and Economic Strategy (RSES): Southern Region 2020

The RSES recognises that cities are the pillars on which to base the RSES settlement and economic strategy. Further, a key component of the RSES is about building partnerships and a collaborative approach between the cities and metropolitan areas to realise combined strengths and potential, and to support their development as a viable alternative to Dublin.

One of the key enablers identified by the RSES to achieve their strategy of building one of ‘Europe’s most Creative and Innovative, Greenest and Liveable’ is by:

“Delivering ambitious and sustainable growth targets for our cities, developing and consolidating our Key Towns, creating the Greenest and most Liveable Metropolitan Areas for diverse communities, culture and enterprise - developing the Cork Docklands, regeneration of LimerickShannon, including the Limerick Northern Distributor Route/ Smart Travel Corridor, and achieving a balanced ‘concentric city’ model north of the river in Waterford with development of the North Quays and adjoining lands in Kilkenny.”

(Our Emphasis)



4.2.1 County Kilkenny

The RSES states that the headquarters of a wide range of multinational companies are located in the Region, particularly around the main cities. Enterprises supported by Enterprise Ireland and the IDA employ over 138,000 people, contributing nearly 20% to total employment in the Region.

There is evidence of strong growth within business and financial services, and a decline in ‘traditional manufacturing’. The Region’s Universities, Institutes of Technologies, Colleges and research centres are an instrumental asset in supporting our innovation potential. In overall terms the Region has a strong basis for future economic development.

4.2.2 Kilkenny City

Kilkenny City is identified as the fourth largest settlement in the Southern Region. It is centrally located within the region with good road and rail links to Dublin and elsewhere. The City is internationally renowned as an historic medieval city with major tourist attractions, a popular conference location and an important centre for arts and culture, including high profile annual festivals. Kilkenny is also known to have a strong industrial and enterprise tradition.



5.0 KILKENNY COUNTY AND CITY DEVELOPMENT PLANS (AS VARIED)

5.1 Draft Kilkenny City and County Development Plan (KCCDP) 2021-2027

According to the Draft KCCDP 2021-2027, Kilkenny City along with Belview Port, have been identified to have a nationally and regionally important strategic location for enterprise and employment.

5.1.1 *Economic Strategy*

The Economic Strategy for the City is embedded within that for the County being grounded in,

“ financial services, technology, tourism and hospitality, manufacturing, creative industries, agriculture and food, and third level education.”

Kilkenny City being identified as one of the main economic generators of the county, has many strengths as an attractive location for industry, identified within the Draft KCCDP 2021-2027, such as:

- *Status as the administrative centre of the County;*
- *A reasonably sized city with population of 26,500 (in 2016);*
- *The 8th largest employment centre in the State;*
- *The potential to grow by over 30% up to 2040 under the National Planning Framework;*
- *Designated as a Strategic Key Town under the Regional Spatial and Economic Strategy;*
- *Rail and Motorway connections to Dublin, Waterford and Belview Port situated on the Dublin – Carlow-Kilkenny Waterford M9 Road/Rail Axis, with links to the Eastern Corridor;*
- *Containing excellent infrastructure in terms of roads, rail, airports and seaports – only 120 km from Dublin airport and 45 km from the port facilities at Belview in South Kilkenny and the South East Regional Airport at Waterford;*
- *Excellent social and leisure amenities with good quality urban and natural environment;*
- *Proximity to existing third-level colleges in the south-east and developing third level connections with Waterford and Carlow Institutes of Technology;*
- *A committed location for third level education through the new to be established Technical University for the South East (TUSE) or other third level activity.*

(our Emphasis)

5.2 Kilkenny County Development Plan 2014 – 2020

5.2.1 *Core Strategy and Economic Development*

Kilkenny City has been identified as a Hub in the NSS, and is a key driver which can help promote more balanced regional development. Under the NSS and South East Regional Planning Guidelines Kilkenny City has a target population of 28,200 to be reached by the year 2022. Kilkenny is the driver of growth for the County at a sub-regional level and also supports Waterford City in its role as a Gateway. In order to fulfill its role as a Hub, Kilkenny City will be the main focus for public and private sector investment within the county over the period of the Plan.

Strategic Aim: To implement the provisions of the Regional Planning Guidelines and to target the growth of Kilkenny City, Ferrybank/Belview, the District Towns, the other settlements in the hierarchy and rural areas to advance sustainable development.

The Programme for Government provides for a Technological University of the South East. There is a further potential role for local authorities to use research and innovation as a means to support



employment creation and to promote a greater integration of local institutions in the delivery of supports for the local enterprise sector. Local authorities can develop a more proactive approach to embrace and integrate aspects of the work undertaken by universities, institutes of technology and research institutions in provision of its business supports and develop a stronger working relationship with academic institutions. Kilkenny Local Authorities will actively support the development of a Technological University for the South East Region.

Objective: 4A To increase co-operation between Kilkenny Local Authorities, existing third level institutions and the proposed Technological University for the South East to support employment creation, innovation and lifelong learning.

Objective: 4C To ensure an adequate amount of employment land on a campus type environment is available within the County for ICT and technology office based industry at the appropriate strategic locations.

Rural areas have a vital contribution to make to the achievement of balanced regional development. This involves utilising and developing the economic resources of rural areas, particularly in agriculture and food, marine, tourism, forestry, renewable energy, enterprise and local services, while at the same time capitalising on and drawing strength from vibrant neighbouring urban areas. In this way rural and urban areas are seen as working in partnership, rather than competing with each other. Rural development has been dealt with in detail in Chapter 6 of this plan. Certain kinds of industry, especially those which involve natural resources and serve rural communities may, at an appropriate scale, have a role to play in rural development.

Objective: 4F To ensure that an adequate quantity and range of land is available for enterprise development and that the appropriate infrastructure is provided.

5.3 Kilkenny City and Environs Development Plan 2014 - 2020

Kilkenny City is the capital of the county and the principal service centre for the wider hinterland. The development of Kilkenny over the last three development plans has been primarily concentrated to the south and east of the City, influenced by the availability of services and good road connections. The City accommodates vital services for the County such as the headquarters of Kilkenny County Council, the Health Services Executive offices, the Garda, Court Services and St Luke's General Hospital. It also serves a wide hinterland in terms of community facilities, fire services, law enforcement and education.

Strategic Aim: To implement the provisions of the Regional Planning Guidelines and to target the growth of Kilkenny City in a compact urban form to advance sustainable development.

5.3.1 Employment Land and Economic Strategy

As part of the development strategy, the major employment areas are located south of the N10 Ring Road at Smithsland, Joinersfolly, Loughboy and Danville, the Hebron Road, Purcellsinch and a Business Park zoning at Leggestrath. These land banks are strategically located close to existing transportation corridors such as the N9/N10, the Ring Road extension and the N10 motorway link. South of the N9/N10 at Smithsland, Joinersfolly, Loughboy and Danville is a strategic parcelling of lands that can cater for Enterprise, Business and Technology parks for Foreign Direct Investment through the IDA and quality industrial lands catering for small and medium enterprises. This approach of leaving sufficient zoned land enables a clustering of businesses and firms including those involved in interrelated activities thereby providing for critical mass of economic activity at one specific location.



Strategic Aim: To provide a framework for the implementation of the economic strategy and the protection of the environment and heritage, to position the city for sustainable economic growth and employment.

(Draft KCCDP 2021-2027)

5.4 Socio-Economic Profile

5.4.1 Kilkenny's Economy

The city has a high profile nationally and internationally as a centre for tourism, festivals, heritage and the arts. County Kilkenny boasts a strong indigenous industry in sectors such as food and drink (e.g. Glanbia and artisan food producers) as well as the craft sector. Infrastructural improvements such as the completion of the telecoms Metropolitan Area Network (MAN) around Kilkenny City and the opening of the M9 motorway has increased opportunities for inward investment.

Figure 5.1 below demonstrates that the predominant industry by persons at work is that of 'Professional Services'. Second to that is 'Commerce and trade'.

A relatively low number of persons are seen to be occupied by the 'Manufacturing Industries'.

The proposed rezoning of the subject lands to 'Technology' would support this economic trend.

