

Kilkenny City and County Draft Development Plan 2021-2027

Chief Executive's Report

**Report of the Chief Executive on Submissions to the Draft Kilkenny City & County
Development Plan 2021-2027**



Date: 25th May 2021

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1 Introduction

This Report forms part of the statutory procedure for the preparation of a Development Plan, as required by the Planning and Development Act, 2000, as amended.

The purpose of this Report is -

- To report on the written submissions/observations received in relation to the Draft Kilkenny city and County Development Plan during the public consultation period which ran from the 22nd of December 2020 to the 12th of March 2021.
- To set out the Manager's response to the issues raised in the submissions/observations and;
- To make recommendations to the members on the issues arising from the consultation process.

The Report is now submitted to the Members for their consideration.

1.1 Details of Public Display

The documents put on public display for the Plan were:

- **Draft Kilkenny City and County Development Plan, Volumes 1 (Kilkenny County) and 2 (Kilkenny City) with the following Appendices:**
 - A Retail strategy
 - B Housing Strategy
 - C Recreational Walking Trails and Public rights of Way
 - D County Geological sites
 - E Tree Preservation Orders
 - F Survey of Mature Trees
 - G List of Native Trees and Shrubs
 - H Protected Views and Prospects
 - I and J Records of Protected Structures for County and City respectively
 - K Wind Energy Development Strategy
 - L Statement outlining compliance with Ministerial Guidelines
 - M Key Development Plan Objectives
 - N Infrastructure Assessment
- **Strategic Environmental Assessment Report incl. Strategic Flood Risk Assessment**
- **Natura Impact Report**

The documents went on public display for a period of 11 weeks and 3 days (minimum statutory period of 10 weeks) on our public consultation portal **Consult.Kilkenny.ie** from the 22nd of December 2020 to 12th March 2021. Hard copies of the documents were made available for public display in all the County Libraries subject to Covid-19 protocols in place during the display period.

1.2 Public Engagement

Due to Covid -19 restrictions, face to face public consultation meetings could not take place as per the norm for previous plans. During the public display period however the Planning section undertook several public consultation exercises which took the form of free online meetings via the MS Teams platform. These meetings were widely publicised and a notice was placed in the *Kilkenny People* in January with links to online registration via Eventbrite. The meetings took place as below:

Monday 25th of January 2021 at 19.00	Overall Core Strategy and Housing
Monday 1st of February 2021 at 19.00	Economic Development inclusive of retail strategy and tourism
Thursday 4th of February 2021 at 19.00	Climate Change, Renewable Energy and Transport
Monday 8th of February 2021 at 19.00	Natural and Built Heritage, Placemaking and all other issues

Additional meetings were held with specific focus groups as follows:

- **Comhairle na nÓg – 28th of January 2021**
- **Older Persons Forum – 3rd of February 2021 and 17th of February 2021**
- **Public Participation Network (PPN) - 10th of February 2021**
- **Kilkenny Chamber of Commerce - 25th of February 2021**

1.3 Rooms Website

The Forward Planning section developed an interactive overview of the Plan, using an Innovision website, to encourage further engagement with the Draft Plan (<https://www.innovision.ie/kilkenny-cdp>). This website took the form of a Virtual Public Exhibition and included a synopsis of each chapter of the Draft Plan.

1.4 Ourplan Website

A dedicated website was developed for all stages of the Kilkenny City and County Draft Development Plan 2021-2027, known as 'Our Plan'. This website provided updates and information on each stage of the Development Plan process.

1.5 Social Media

The social media platforms of Facebook and Twitter were heavily utilised prior to and throughout the public consultation period of the Draft Kilkenny City and County Development Plan.

From the 20th January to the 8th February a total of 17 posts were shared on Facebook and Twitter. The initial post set out details of the four events including date, time and topic including an active link to the Eventbrite registration page to allow individuals to register for any or all of the events. The subsequent posts promoted the upcoming event and also included a link to the registration page for that specific event. On the day of each event a reminder post was also shared on each platform.

The final post shared on social media included a link to the live recordings of each public meeting. The recording of each event was uploaded onto the designated online consultation page on consult.kilkenny.ie for members of the public to view.

To ensure the registration process for members of the public was seamless and straightforward each post shared on social media included a direct link to the Eventbrite registration page. To gain additional attention the posts included an image of the Draft development plan cover page.

When creating the events on Eventbrite we opted in to send registered users a reminder email a number of hours prior to event. Given some individuals may have registered for events two weeks in

advance it was presumed a reminder email would be particularly beneficial to those. The registration for each event remained opened throughout the event to give individuals the opportunity to register to attend the meeting at any point.

2 Submissions Received

As the plan was displayed on the Council's online portal, by registering online at **<https://Consult.Kilkenny.ie/>**, submissions could be made on the draft by chapter, topic and map sheet. Submissions could also include drawings of any areas relating to the submission or could be made on an interactive Development Plan map.

Submissions to the plan could be made either:

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

In total 463 submissions were received by Kilkenny County Council to the Draft Kilkenny City and County Development Plan, as set out below¹.

¹ The full text of the submissions received are available to view at the following link: <https://consult.kilkenny.ie/en/node/2915/submissions>

Table 1: List of submissions received to the Draft City and County Development Plan

Ref. No	Name/Group
KKC162-1	Peter Purcell
KKC162-2	Mairead Eoin
KKC162-3	KSM Ventilation
KKC162-4	EPA
KKC162-5	Derek Morrissey
KKC162-6	DECC
KKC162-7	Nuala Cuffe
KKC162-8	Ormonde Street Car Park
KKC162-9	Margaret Tobin
KKC162-10	Anne Baily
KKC162-11	Donal Higgins
KKC162-12	Robert Pearson
KKC162-13	Daniel O' Mahoney
KKC162-14	Aisling Freaney
KKC162-15	Cora Freaney
KKC162-16	Anna Morrissey
KKC162-17	Donal Deering
KKC162-18	Paudie O' Niell
KKC162-19	Paudie O' Niell
KKC162-20	Eastern Midlands Regional Assembly
KKC162-21	Tullahought Tidy Towns
KKC162-22	Sheenagh Raggett
KKC162-23	Mark Collins
KKC162-24	Zoe Freaney
KKC162-25	Ahenny Action Group
KKC162-26	Genieve and William Cody
KKC162-27	TII
KKC162-28	Ed O'Shea
KKC162-29	Port of Waterford
KKC162-30	O'Loughlins Gaels GAA Club
KKC162-31	Caiseal Conservation Committee
KKC162-32	The Village Business Campus
KKC162-33	Tom Morrissey
KKC162-34	Thomas & Anne Hearne
KKC162-35	Ger Lyster
KKC162-36	Ger Blanchfield
KKC162-37	Colette Hogan
KKC162-38	John Blanchfield
KKC162-39	Mary Blanchfield
KKC162-40	Lingaun Valley Tourism CLG
KKC162-41	Genieve and William Cody
KKC162-42	Lorraine Maher
KKC162-43	Tara Heavey

KKC162-44	Mark Lonergan
KKC162-45	Kevin Healion
KKC162-46	Paul Cummins
KKC162-47	Suir Valley Env Group
KKC162-48	Brock McClure on behalf of Marie Brannigan
KKC162-49	Whyte Pl Consultants on behalf of Daniel Fogarty
KKC162-50	Richard Walsh
KKC162-51	Paul Brophy (Carlow Kilkenny FC)
KKC162-52	Peter Thomson on behalf of Garrett O' Carroll
KKC162-53	Peter Thomson on behalf of John Ryan
KK-C162-54	Antoin O'Niell
KK-C162-55	Declan Blanchfield
KK-C162-56	Patrick Dalton PP
KK-C162-57	Philip Fennelly
KK-C162-58	Seville Lodge
KK-C162-59	Neal McCormack
KK-C162-60	O'Neill Consultants on behalf of Michael Keogh
KK-C162-61	Eoin Molloy
KK-C162-62	Rebecca Linares
KK-C162-63	St. Johns FC
KK-C162-64	SLR on behalf of Belgard Estates Ltd
KK-C162-65	Department of Transport
KK-C162-66	Keep Ireland Open
KK-C162-67	Trustees of St. Kierans College
KK-C162-68	Leo and Kay Cody
KK-C162-69	Edmond Cody
KK-C162-70	SLR Consulting on behalf of Roadstone Ltd
KK-C162-71	Brock McClure on behalf of IMC Cinema
KK-C162-72	Peter Thomson on behalf of Michael and Sheila Foley
KK-C162-73	Peter Thomson on behalf of St. Johns School
KK-C162-74	Dicksboro Camogie Club
KK-C162-75	Newpark AFC
KK-C162-76	Feargall Kenny on behalf of Michael Angim
KK-C162-77	Feargall Kenny on behalf of Michael Angim
KK-C162-78	ARUP
KK-C162-79	Mairead Sheehan
KK-C162-80	Teresa and John Sheehan
KK-C162-81	Ann Kenny
KK-C162-82	Paul Ryan
KK-C162-83	Seamus Norris
KK-C162-84	Eileen Grace
KK-C162-85	Nicola Cummins
KK-C162-86	Andrew Fitzsimons
KK-C162-87	Marilyn Young
KK-C162-88	Peter Thomson on behalf of Sean McMullan
KK-C162-89	Shane Campion
KK-C162-90	James & Nancy Hearne
KK-C162-91	Alice Alyward

KK-C162-92	Canice Coogan
KK-C162-93	Brian Malone
KK-C162-94	Robert Power
KK-C162-95	Lena Power
KK-C162-96	Brendan Alyward
KK-C162-97	Maurice Murphy
KK-C162-98	Freida Campion
KK-C162-99	Shane Alyward
KK-C162-100	Breda Murphy
KK-C162-101	John O' Mahony
KK-C162-102	Kelly Allen
KK-C162-103	Pol Brennan
KK-C162-104	Robert Alyward
KK-C162-105	Alex Wilsdon Jnr
KK-C162-106	Paul Murphy, John Holohan, Tim Sherman and PJ Murphy
KK-C162-107	Mary Molloy
KK-C162-108	Liam Scott on behalf of Kilkenny & Carlow Ed and Training Board
KK-C162-109	Noel O'Keefe
KK-C162-110	Seamus Phelan
KK-C162-111	Willie and Rhona Dempsey
KK-C162-112	Kilkenny City Vocational School
KK-C162-113	James Thompson
KK-C162-114	Tom Keogh
KK-C162-115	Philip Brennan
KK-C162-116	Francis O' Mahoney
KK-C162-117	Orla Skehan
KK-C162-118	Jean Strong on behalf of Whisperview Trading & Carriganog Racing
KK-C162-119	MJBE Investments 3 Limited
KK-C162-120	Christina Walsh
KK-C162-121	Tony Musiol
KK-C162-122	Trish Morahan and Mark Collins
KK-C162-123	Carmel Furlong
KK-C162-124	LOU Investments
KK-C162-125	Kieran Furlong
KK-C162-126	Cindy Alyward
KK-C162-127	Caroline Cahill
KK-C162-128	David Harrington
KK-C162-129	Irene Kiely
KK-C162-130	Jamie Fennelly
KK-C162-131	Willie Dempsey
KK-C162-132	Rhona Dempsey
KK-C162-133	Anne O' Mahoney
KK-C162-134	Kaya Brennan
KK-C162-135	Eugene Duggan
KK-C162-136	Mary Duggan
KK-C162-137	Amy Duggan
KK-C162-138	Angela Walsh