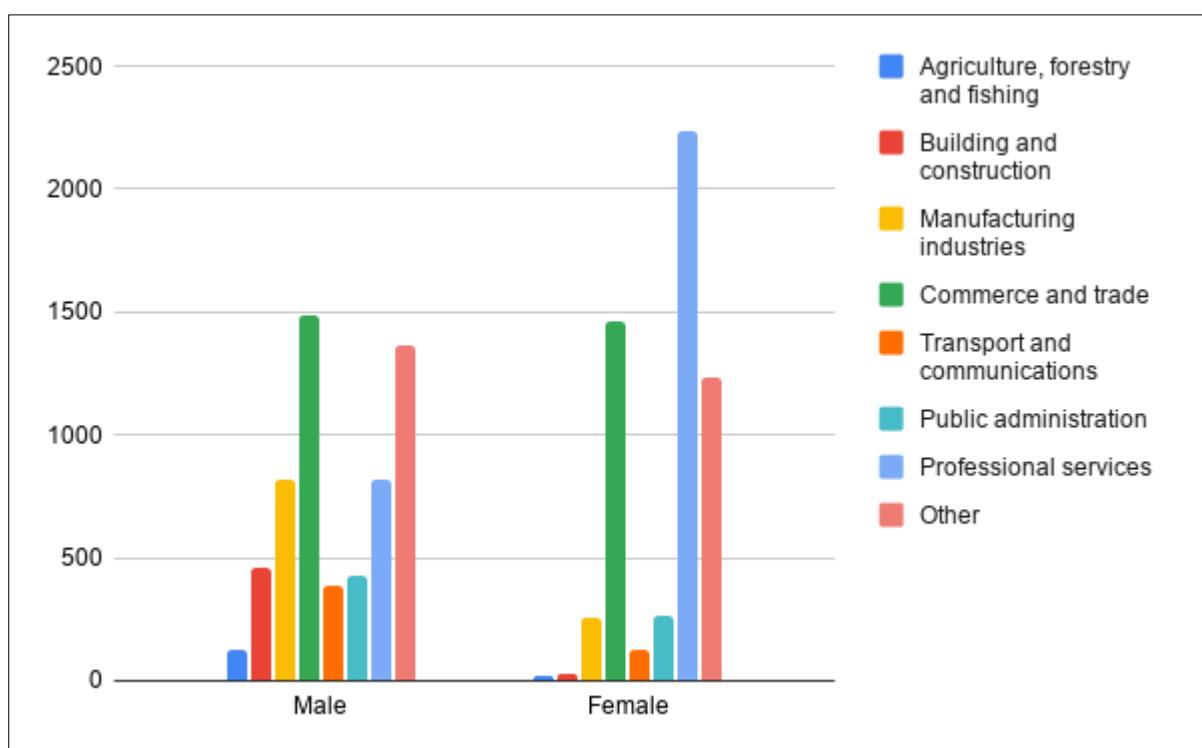


Figure 5.1: Persons at work by Industry in Kilkenny City end of 2016. (Source: CSO data 2016)



6.0 RATIONALE FOR PROPOSED REZONING

It is proposed to rezone the lands for both **Industrial/Warehousing** and **Industrial/Technology Park** (as indicated on Figure 1.1 in this report in a 50/50 Split).

The mix of ‘permitted uses’ and ‘uses open to consideration’ would increase considerably, and accordingly, the sites ability to attract a wider variety of potential tenant/inward investment would be supported. It would also support the trend for Technology/Office/Education type development in Kilkenny, which is clearly evident in the adjoining IDA Business Park and in the wider city.

‘Industrial/ Technology Park

Objective: To provide for industry and information technology-related industrial and office development and ancillary services. The purpose is to encourage mainly services type employment on a campus environment.

Permitted Uses: Industrial premises and office based industry, car parks, crèches, local convenience shop, Automated teller machines, open spaces, warehouses, third level education and research.

Open for consideration: recreational use/buildings, public service installations and conference facilities, restaurant, waste transfer stations.’

‘Industrial/Warehousing

Objective: To provide for industrial employment and related uses.

Permitted Uses: General industrial uses and ancillary offices, open spaces, warehouses, car and heavy vehicle parks, petrol filling stations, civic, amenity/recycling centre, local convenience shop, Automated teller machines, car showrooms, advertisement structures, wholesale premises, public service installations, play school/crèche, repair garages, telecommunications structure, waste transfer stations, single retail warehousing units (excluding retail warehousing parks).

Open for Consideration: Science and technology-based industry, restaurant, halting sites, recreational use/buildings.’

Figure 6.1: Image Illustrating ‘Uses Permitted and Open to Consideration’ (Source: Schedule of objectives and permitted uses of relevant land uses from the Draft KCCP 2021-2027, March 2021)

6.1 Appropriate Proposed Land Use Configuration and Zoning of Subject Lands

It is recognized within the RSES for Southern Region that:

“The headquarters of a wide range of multinational companies are located in the Region, particularly around the main cities. Enterprises supported by Enterprise Ireland and the IDA employ over 138,000 people, contributing nearly 20% to total employment in the Region. There is evidence of strong growth within business and financial services, and a decline in ‘traditional manufacturing’. The Region’s Universities, Institutes of Technologies, Colleges and research centres are an instrumental asset in supporting our innovation potential. In overall terms the Region has a strong basis for future economic development.”



(Our emphasis)

This statement from the RSES emphasises that the Southern Region has much potential for economic growth particularly in the field of Technology and supporting the region's key Technology Institutes due to their role as an '*instrumental asset*' is crucial to the economic development of the Southern Region.

It is currently a Regional Planning Objective to develop Kilkenny City as a '*self sustaining regional economic driver*' by building upon '*its inherent strengths*' specifically in the field of technology services along with others as listed in objective 'a' of the RPO12. The RPO12 aims:

To strengthen the role of Kilkenny City as a selfsustaining regional economic driver with significant zone of influence and Key Town on the Dublin – Carlow-Kilkenny Waterford M9 Road/Rail Axis, with links to the Eastern Corridor. The RSES seeks to leverage its strategic location and accessibility to the Port of Waterford & Rosslare Europort, Waterford Airport and to build upon its inherent strengths including the finance, technology and creative sectors, skills, innovation and enterprise, tourism, and retail services;

(Our emphasis)

With Kilkenny and Kilkenny City being identified as a '*significant zone of influence*' in the South-East, and where Kilkenny City is recognised as is the '*fourth largest settlement*' in the Region, with a '*strong industrial and enterprise tradition*', it would mean that Kilkenny City requires sufficient land zoned for Industrial uses (both Warehousing and Techology/Office based) to support its tradition.

The Economic Strategy for the City and County in the Draft KCCDP 2021-2027, indentifies the following industry sectors as being key to Kilkenny's future economic development, especially in terms of employment growth, as being, '*Financial services, Technology, Manufacturing, Agriculture & Food, Creative Businesses, Tourism & Hospitality, Third Level Education*'.

Four out of these seven industrial sectors fall within the zoning objective of 'Industrial/Technology Park' and 'Industrial/Warehousing', indicating the demand for lands zoned for the said uses.

As the zoning for '*Industrial/Technology Park*' has been identified to serve a broader objective, it could allow for the accommodation of a wider range of employment uses to be developed within the site in the field of information technology. The said zoning type specifically caters to the growth of '*third level education and research*' as it is listed under permitted uses. Therefore, we believe that the proposed rezoning for the subject site from 'Industrial/Warehousing' to 'Industrial/Technology Park', could further support the development of Technology Institutes in Kilkenny.

The Draft KCCDP Economic Strategy recognizes that,

"Kilkenny is home to global tech organisations and start-ups including global cyber security specialists, CipherTechs and SRA Security Risk Advisors and agri-tech AB Agri. Applied research centres in the region are leading the agenda in the Internet of Things and next generation ICT. Research group Telecommunications Software & Systems Group (TSSG) have a base at Burrells Hall, St Kieran's College, Kilkenny along with the innovation centre – PACE (Precision Agriculture Centre of Excellence)."



St. Kieran's College is located along College Road and is situated centrally within the City. Owing to its central location within the city, it could potentially restrict further expansion of the campus facilities as the surrounding lands to the college are significantly built up. Currently, there have been planning applications³ which were granted within the premises proposing temporary change of use to office space, indicating a clear need in the city for office type/educational development.

Allowing for the subject lands to be zoned for 'Industrial/Technology Park' could potentially allow for further expansion of larger campus facilities or the establishment of a Technology Institute. This could cater to the wider population of the region as the permitted uses for these zoning types (see table 6.1) would allow for development of office based industry along with third level education and research facilities.