KK-C162-139	Sean Kennedy
KK-C162-140	Paul Walsh
KK-C162-141	Rebecca Duggan
KK-C162-142	John Lawlor
KK-C162-143	Paula McGrath
KK-C162-144	Esther Kennedy
KK-C162-145	Breda & Aiden Slane
KK-C162-146	Paul Cotter
KK-C162-147	Aoife and Eoin C
KK-C162-148	Alex Wilsdon Jnr
KK-C162-149	Michael Cullen
KK-C162-150	Cliona Geraghty
KK-C162-151	Cunnane Stratton Reynolds Ltd
KK-C162-152	Andrew & Fiona Maloney
KK-C162-153	Mary Kelly
KK-C162-154	Damien Dempsey
KK-C162-155	Mark Wilschut
KK-C162-156	Irish Concrete Federation (Liam Smyth)
KK-C162-157	Treasurer Kilkenny GAA
KK-C162-158	Claire, Desmond and Caithlin Dalton
KK-C162-159	Erica McNiece
KK-C162-160	Peter Thomson on behalf of Castletown Cox Estate
KK-C162-161	St. Fenans GAA Club
KK-C162-162	Aodán Ó Ruairc
KK-C162-163	Anita Marnell
KK-C162-164	Peter Thomson on behalf of Shankill Estate
KK-C162-165	Peter Thomson on behalf of Moore and Ragett
KK-C162-166	Mary Harrington
KK-C162-167	Fiona O' Sullivan
KK-C162-168	Peter Thomson on behalf of Kevin Moore
KK-C162-169	Glendine Heights Association
KK-C162-170	Colin Fennelly
KK-C162-171	Emma Fortune
KK-C162-172	Irish Thoroughbred Breeders' Association and Irish Racehorse Trainers' Association
KK-C162-173	OPW
KK-C162-174	Jane Power
KK-C162-175	Josie Grace
KK-C162-176	Kilmacow Hurling & Football Club
KK-C162-177	St Canices FC
KK-C162-178	Bridget Finnerty
KK-C162-179	JETO Properties Ltd
KK-C162-180	Michelle Cullen
KK-C162-181	Rath Ullord Residents Association
KK-C162-182	Alexander Walsh
KK-C162-183	Gillian Griffin
KK-C162-184	Michael Holland

KK-C162-185	Caroline O'Keefe
KK-C162-186	Shane O'Keefe
KK-C162-187	Alex Wilsdon Jnr
KK-C162-188	Alex Wilsdon Jnr
KK-C162-189	James Cullen
KK-C162-190	Robbie Allen
KK-C162-191	Bernie Joyce
KK-C162-192	Lisa O'Connor
KK-C162-193	Aine Consulting
KK-C162-194	Joe Mulhall
KK-C162-195	Vincent Kiely
KK-C162-196	Eamonn Bookle
KK-C162-197	Pat & Therese Hearne
KK-C162-198	Martin O'Brien
KK-C162-199	Patrick Bookle
KK-C162-200	Noleen Bookle
KK-C162-201	Philip Brennan
KK-C162-202	Thomas Bookle
KK-C162-203	Linda Murray
KK-C162-204	Jessica Carroll
KK-C162-205	Patrick Brennan
KK-C162-206	Walter Power
KK-C162-207	Louise Mason
KK-C162-208	Philomena Cronin
KK-C162-209	HSE
KK-C162-210	Reuben Allen Grace
KK-C162-211	Tim Gilchrist
KK-C162-212	Paddy Cronin
KK-C162-213	Kilkenny RFC
KK-C162-214	Marie Fitzpatrick
KK-C162-215	Vincent O' Shea
KK-C162-216	Mary O'Shea
KK-C162-217	Rita Kennedy
KK-C162-218	Tullaroan GAA Club
KK-C162-219	Justin Moore
KK-C162-220	Frank Walsh
KK-C162-221	John Dermody
KK-C162-222	Paschal Ryan (Spa united AFC)
KK-C162-223	Tom Philips and Associates
KK-C162-224	Anthony Cottrell
KK-C162-225	Bernadette Kennedy
KK-C162-226	Ballagh Holdings Ltd
KK-C162-227	David Rouse
KK-C162-228	Martin Doheny
KK-C162-229	Dorothy Allen

KK-C162-230	Aiden Collins (Lightsource BP)
KK-C162-231	Rebecca Walsh
KK-C162-232	HRA Planning
KK-C162-233	Martin Bookle
KK-C162-234	Sisters of St. John of God
KK-C162-235	Danny Walsh
KK-C162-236	Development Applications Unit (DAU)
KK-C162-237	Yasmine Cullen
KK-C162-238	Art Generation
KK-C162-239	Kilkenny Hockey Club
KK-C162-240	Barry Fitzpatrick
KK-C162-241	Peter Thomson
KK-C162-242	Tom Fitzpatrick
KK-C162-243	Kilkenny Age Friendly
KK-C162-244	Kilkenny GAA County Junior Board
KK-C162-245	Kilkenny Stars Basketball Club
KK-C162-246	Noreen Smith
KK-C162-247	Eirgrid
KK-C162-248	Irish Wheelchair Association
KK-C162-249	Colaiste Pobail Osrai
KK-C162-250	Martin Whitty
KK-C162-251	Irish Wheelchair Association
KK-C162-252	Waterford Golf Club
KK-C162-253	Irish Wheelchair Association
KK-C162-254	Mark Bannon on behalf of Raggett Homes
KK-C162-255	Nina Peaker
KK-C162-256	Breda and Denis Deasy
KK-C162-257	O'Loughlins Gaels GAA Club
KK-C162-258	Henry Shefflin
KK-C162-259	Kilkenny LGFA
KK-C162-260	Helen Dermody
KK-C162-261	Peter Thomson on behalf of O'Sheas Farm
KK-C162-262	Peter Thomson on behalf of O'Sheas Farm
KK-C162-263	Patrick Dowling
KK-C162-264	Martin Gittens on behalf of Westcourt Healthcare Ltd
KK-C162-265	An Taisce
KK-C162-266	Mervyn and Nicola Briscoe
KK-C162-267	Tom Philips and Associates
KK-C162-268	Padraic and Yvonne Treacy
KK-C162-269	Marion Acreman
KK-C162-270	Niamh Smith
KK-C162-271	Ollie and Carmel Harrington
KK-C162-272	Tom Philips and Associates on behalf of Ormoinde Construction Ltd
KK-C162-273	Castlecomer Discovery Park
KK-C162-274	Rebecca Turbitt McEvoy

KK-C162-275	Veronica Smith
KK-C162-276	Catriona Carroll, Save the South Leinster Way Group
KK-C162-277	Seamus Walsh
KK-C162-278	Mairead Eoin
KK-C162-279	Catherine and Alan Carroll
KK-C162-280	Elaine Aylward
KK-C162-281	Thomas Cunniffe
KK-C162-282	Tom Philips and Associates on behalf of Jangate Ltd
KK-C162-283	Tom Grace
KK-C162-284	Niall Kinsella
KK-C162-285	Aine Knox
KK-C162-286	Catriona Carroll
KK-C162-287	Christy English
KK-C162-288	John & Mary Phelan
KK-C162-289	Eilis Bergin
KK-C162-290	Tom Dowling
KK-C162-291	Mark Girling
KK-C162-292	Catherine O'Brien
KK-C162-293	Mark Girling
KK-C162-294	Frank O'Keefe
KK-C162-295	An Post
KK-C162-296	Deirdre O'Mahoney
KK-C162-297	Robert Challoner
KK-C162-298	Marian Kendrick
KK-C162-299	Patrick Lydon
KK-C162-300	Patrick Lydon
KK-C162-301	Dicksboro GAA Club
KK-C162-302	Gas Networks Ireland
KK-C162-303	Thomas and Nichola Barry
KK-C162-304	Orlaith Treacy
KK-C162-305	PJ Liston
KK-C162-306	Charlotte Shilabeer
KK-C162-307	Irish Architects Declare
KK-C162-308	Madeleine Carroll
KK-C162-309	David and Deirdre Walsh
KK-C162-310	Eoin Smith
KK-C162-311	Ciara Ann Smith
KK-C162-312	Harmony Solar Ireland Ltd
KK-C162-313	Kilkenny County Board
KK-C162-314	RWE Renewables Ireland Ltd
KK-C162-315	Kilkenny Cycling and Walking Campaign
KK-C162-316	Rosie Lynch
KK-C162-317	Rosie Lynch
KK-C162-318	Ballyragget Community Hall
KK-C162-319	ESB

KK-C162-320	Shane Alyward
KK-C162-321	Conor Foley
KK-C162-322	Natural Forces Ireland
KK-C162-323	Micheal Bookle
KK-C162-324	Andy Murphy
KK-C162-325	Christine & Gerard Byrne
KK-C162-326	David Tennyson
KK-C162-327	Freshford Garages Ltd
KK-C162-328	Martin Rochford
KK-C162-329	Monica Mullen
KK-C162-330	Irish water
KK-C162-331	Tesco Ireland
KK-C162-332	McCutcheon Halley Planning on behalf of Glenveagh Properties
KK-C162-333	Aiden Clancy
KK-C162-334	Lucy Glendinning
KK-C162-335	Mark O' Duffy
KK-C162-336	Bord na Móna
KK-C162-337	Ann Marie and Barrie Garbutt
KK-C162-338	Shane Alyward
KK-C162-339	Kilreee Partnership
KK-C162-340	Mark Anthony McGrath
KK-C162-341	Vanessa Liston
KK-C162-342	Kilree Partnership
KK-C162-343	Nicola Ryan
KK-C162-344	Eithne Lacey
KK-C162-345	Brian O'Reilly
KK-C162-346	James Kelly
KK-C162-347	Claire Molloy
KK-C162-348	Liam Fennelly
KK-C162-349	Jennifer McIntyre
KK-C162-350	Pauline and Leonard O' Shea
KK-C162-351	Eoghan Kinane
KK-C162-352	Kieran Butler
KK-C162-353	Clara GAA
KK-C162-354	Ecopower Ltd
KK-C162-355	Southern Region Waste Management Planning Office
KK-C162-356	Peter Thomson on behalf of Kilkenny Cooperative Livestock Market Limited
KK-C162-357	Carrick-on-Suir Tourism and Economic Development Committee
KK-C162-358	Josephine Rohan
KK-C162-359	Evergreen FC Submission
KK-C162-360	Brendan Barry
KK-C162-361	Martin and Lorraine Bookle
KK-C162-362	Wyn Mathias
KK-C162-363	Kilkenny Green Party
KK-C162-364	Suzanne Finnerty
KK-C162-365	Kilkenny LGFA