It is also stated within the Draft KCCDP 2021-2027, economic Strategy that:

"There is a convincing educational, social and economic case for locating tertiary/higher education and training provision in Kilkenny⁴. The proposal for a third level campus in Kilkenny aligns well with regional policy, especially as regards providing counterweights to Dublin, based on making the South-East region more attractive than it currently is. Leveraging the advantages of smart specialisation, which is based on maximising regional expertise for national and global competitiveness, would be essential. The proposal also aligns with government policy across education."

And it is the objective of the Economic Strategy of the Draft KCCDP 2021-2027 as follows:

"To secure the development of a third and/or fourth level campus(es) in Kilkenny as part of the development of a Technological University for the South East."

(Objective 5I)

It is also a Key policy objective within the Economic Strategy stated in the Draft KCCDP 2021-2027;

"To ensure that there is sufficient quantity of zoned land available and serviced at suitable locations within the City and County to maximise the potential for employment and Foreign Direct Investment in the County."

(Objective 5B)

Thus, we consider that the rezoning of part of the subject lands to 'Industrial/Technology Park' could facilitate and promote growth in the Technology sector within Kilkenny City, while also accommodating for the development of key 'instrumental assets' of the city, such as the provision of a third level campus in Kilkenny City, thereby maximising regional expertise and global competitiveness of the region.

³In the case of St. Kieran's College, employment use was established under planning ref. 17/836. There has been no perceptible negative impact on the educational uses within the college. It is considered that employment use here can be considered as acceptable in principle provided there is a clear demonstration that the education uses on the campus are not impinged. A site specific objective is included on Figure CS5 City Zoning. (Draft KCCDP 2021-2027)

⁴From Charter to Framework: The Case for Higher Education Provision in Kilkenny April 2018.

6.2 Policy Support - Compliance with Core Strategy

The Draft Kilkenny City and County Development Plan, identifies a number of sites serving the purpose of 'Employment Areas' and are identified in the region south of the N10 Ring Road at Smithsland, Joinersfolly, Loughboy and Danvile, the Hebron Road, Prceullsinch and Leggestrath. (See Figure 6.2 below.)

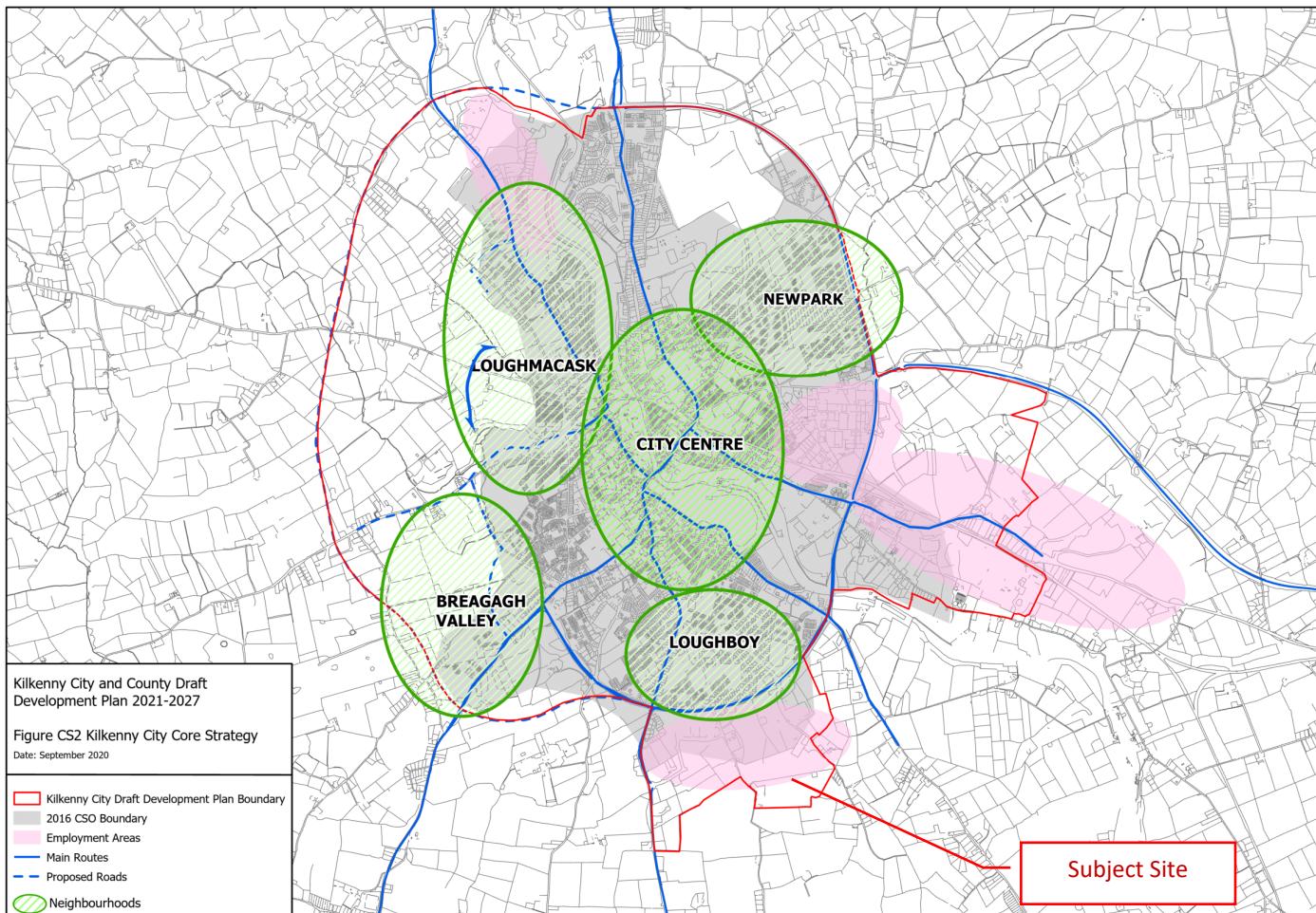


Figure 6.2: Map Indicating Employment Land Banks from the Draft KCCDP 2021-2027. (Source: Kilkenny County Council)

These lands have been strategically located by the Council, in close proximity to existing transportation corridors such as the N9/N10, the Ring Road extension and the N10 motorway link.

The employment land banks currently consist of lands zoned for a mix of uses such as, 'General Business', 'Business Park', 'Industrial/Technology Park,' and 'Industrial/Warehousing'.

The subject lands proposing a rezoning to the use of 'Industrial/Technology Park', are also found to be located within these identified employment lands and are currently zoned for 'Industrial/Warehousing' use. Hence, the rezoning proposal for the subject site conforms with the Core Strategy of the current Development Plan.



6.3 Local Economic and Community Plan (LECP)

The Local Economic and Community Plan (LECP) details the following economic actions which are relevant to the growth potential of the subject lands:

- ***strengthening the local enterprise base, and thereby encouraging job creation and multisectoral employment potential.***
- ***providing an integrated support structure for enhanced levels of enterprise start-up and growth, including through the LEO and Enterprise Ireland (EI).***
- ***supporting, co-ordinating and optimising the visitor experience across the county.***
- ***encouraging and supporting up-skilling, job mobility and enterprise creation in key economic growth sectors.***
- ***increasing the levels of rural economic activity and building sustainability into the rural economy.***
- ***encouraging integrated transport systems through the use of existing and new infrastructure innovations, and increasing the use of communications technologies through enhanced infrastructure and skilled communities.***
- ***encouraging and supporting biodiversity and the protection and enhancement of local heritage and culture, supporting energy efficiency and maximising the circular economy potential.***
- ***proactively working with IDA Ireland to increase inward investment.***
- ***contributing to the growth of the region and expanding the international reach of the local economy.***

(Our emphasis.)

These actions by the LECP, ensures that there is good potential for growth for the subject lands. It is also evident from these actions, that it is essential to support and encourage economic development in the key economic growth sectors of the region. With Kilkenny City being identified as a '*region of significant influence*' within the Southern Regions RSES, there is much potential and reliance for growth and development of the city.