KK-C162-366	Linda Healy
KK-C162-367	James Stephens GAA Club
KK-C162-368	Mark Bannon on behalf of Raggett Homes
KK-C162-369	Windgap GAA Club
KK-C162-370	Coillte
KK-C162-371	Ballyragget Playground Committee
KK-C162-372	Kilkenny IFA
KK-C162-373	Finola Walsh
KK-C162-374	Helen Bacon
KK-C162-375	James Gannon
KK-C162-376	Cathal Phelan
KK-C162-377	Paul Crowley
KK-C162-378	Kilkenny Recreation & Sports Partnership
KK-C162-379	Helen and Nicky Hawe
KK-C162-380	Carrickshock GAA Club
KK-C162-381	Mooncoin GAA Club
KK-C162-382	Cloneen GAA Club
KK-C162-383	Keep Kilkenny Beautiful
KK-C162-384	Cummins & Voortman on behalf of Canview Ltd
KK-C162-385	Eamon Holden
KK-C162-386	Failte Ireland
KK-C162-387	Kelleher Architecture on behalf of Messrs
KK-C162-388	John and Alice Culleton
KK-C162-389	Cllr Martin Brett
KK-C162-390	Sheehy Pharmacy
KK-C162-391	EDF Renewables Ireland
KK-C162-392	P&M Cantwell
KK-C162-393	James Stephens Squash Club
KK-C162-394	Atlantic Infrastructure Partners
KK-C162-395	Eurospar
KK-C162-396	IDA
KK-C162-397	Cllr Patrick O'Niell
KK-C162-398	Margaret Doyle
KK-C162-399	Synergy Group Castlecomer
KK-C162-400	Lidl
KK-C162-401	Jimmy Walsh
KK-C162-402	Richard Kenneally
KK-C162-403	Sue Bowden
KK-C162-404	Southern Regional Assembly
KK-C162-405	Breda Deasy
KK-C162-406	Kilkenny Chamber of Commerce
KK-C162-407	St Lachtains Gaa Club
KK-C162-408	Kilkenny GAA
KK-C162-409	Carlow Kilkenny Labour Party
KK-C162-410	Vincent Comerford
KK-C162-411	Peter Anthony Smith

KK-C162-412	Andrew Bowden
KK-C162-413	Spa Development Association
KK-C162-414	Department of Education
KK-C162-415	Wind Energy Ireland
KK-C162-416	Kilkenny PPN
KK-C162-417	Tullagher Rosbercon GAA Club
KK-C162-418	OPR
KK-C162-419	NTA
KK-C162-420	Michael Cullinane
KK-C162-421	Enerco Energy Ltd
KK-C162-422	Catriona Fennelly
KK-C162-423	Rosbercon Residents Group
KK-C162-424	Irish Green Building Council
KK-C162-425	Kieran Butler
KKC162-426	Brian Hennessy
KKC162-427	Kathleen Duffy
KKC162-428	Ballyragget Development Association
KKC162-429	Ballyragget Historical Society
KKC162-430	Noreen Harty
KKC162-431	G. Sarah Power
KKC162-432	Alana Power
KKC162-433	Geraldine Power
KKC162-434	Freshford.ie
KKC162-435	Patrick Tallis
KKC162-436	James O'Byrne and Bridget O'Byrne
KKC162-437	Bridget Finnerty
KKC162-438	Olivia Downes
KKC162-439	Newpark Residents Association
KKC162-440	Brenda Jackson
KKC162-441	Adam Cullen
KKC162-442	Mountain Grove Loop Walk Committee
KKC162-443	Liam, Ronan and Mary Ryan
KKC162-444	Eileen Curtis, Kilkenny and Carlow Education and Training Board
KKC162-445	Shane Phelan
KKC162-446	Paddy O'Keefe
KKC162-447	Molly O'Keefe
KKC162-448	Robert G Duggan
KKC162-449	Freebooters AFC
KKC162-450	Michael Cody
KKC162-451	Jim Aylward
KKC162-452	Edward Fennelly
KKC162-453	Rory and Mary Dicker
KKC162-454	John & Philomena Knox
KKC162-455	Amanda Gannon
KKC162-456	Melissa Norris
KKC162-457	Templeorum Env Group
KKC162-458	Jim Brogan on behalf of Mary & Jacinta Fitzgerald
KKC162-459	Submission from Numerous Individuals

KKC162-460	John Spain Associates on behalf of Cairn Homes
KKC162-461	Maureen Cotterell
KKC162-462	Stepahnie Kenny
KKC162-463	Lynda Cotterell

In the 'Chief Executive's Recommendation' section any proposed new text to the Development Plan *is shown in italics* and deletions are shown as a ~~striketrough~~.

Section 2A of the report deals with all the submissions from the statutory agencies, Government Departments and regulatory bodies.

Section 2B deals with all other submission to the Draft Plan.

Due to the level of submissions in relation to the wind energy strategy these have been grouped together and the response to these submission has been collated into **Section 3** Wind Energy Strategy.