6.4 Distribution and Development Status of Employment Lands

Currently, according to the *Draft KCCDP 2021-2027*, employment lands have been distributed mainly within two areas of the city forming two main clusters (I and II) of employment sites along the southern edge of the City along the N10 Ring Road, as well as along the Dublin Road R712 transport corridor. (See Figure 6.3)

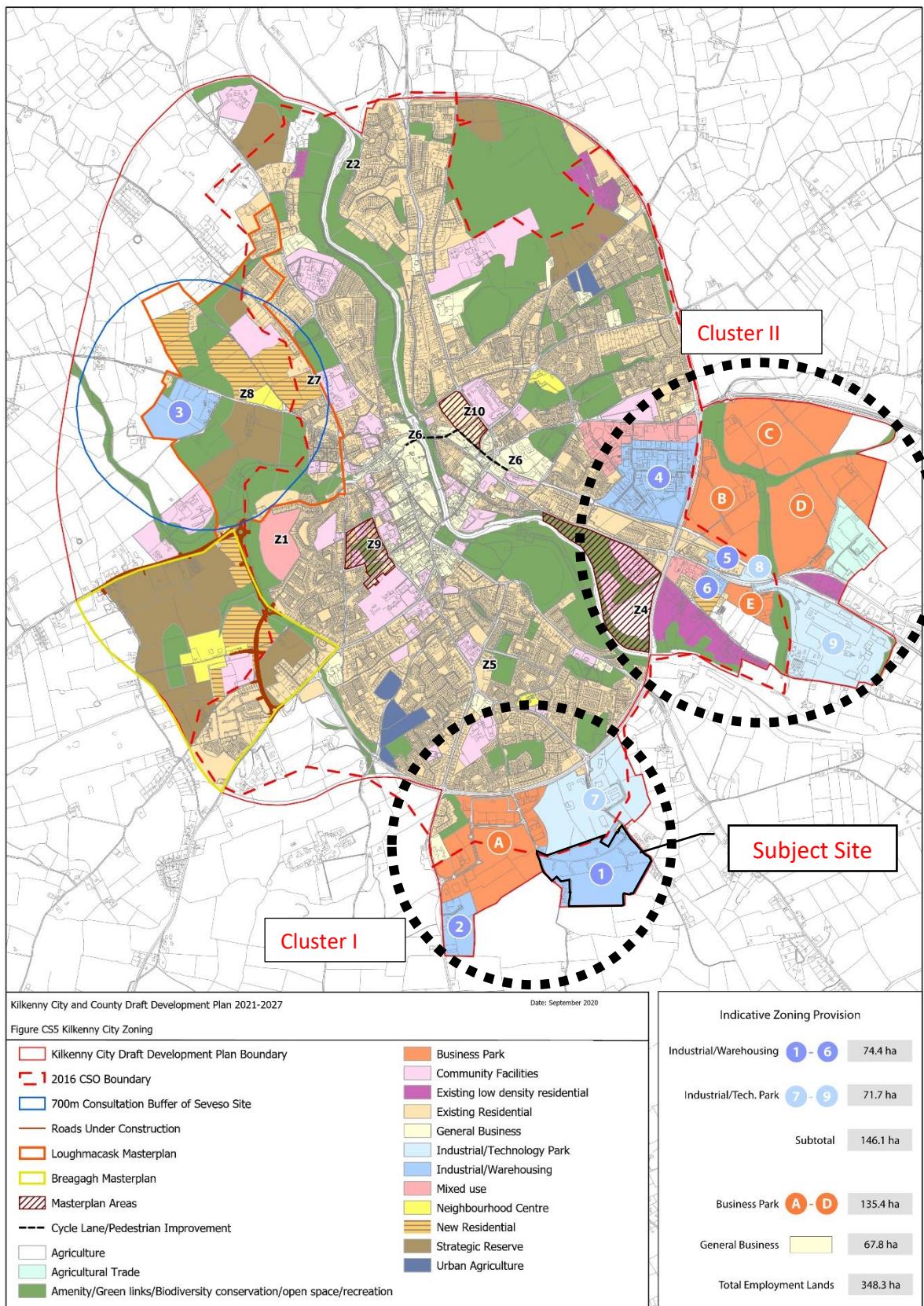


Figure 6.3: Map indicating the various employment sites across the city grouped in 2 clusters.
(Source: Draft KCCDP 2021-2027, TPA 2021.)



The subject lands (referred to as Site '1' in the following map and table below) are located within Cluster I which comprises of a mix of employment sites zoned, 'Business Park', 'Industrial/Warehousing', 'Industrial/Technology Park', and a relatively small parcel of land zoned for 'General Business'. (See Figure 6.4.)

It can be seen from Figure 6.5 that all of the lands zoned 'Industrial/Technology Park' and 'Industrial/Warehousing' are only partially developed. The 'IDA Business Park' lands however contain a considerable amount of fully developed lands, with only Site 'A' (See Figure 6.4 below) being undeveloped.

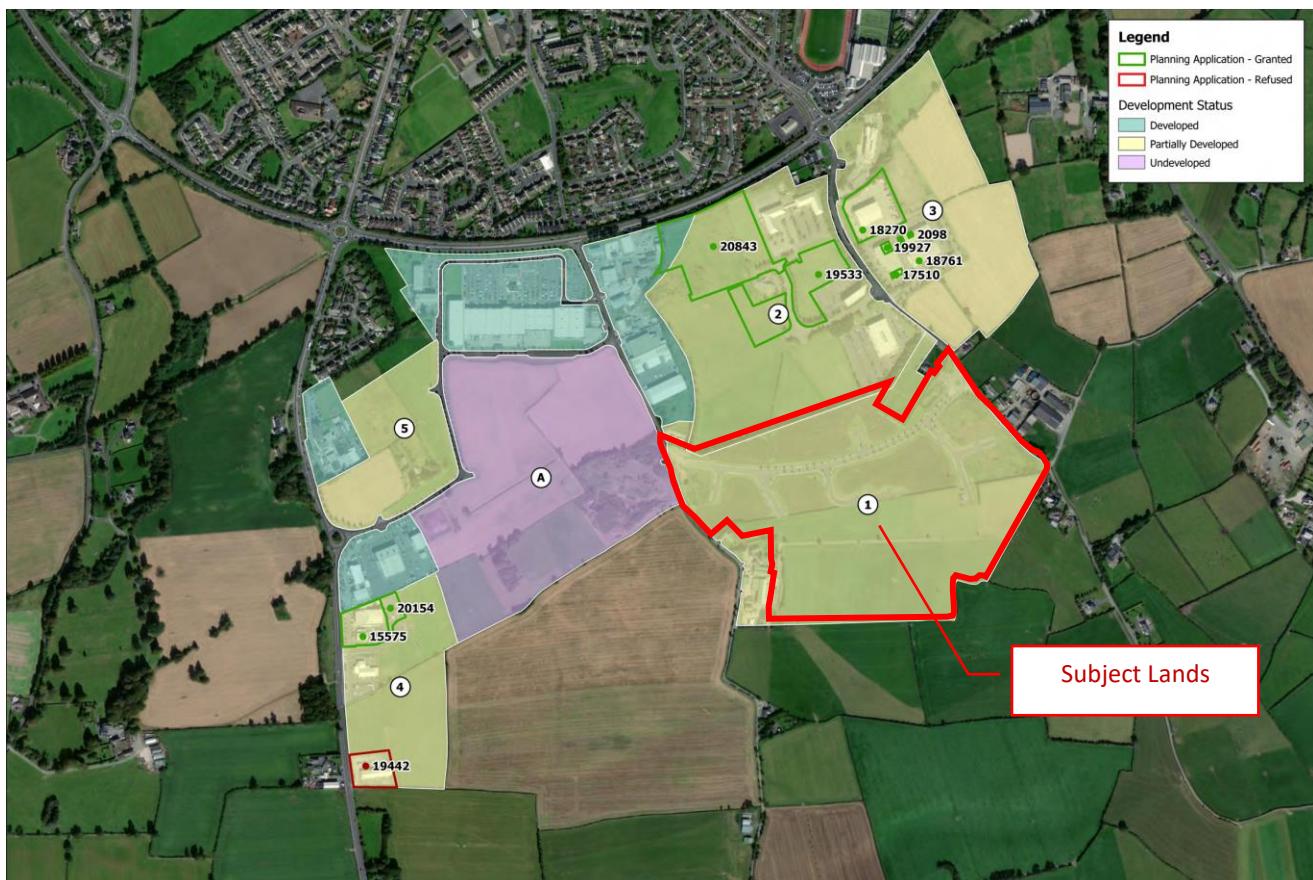


Figure 6.4: Map Indicating Level of Development within Cluster I. (Source: TPA 2021.)

The associated Table 6.1 below relating to 'Cluster I', indicates the remaining land capacity within each of the employment sites within this cluster. It can be seen from the table that, the subject site 'Ref 1' consists of a majority of its lands which are undeveloped.

This indicates that there is capacity for the subject lands to accommodate a rezoning to 'Industrial/Technology Park'. Owing to the location of the subject lands directly south of the existing lands zoned 'Industrial/Technology Park', the subject site would act as a natural extension to these lands. This would prove convenient in connecting and transitioning the two lands during future development.

Table 6.1: Indicative Remaining Capacity of Cluster I

Ref	Zoning	Development Status	Site Area (ha)	Undeveloped Area (ha)	Recent Planning - See Planning List for detail.
1	Industrial/Warehousing	Partially Developed	25.3	23.7	No recent, relevant applications.
2	Industrial/Technology Park	Partially Developed	17.9	11.74	19533 - Granted 20843 - Granted
3	Industrial/Technology Park	Partially Developed	13.8	7.8	Recent applications pertain only to existing development.
4	Industrial/Warehousing	Partially Developed	7.7	5.3	Recent applications pertain only to existing development.
5	Business Park	Partially Developed	5.8	5.0	No recent, relevant applications.
6	General Business	Partially Developed	2.2	1.4	20762 - Granted Others pertain only to existing development.
A	Business Park	Undeveloped	18.9	18.9	No recent, relevant applications.

'Cluster II', is similar to 'Cluster I' in terms of zoning mix as seen from Figure 6.5 below and comprises of a mix of employment sites zoned, 'Business Park', 'Industrial/Warehousing', 'Industrial/Technology Park', and a relatively small parcel of land zoned for 'General Business'. It can be seen from Figure 6.5 that all of the lands zoned for 'Industrial/Warehousing' and 'Industrial/Technology Park', have been developed. There are no lands available adjacent to the lands zoned 'Industrial/Technology Park' within this cluster that are available to accommodate further development. The only lands left partially developed in this cluster are lands zoned 'Business Park.'



Figure 6.5: Map indicating the various employment sites within Cluster II. (Source: TPA 2021.)



The associated Table 6.2 below relating to 'cluster II', indicates that the majority of undeveloped lands are located within lands zoned 'Business Park'. The lands zoned 'Industrial/Warehousing' and 'Industrial/Technology Park', have no capacity within this cluster to accommodate further development for the respective uses as observed from a desktop survey of these lands.

Table 6.2: Indicative Remaining Capacity Cluster II					
Ref	Zoning	Development Status	Site Area (ha)	Undeveloped Area (ha)	Recent Planning - See Planning List for detail.
7	Business Park	Partially Developed	24.67	17.3	Recent applications pertain only to existing development.
8	Business Park	Partially Developed	31.48	30.5	No recent, relevant applications.
9	Business Park	Partially Developed	36.29	30.2	Recent applications pertain only to existing development.
F	Business Park	Undeveloped	2.2	2.2	1857 - Granted

Overall, it can therefore be concluded that, only 'Cluster I' has capacity within its employment sites to accommodate future development in the Technology Industry by the rezoning of the subject lands to 'Industrial/Technology Park'. This rezoning can be seen as appropriate as it will in turn support the adjacent employment sites to the north which are also zoned for the said use.



6.5 10 Minute City Concept

The subject lands are located in close proximity to the Loughboy residential neighborhood, which is located on the lands directly north of the site. It is observed from the AIRO population census (2016) visualisation map (see Figure 6.6 below) that the population distribution in Kilkenny City forms two relatively dense clusters in the south west and north east areas of the city.

The larger of these clusters is situated within close proximity of the subject lands. Therefore, it can be noted that the subject site has the potential to cater to a greater proportion of the working population in Kilkenny City.

Additionally, the map below indicates that a total no. of 3,400 residential units could be directly served within a 2km radius from the subject lands. This will provide a population of workforce within a sustainable commute of the employment lands in line with the concept of the 10 Minute City, which is being championed by Kilkenny County Council in the current *Draft Plan*, whereby residential development is located within a 10 minute walk or cycle of services and facilities and ultimately workplaces. See Figure 6.7 on the following page which illustrates a 2km zone around the subject lands.

Due to Kilkenny emerging as a Technology Hub within the region as stated in the RSES for the Southern Region, the potential growth of technology/office related employment zones should be accommodated in the review of the Development Plan.

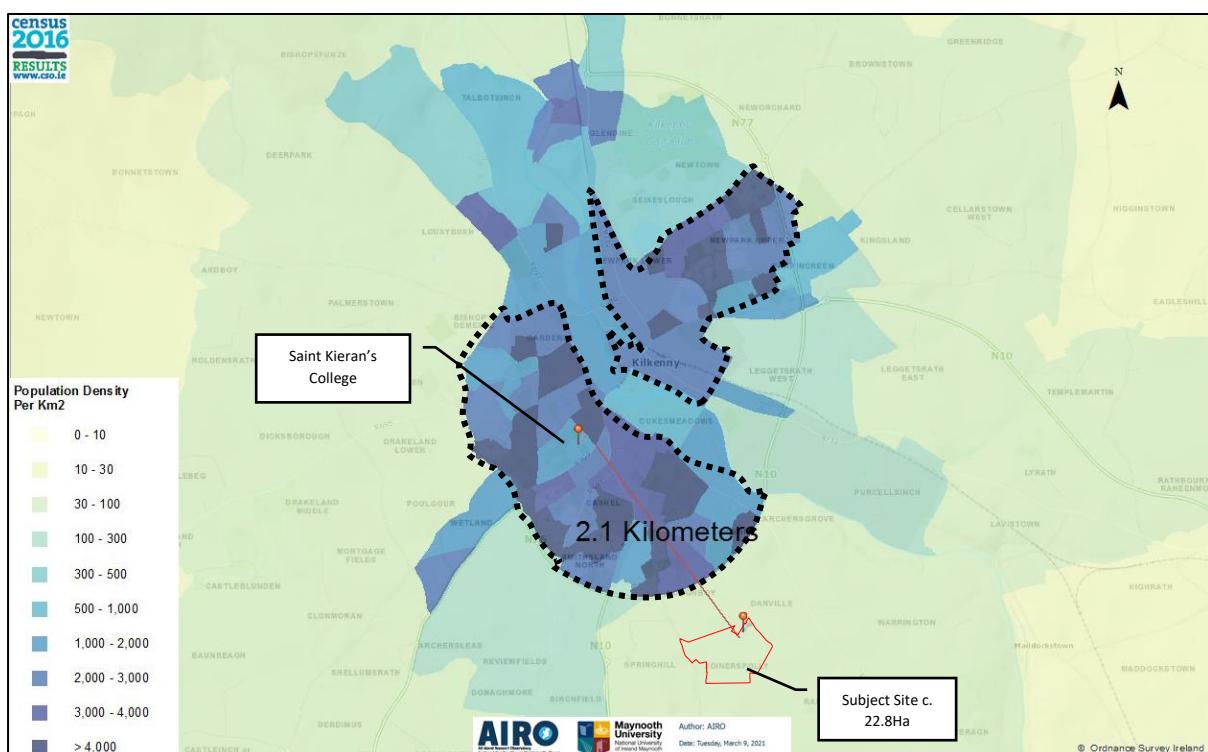


Figure 6.6: AIRO population density map of Kilkenny City indicating population clusters in relation to the subject site. (Source: AIRO, CSO data. Cropped and annotated by TPA 2021.)