2.1 Section A: Submissions from Prescribed Bodies

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
KKC162-4	Environmental Protection Agency (EPA)	<p>1.The EPA attached a guidance document '<i>SEA of Local Authority Land Use Plans – EPA Recommendation and Resources.</i>' This document sets out the EPA key recommendations for integrating environmental considerations into Local Authority Land Use Plans.</p> <p>2.KCC should ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the NPF and the RSES.</p>	<p>1.Noted.</p> <p>2.The Plan is aligned to national policy.</p>
KKC162-6	Geological Survey Ireland, division of Department of Environment, Climate and Communications (DECC)	<p>1.GSI request the existing policy in Section 9.2.4 is included as an objective</p> <p>2.GSI requests the inclusion of a policy objective to protect County Geological sites from inappropriate development and protect geological NHAs as they become designated</p> <p>3.KCC to ensure that geological audit information is easily available to the general public</p> <p>4.GSI encourages geology to be a significant part of any tourism initiative introduced</p> <p>5.'Stone Built Ireland' a 2-year research collaboration by GSI may be of use in the future for built heritage</p>	<p>1.The wording is a statement of policy and not an objective.</p> <p>2.Noted.</p> <p>3.Noted.</p> <p>4.Geological sites are shown in Map 9.1 and based on the GSI mapping.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>6.GSI encourages the use of their geological mapping programme for future assessments</p> <p>7.It is recommended to use GSI Geothermal Suitability maps in Section 11.9 to determine the most suitable type of ground source heat collector for use with heat pump technologies.</p> <p>8.To benefit the CDP geothermal energy strategy the GSI suggest the following documents <i>The Assessment of Geothermal Resources for District heating in Ireland</i> and the <i>Roadmap for a Policy and Regulatory framework for Geothermal Energy in Ireland</i>.</p> <p>9.The GSI would welcome the consideration of aggregate potential sterilisation included as part of the CDP.</p>	<p>7.Recommendation: A reference to the GSI Geothermal mapping is included in Section 11.9 and this is considered sufficient.</p> <p>8.Recommendation: These documents will be referenced in the Section for District Heating to be included in Section 11.6 Bioenergy.</p> <p>9.This comment is noted. This will be considered on a case by case basis having regard to the particular circumstances. It is considered a written Development Management Requirement is not required in the Plan.</p>
KKC162-20	Eastern Midland Regional Assembly (EMRA)	<p>1.EMRA request inclusion of the following to support regional policy objectives, contained in the EMRA's RSES and enhance cross boundary and inter-regional partnerships</p> <ul style="list-style-type: none"> • Protection of Kilkenny-Portlaoise former railway line and spur to Castlecomer • Recognition of the role of the River Barrow provides for recreational opportunities which supports RPOs 4.76 and 6.19. 	<p>1. Section 8.4 supports the development of Greenways & Blueways and currently references the potential of and opportunities for trails in the county, and for the development of linkages between existing trails and others in adjoining counties.</p> <p>River Barrow is currently referenced in Section 8.4.1.2 and the potential to enhance the tourism and recreation potential is recognised.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
			Recommendation: It is recommended that the following statement be included in Section 8.4 as follows: <i>"The Council will investigate the potential of developing a Greenway from Kilkenny to Castlecomer and Ballyragget and onwards to Portlaoise as part of the development of Greenways and Blueways within the County".</i>
KKC162-27	Transport Infrastructure Ireland (TII)	<p>1. TII notes the Core Strategy does not include text associated with improvement to the national road network. Such text would be beneficial.</p> <p>TII suggest the inclusion of the following objectives in Chapter 4 Core Strategy</p> <p>2.To maintain the strategic function, capacity and safety of the national roads network</p> <p>3.To ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.</p> <p>4.TII notes Objective 4I to review Ferrybank Belview LAP. TII would welcome consultation on the LAP process having regard to the significant national road interactions and the previous collaboration in developing an agreed access strategy for the N29, port access.</p> <p>5.TII recommends an update of Table in Section 12.11.2 to include M8 and M9</p>	<p>1. Improvements to the National Road network is dealt with in Section 12.11.2 of Draft Plan</p> <p>2. This remains an important priority for the plan, see Section 12.11 of Draft Plan.</p> <p>3. Ongoing maintenance is a priority for the council and is dealt with in the budget.</p> <p>4. TII will be consulted as a statutory body when compiling all local area or settlement plans.</p> <p>5.Recommendation: The Table in Section 12.11.2 will be updated to include the M8 and M9.</p> <p>6.This text is included in Section 12.11.3 of Draft Plan. And the footnote.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>6.TII request the inclusion of text reflecting Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines.</p> <p>7.TII is available to assist the Council in the development of proposals for consideration as 'exceptional circumstances' cases in accordance with the provisions of the DoECLG Guidelines.</p> <p>8.Access strategy agreements relating to the Glanbia plant on the N77 at Ballyragget were included in the County Development Plan, 2014, but do not appear in the Draft Plan; the Council may wish to review this.</p> <p>9. TII observes the potential for development management conflicts having regard to the extent of development in the Grannagh area accessing the N24, at a location outside a reduced urban speed limit. The current Draft Plan includes no policy response to this potential issue.</p> <p>10. Review the proposed development objectives relation to the N29 access strategy to ensure objectives in the Draft Plan are consistent with agreements already made for incorporation into the Ferrybank-Belview LAP</p> <p>11.TII would welcome a new policy objective in the Development Plan to include the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways reflecting policy outlined in the Retail Planning Guidelines, 2012.</p>	<p>7.Noted.