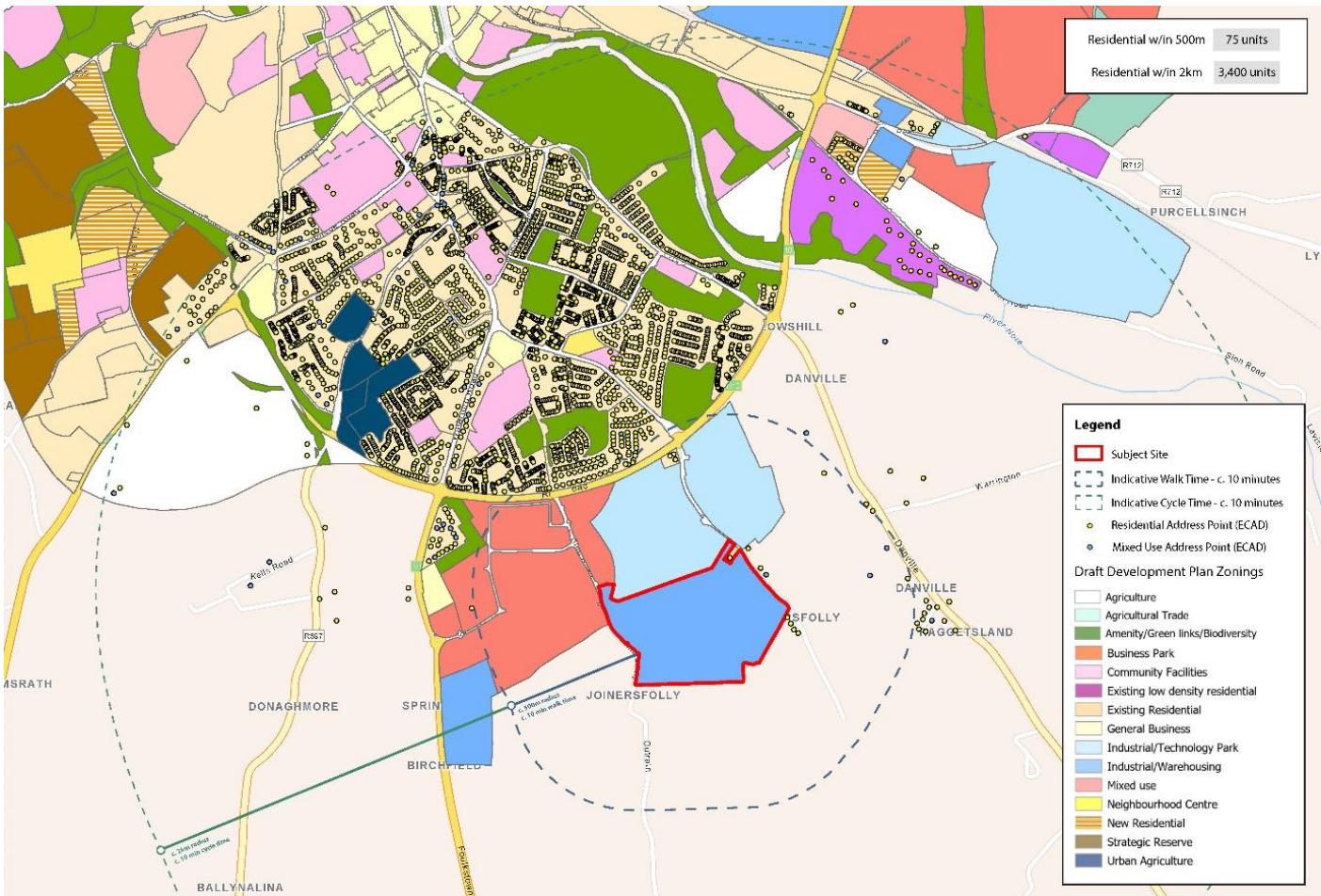


Figure 6.7: Map indicating residential development within a 500m and 2 km radius from subject site. (Source: TPA 2021)

6.5.1 Local Transport Plan (LTP)

It is identified within the *Draft KCCDP 2021-2207* that,

"The integration of land use and transportation is a fundamental principle of the National Planning Framework and the Southern Regional Spatial and Economic Strategy. The aim is to reduce the overall demand for transport by promoting a more efficient land use pattern where suitable land uses are located closer together."

Therefore, we note that it is recognised by the LTP that further provisions will be made in the County to adhere to the overall aim within the NPF and Southern RSES to reduce overall demand for transport through the following objectives stated within the Draft KCCDP 2021-2027:

1. **Support the future growth of Kilkenny City through the provision of an integrated, safe, reliable and sustainable transport network;**
2. **Reduce dependency on the private car;**
3. **Increase public transport capacity and provision to maximise catchment;**
4. **Enhance the public realm through traffic management and transport interventions**
(Our emphasis)



We understand that, Kilkenny County Council has commissioned the creation of a Local Transport Plan (KLTP) as part of the planning of the City and County Development Plan. The KLTP is envisioned as a short to medium-term initiative that will facilitate the construction of a robust, sustainable transportation network for the City from 2020 to 2026 and beyond. Therefore, there is a high probability of the subject lands being fully serviced within the life-time of the plan.

The KLTP is set to include:

1. *A review of existing priorities and develop scenarios for modelling*
2. *Transport model development*
3. *Assessment of existing trends/issues/constraints,*
4. ***Development of a range of mobility and movement interventions to support growth of the City***
5. *Review of parking standards*
6. ***An enhanced cycle network plan***
7. ***A walking network plan***
8. *Climate action, carbon and EV charging (See Volume Section 12.14 Electric Vehicles)*

(Our emphasis)

The above criteria to be addressed by the KLTP ensures that the future population growth in the city and increased dependence on public transport services due to the creation of employment lands will be accommodated.

Specifically, the bus network and rail network services for Kilkenny City are in plans to accommodate future growth and improve their services.

6.5.2 Bus and Rail Network

The Kilkenny Bus network consists of two routes, 'KK1' and 'KK2', of which,

"Both routes have circuitous alignments, designed to broaden their catchment areas including areas of high population density and low car ownership."

(Draft KCCDP 2021-2027)

Similarly, the Rail Network services to the city is in plans to accommodate increased frequency as well. It is stated within the Draft KCCDP 2021-2027 that,

"The RSES has the objective to strengthen rail connectivity, which includes increased frequency of services and reduced journey times between Waterford, Kilkenny City, Carlow and Dublin. The Council supports increased frequency of services and reduced journey times between Kilkenny City and other destinations on the Waterford/Dublin line thereby enhancing the economic corridor between Waterford Metropolitan Area and the Key towns of Kilkenny and Carlow. "

Upon conducting a review of some of the significant transport routes servicing the city, we found that the bus routes KK1 and KK2, along with Bus Eireann, Dunnes Coach ITC route and the Irish Rail are the key services providing connectivity to land uses within the city as well as inter city.



The map below (see Figure 6.9) shows the two routes KK1 and KK2 provided by the Transport for Ireland (TFI), which terminate within 500 metres of the subject site, indicating that the resources required to provide for an additional stop to the site would be minimal.

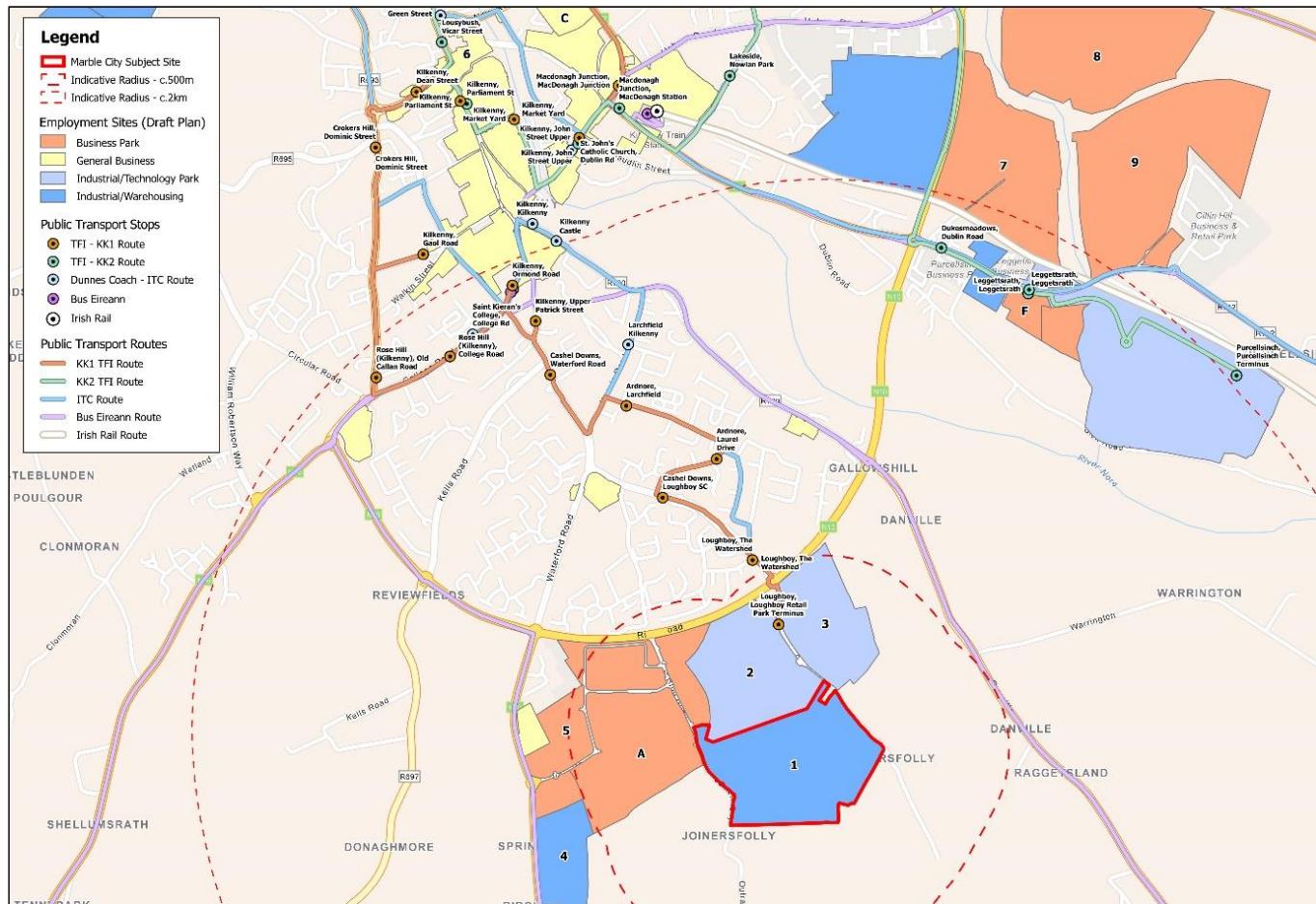


Figure 6.8: Public Transport map indicating service routes (Source: TFI, TPA, 2021.)