</p> <p>8.Recommendation: The access strategy agreement for Glanbia should be reflected in Section 12.11.3</p> <ul style="list-style-type: none"> • Glanbia plant on the N77 at Ballyragget <p>9.The plan cannot provide for all potential development management conflicts. Development that could potentially impact the N24 will be referred to TII for comment.</p> <p>10.See objective 5J which deals with the N29. Detailed objectives regarding the N29 is contained in the Ferrybank/Belview LAP and will be considered in the Review of the LAP following the adoption of the City and County Plan.</p> <p>11. The Plan has a town centre first policy (see Objective 5U and Retail Policy 4 which has an explicit presumption against large out of town centres). Reference to compliance to the Retail Planning Guidelines is also included in the Plan.(See section 5.4.7)</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>12.TII would welcome consultation on the preparation of the Joint Retail Strategy with Waterford City and County Council for the Waterford MASP Area.</p> <p>13. TII requests the inclusion of an objective for the requirement to adhere to the provisions of official policy in relation to development accessing national roads as an advisory for development in rural areas</p> <p>14. TII requests that an appropriate cross reference with policies included in Section 12.11.10.1 relating to policy on access to national roads is included as a Policy Objective in Chapter 7 in the Development Plan prior to adoption.</p> <p>15. TII would welcome a new specific policy in Chapter 12 outlining the specific policy requirement to safeguard the strategic capacity of national road junctions in accordance with the provisions of official policy.</p> <p>16.TII recommends amendment of Objective 12Z to conform to the provisions official policy and safeguard national road schemes in planning.</p> <p>17.TII notes that the N77 Ballyraggett to Ballynaslee Scheme is incorrectly referenced as the N24 on Figure 12.1.</p>	<p>12.It is an objective of the Plan (5Z) to undertake a Joint Retail Strategy with neighbouring County Waterford. The widest possible consultation will be considered.</p> <p>13.Section 7.8.6 Rural House Design Guidance directs you to Section 12.11.3 Access to National Roads for further guidance.</p> <p>14.No requirement to cross reference as the Chapter 7 policies are all subject to Development Management Requirements in all other chapters as they apply.</p> <p>15.Recommendation: To include a wording in section 12.11.7 <i>"to safeguard the strategic capacity of national road junctions"</i>.</p> <p>16.Recommendation: Amend objective 12Z to read: <i>'To protect the study area, route corridor options and thereafter the preferred route corridor selected for the national road schemes being progressed in the Development Plan in accordance with National Development Plan Objectives and to prohibit development that could prejudice their future delivery'.</i></p> <p>17.Recommendation: Amend Reference to Ballyraggett to Ballynaslee Scheme to <i>N77</i> on Figure 12.1</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>18.TII would welcome the Council incorporating reference to TII Standard DNGEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads' in the Development Plan in association with reference to DMURS, in the interests of clarification.</p> <p>19.TII recommends that the Council should consider extending policies and objectives in the Draft Plan relating to Workplace Travel Plans/Mobility Management Planning to address existing and established trip intensive locations.</p> <p>20.TII recommend the inclusion of Section 2.8 of the DoECLG Guidelines which indicates the requirement of a forward planning approach to off line motorway service areas in formal policy in the Development Plan and as a reference guide in Development Management Standards</p> <p>21. TII request the inclusion of the following objective in Section 12.11.2</p> <p>The capacity and efficiency of the national road network drainage regimes in County Kilkenny will be safeguarded for national road drainage purposes'.</p> <p>22. TII request the inclusion of an objective for renewable energy and safeguarding the national road network. It should be demonstrated that an assessment of all alternative grid</p>	<p>18.Recommendation: It is recommended that TII Standard DNGEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads' be referenced in the Development Plan in Section 12.11.10.1 association with reference to DMURS.</p> <p>19.Recommendation: Amend Development Management Requirement in Section 12.5.2 as follows "To require Workplace Travel Plans for proposed trip intensive developments <i>in existing and established trip intensive locations</i> where onsite parking cannot be provided on site."</p> <p>20.Recommendation: That the following text be included in section 13.26. to <i>"As regards Service Stations, the Council will have regard to the provisions of Section 2.8 of the Spatial Planning and National Roads Guidelines 2012"</i></p> <p>21.Recommendation: Include following objective in Section 12.11.2 <i>'The capacity and efficiency of the national road network drainage regimes in County Kilkenny will be safeguarded for national road drainage purposes.'</i></p> <p>22.The alignment of grid connections should follow the most visually appropriate route and National routes will be considered as part of landscape impact assessment during route selection.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>connection routing options has been undertaken prior to any grid connection proposals being brought forward. Consider to including a similar statement in the County Wind Energy Strategy (Appendix K).</p> <p>23.TII requests references to the NRA DMRB are updated to TII Publications.</p> <p>24.TII request clarification of the policy in Section 13.11 to be extended to include reference to planned national roads as well as existing national roads.</p> <p>Volume 2 Kilkenny City</p> <p>25.TII request the inclusion of an objective in Section 5.8.4 outlining the specific policy requirement to safeguard the strategic capacity of the national road network and associated junctions.</p> <p>26.TII would welcome continued stakeholder consultation on the Kilkenny Local Transport Plan (LTP)</p> <p>27.TII considers objectives to improve cycle and pedestrian crossing facilities to connect across the ring road should be addressed in the active travel solutions developed as part of the LTP process and not be independent.</p> <p>28.TII is available to liaise with the Council in relation to the development of an appropriate plan led policy response to access the N10 roundabout at Blanchfields lands.</p>	<p>Undergrounding for instance along national routes is not be excluded as a possibility in the first instance.</p> <p>23.Recommendation: References to NRA DMRB will be updated to TII Publications in Section 12.3, 12.11.9. 12.11.10.1 and 13.22.1</p> <p>TD 41-42/09 will be updated to DN-GEO-03060</p> <p>24.Recommendation: Update text in Section 13.11 to include planned national roads.</p> <p>25.National guidance already referenced.</p> <p>26.Noted</p> <p>27.The LTP will include pedestrian and cycling plans which will include suggestions for dealing with crossing points on the ring road.</p> <p>28. Noted.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