6.5.3 Road Network

The Draft KCCDP 2021-2027 states that the:

"Kilkenny Ring Road is a key part of Kilkenny's road network, comprising the N76, N10 and N77. This orbital route bounds most of the built up area, stretching from the south-west at Callan Road to the north at Castlecomer Road, as follows:

- *N76: Callan Road Roundabout to Waterford Road Roundabout;*
- *N10: Waterford Road Roundabout to Hebron Road Roundabout including the Ossory bridge crossing over the River Nore; and*
- *N77: Hebron Road Roundabout to Castlecomer Road Roundabout."*

The subject site is located within close proximity to the N10 Ring Road, and is connected by the Loughboy Park Road to the east and by the Ring Road to the west. Further developments to these roads are to be made according to the Draft KCCDP map showing proposed roads.

(See Figure 8.1.) Therefore, the subject site could be fully serviced during the life time of the development plan to come.

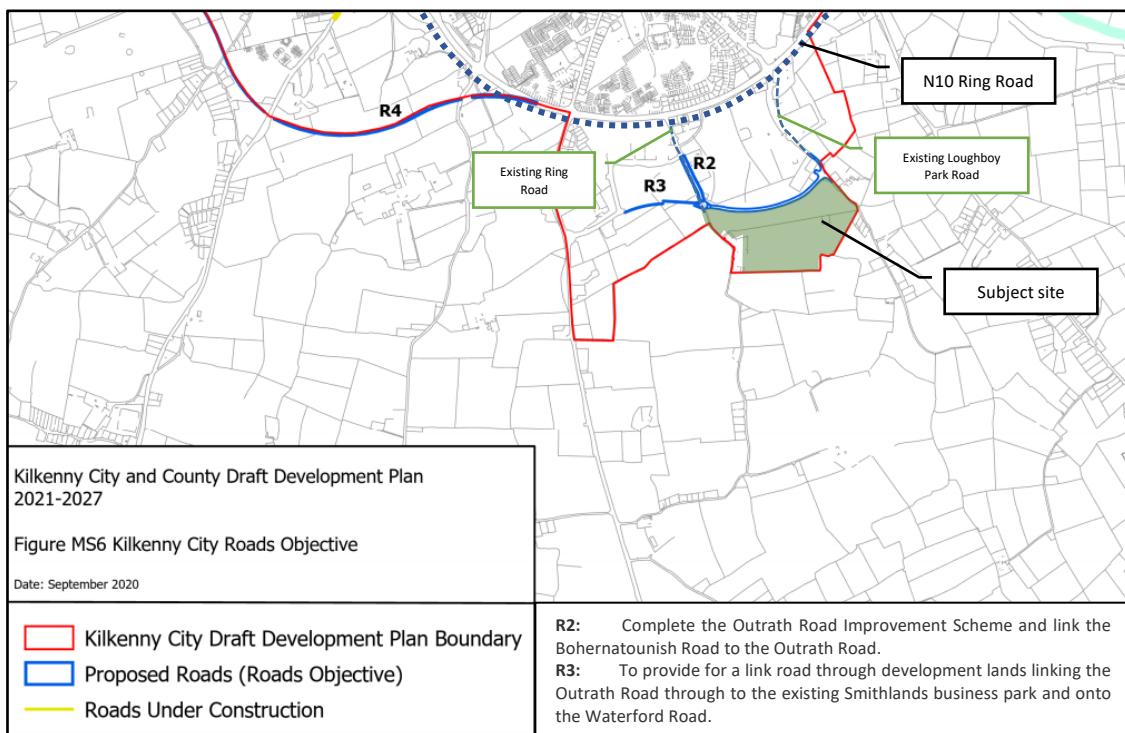


Figure 6.9: Extract from the Road Proposals Map Draft, KCCDP 2021-2027 (Source: Kilkenny County Council, Cropped and annotated by TPA, March 2021.)

Is it worth noting that the development of this site will open up the permitted east/west road through the site.

6.5.4 Pedestrian and Cycle Network

As seen from Figure 6.10, the existing cycle and pedestrian networks in the city have been integrated across the city serving lands close to the subject site. Extension of the existing cycle and pedestrian network to service the subject site would thus require minimal resources.

Additionally, the proximity to the existing cycle netowrk would allow for easier accommodation of Work Place travel plans to be set up with employers, thus reducing reliance on the private car.

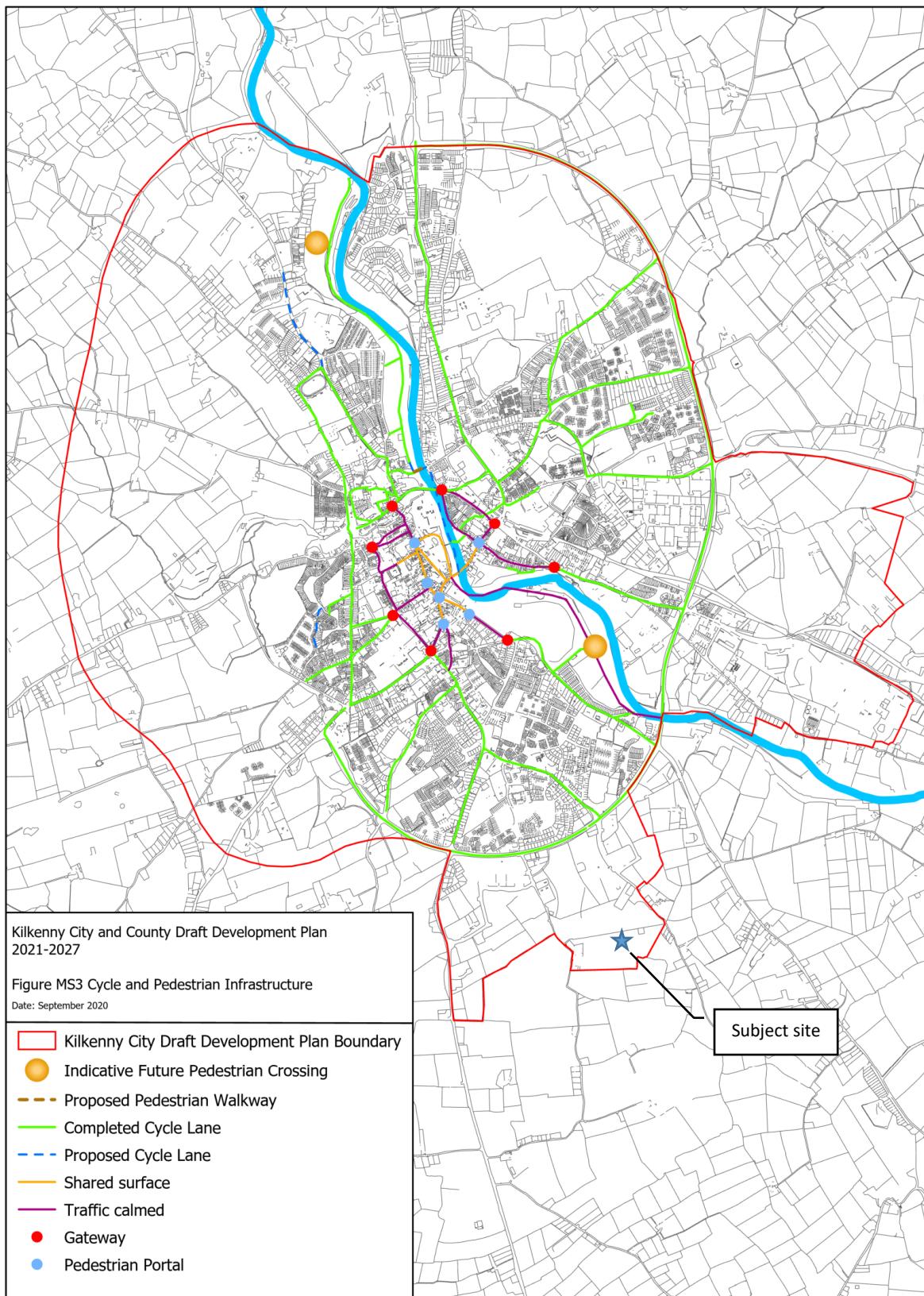


Figure 6.10: Subject lands in relation to the Pedestrian and Cycle Network map from the Draft KCCDP 2021-2027. (Source: Kilkenny County Council, 2021.)



7.0 CONCLUSION

The proposed rezoning of 50% of the site from ‘Industrial/Warehousing’ to ‘Industrial/Technology Park’ will enable a far greater range and mix of allowable uses and will support future economic and employment growth in Kilkenny. There is evidence of strong growth within business and financial services, and a decline in ‘traditional manufacturing’. This change from all an all Industrial zoning to a more Technology based zoning is supported by National and Regional Policy and by predicted economic growth patterns in the region.

The proposed rezoning from ‘Industrial/Warehousing’ to ‘Industrial/Technology Park’, represents a minimal change in land use and does not negatively impact the economic/employment status of adjoining sites.

Further, a survey of the development capacity of the employment land banks distributed across Kilkenny City (as stated within the Core Strategy of the KCEDP 2014-2020), found that the subject lands and its adjoining lands have the most capacity for further development within these lands for ‘Industrial/Warehousing’ and ‘Industrial/Technology Park’.

It has been established within the *Draft KCCDP 2021-2027* that Kilkenny is identified as home to global tech companies and start ups. Therefore, there is much growth to be expected and accommodated for in the region. Allowing for an increase in lands zoned ‘Industrial/Technology Park’ could potentially favour this growth due to the broader objective it caters to.

In relation to the servicing of the site with roads, cycling and pedestrian networks and public transport, the subject lands are set to be fully serviced during the life time of the development plan. The Kilkenny Bus network aims to expand their catchment according to population growth, and the rail network is set to integrate increased frequency of services. The existing cycle and pedestrian networks in the city have been integrated across the city serving lands close to the subject site. Extension of the existing cycle and pedestrian network would thus require minimal resources.

In conclusion, we consider the rezoning of the subject site to ‘Industrial/Technology Park’ and ‘Industrial/Warehousing’ to be the most appropriate and flexible zoning objective which conforms with all relevant planning policy. It would provide for additional development opportunity for both the lands and the Technology Industry within Kilkenny City. Growth in Technology sectors would result in increased regional expertise and ultimately secure global recognition for Kilkenny.

Yours Sincerely

A handwritten signature in black ink, appearing to read "Gavin Lawlor".

Gavin Lawlor

Director
Tom Phillips + Associates

Encl.



APPENDIX I

Summary of the status of employment sites in Kilkenny City

Marble City - Employment Sites - Indicative Remaining Capacity					
Ref	Zoning	Development Status	Site Area (ha)	Undeveloped Area (ha)	Recent Planning - See Planning List for detail.
A	Business Park	Undeveloped	18.9	18.9	No recent, relevant applications.
B	Industrial/Warehousing	Undeveloped	5.3	5.3	No recent, relevant applications.
C	General Business	Undeveloped	3.6	3.6	No recent, relevant applications.
D	General Business	Undeveloped	0.1	0.1	18716 - Granted
E	General Business	Undeveloped	0.8	0.8	No recent, relevant applications.
F	Business Park	Undeveloped	2.2	2.2	1857 - Granted
		Subtotal	30.8	30.8	

Ref	Zoning	Development Status	Site Area (ha)	Undeveloped Area (ha)	Recent Planning - See Planning List for detail.
1	Industrial/Warehousing	Partially Developed	25.3	23.7	No recent, relevant applications.
2	Industrial/Technology Park	Partially Developed	17.9	11.74	19533 - Granted 20843 - Granted
3	Industrial/Technology Park	Partially Developed	13.8	7.8	Recent applications pertain only to existing development.
4	Industrial/Warehousing	Partially Developed	7.7	5.3	Recent applications pertain only to existing development.
5	Business Park	Partially Developed	5.8	5.0	No recent, relevant applications.
6	General Business	Partially Developed	2.2	1.4	20762 - Granted Others pertain only to existing development.
7	Business Park	Partially Developed	24.67	17.3	Recent applications pertain only to existing development.
8	Business Park	Partially Developed	31.48	30.5	No recent, relevant applications.
9	Business Park	Partially Developed	36.29	30.2	Recent applications pertain only to existing development.
		Subtotal	164.9	132.9	

Total	195.7	163.8
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APPENDIX II

Survey of employment sites across the city showing development status.











APPENDIX III

Survey of social infrastructure within the context of subject site

Identified within c. 10 min Walking Time	
Category	Infrastructure
Arts, Culture and Tourism	-
Childcare	Busy Bees Creche
Education and Training	-
Community Centres and Services	Kilkenny Bridge Centre, The Hoban Hotel Conference Centre
Faith	-
Healthcare	-
Open Space, Sport and Recreation	The Watershed Sports Complex and Swimming Pool
Retail	Kilkenny Retail and Business Park, Woodie's Kilkenny
Transport	-

Identified within c. 10 min Cycle Time	
Category	Infrastructure
Arts, Culture and Tourism	Butler House and Gardens, Young Irish Film Makers, Kilkenny Castle and Gardens, Craft Council of Ireland and Gallery
Childcare	Busy Bees Creche, Little Ones Playschool, The Village Childcare, Twinkles Creche & Montessori, Kilkenny Early Years Project, Naionra Osrai Teoranta, The Montessori Academy and Creche, Square One Loughboy, Rainbow Montessori, Head Start Montessori, Tiny Tots Paradise, Lamha Beaga Childcare, Hotel Kilkenny – Drop In Centre, Marbles Creche and Montessori
Education and Training	Kilkenny Education Centre (primary and secondary), St. Patrick's De La Salle (primary), St. John of God National School (primary), Gaelscoil Osrai (primary), Kilkenny School Project (primary), St. Kieran's College (secondary), Colaiste Pobal Osrai (secondary), Kilkenny City Vocational School (secondary), Presentation Secondary School, Ormonde College (third level), VTOS Kilkenny, Bishop Birch Training Institute, St. Patrick's School (special education)



Community Centres and Services	St. Kieran's Library, St. Kieran's Library, St. Patrick's Parish Centre, Kilkenny Bridge Centre, Kilkenny County Girl Guides, 1 st Kilkenny Scouts, The Hoban Hotel Conference Centre, Loughboy Post Office
Faith	Foulkstown Church, St. Fiarcre's Church, St. Patrick's Church, St. Patrick's Centre, St. Joseph's Missionary, Peace in Christ Community Centre, St. Patrick's Graveyard, Kilkenny Castle Graveyard, Foulkstown Cemetery, Kilmalog Church Graveyard
Healthcare	St. Canice's Psychiatric Hospital, Loughboy Medical Centre, The Springhill Clinic, Kilkenny Osteopathic Clinic, The Vision Centre, Irish Wheelchair Association, McCauley Pharmacy
Open Space, Sport and Recreation (selected)	Hotel Kilkenny Leisure Club, Springhill Court Conference Leisure & Spa, St. Kieran's College Gym, The Watershed Sports Complex & Swimming Pool, Kilkenny Gymnastics Academy, Lacken Pitch & Putt Club, James Stephen's GAA Club, Kilkenny County & City Lawn Tennis Club, Kilkenny Aqua Canoe Club, Kilkenny Rugby Club, Nore Valley Walk Trailhead, Tree Grove Caravan and Camping Park, Danville House Farm and Equestrian, Warrington Top Flight Equestrian Centre, Castle Park, James Stephen's Park Hollybank Park, The Quarry Park, Butler House Gardens, Rose Hill Playground, Castle Park Playground
Retail and Convenience (selected)	Kilkenny Retail & Business Park, Smithlands Centre, Supervalu, Aldi, Lidl, Topaz, Esso, Applegreen, Woodie's Kilkenny, Chadwick's
Transport	-