KKC162-65	Department of Transport (DoT)	<p>The Department of Transport has requested the following policy developments be reflected in the 2021-2027 Plan:</p> <p>1.National Disability Inclusion Strategy (NDIS) 2017-2021 and the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).</p> <p>2.Local Authorities are a key stakeholder in ensuring a universal design approach to the built environment, including footpaths, roads, pedestrian crossing points and bus stops/shelters.</p>	<p>1.Recommendation: Include reference to the requested policies in Chapter 12 of the Plan.</p> <p>2.This is addressed in Section 12.10 of the Plan</p>
KK-C162-265	An Taisce	<p>1.An Taisce welcomes the significantly increased focus on climate issues and we welcome the Council's commitment to embed climate change adaptation and mitigation considerations in all policies and services.</p> <p>2.The growth projections of Food Wise 2025 (Section 7.2.1 of draft plan) are excessive and such expansion of the herd has adverse impacts on biodiversity on both land and surface waters due to increased use of pesticides, herbicides and fertilizers. These issues have not been sufficiently analysed in the Council's support for Agricultural policy in the Draft Plan.</p> <p>3.In the Natura Impact Report, Section 4, agricultural intensification is recognized as a threat to the River Nore and River Barrow SAC, but with limited measures available to the Council.</p> <p>4.An Taisce submits that agricultural development should only be supported in the Plan's policy objectives where it is demonstrably shown to not exacerbate deterioration in water</p>	<p>1.Noted</p> <p>2.Food Wise 2025 is National Policy and is referenced in the National Planning Framework, hence its interrogation is not a matter for the Development Plan, being a lower order plan than the NPF.</p> <p>3.As set out in Table 4.1, agricultural intensification is acknowledged as a threat to this SAC. The NIR states that no direct land take or habitat loss will occur due to the implementation of the Plan either within any European sites or any connectivity corridors necessary to support the ecological integrity of the site, due to Policy Objectives in Sections 1.3, 9.2.1.5, 9.2.2, 9.2.5.1, 9.2.7, 9.2.8 and 10.1.8.5. The regulation of agricultural activities is carried out under other environmental legislation, beyond the scope of this Plan.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>quality, to comply with the Habitats Directive and to not further increase GHG emissions with respect to EU and national climate change targets.</p> <p>5.In the Strategic Environment Assessment, the SEA objectives set out in Table 4.1 are admirable but with respect to biodiversity there is little protection for undesignated habitats and their wildlife. Intensive agriculture is the primary land use in County Kilkenny and is the leading driver of biodiversity loss. The monitoring proposals for environmental categories set out in Table 8.1 are weak, many are at such a low frequency that progress will be difficult to assess.</p> <p>6.Overall the Draft Plan does not sufficiently address the biodiversity loss emergency.</p> <p>7.The new Biodiversity Strategy and that most of the points in the EU Biodiversity Strategy for 2030 should be included as a specific biodiversity objective in the Draft Plan.</p> <p>8.Section 9.3.2.2. Kilkenny County Council should be more proactive in assisting people to upgrade protected structures by financing the reports.</p> <p>9.It appears that the Councils' powers under the Derelict Site Acts are not achieving successful remediation of sites such as Hebron House. An Taisce would encourage the Council to be more active in preserving the City's built heritage.</p>	<p>4.Agricultural runoff is being addressed through the Water Framework Directive and the River Basin Management Plans and agricultural management practices regulations. The Local Authority works with the relevant stakeholders to prevent the further deterioration of water quality and restore waterbodies to good status.</p> <p>5.Undesignated habitats and their wildlife are covered by SEO Ref. B1,B4 and B5. The monitoring proposals included in Section 8 of the Environmental Report are based on a series of indicators which measure changes in the environment. Existing monitoring arrangements are used where appropriate and possible, to ensure the data will be readily available to provide a comprehensive view of the impact of the Plan.</p> <p>6.The Plan subscribes to the protection and enhancement of Biodiversity. See Sections 9.2 and 9.2.2.</p> <p>7.The Kilkenny Biodiversity Strategy is included in the Kilkenny County Council Cultural Strategy and will be reviewed in 2022.</p> <p>8.Financial support is available for routine the maintenance of and restoration of protected structures and grants can be applied for under the Built Heritage Investment Scheme. Kilkenny County Council is already very proactive in these schemes.</p> <p>9.The Council has an active land management strategy which is borne out by the inclusion of Hebron House on its Vacant Sites</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		10.An Taisce questions objective 12G – as the plan will not achieve a modal shift from the private car to walking or cycling while increasing car parking spaces in the city centre. No further car parks should be provided in the centre, rather peripheral car parks at 10-minute walking distance from the city should be explored.	<p>Register, Site Ref. VSR21-2. The Vacant Sites Register and Derelict Structures are subject to the provision of statutory processes.</p> <p>10.The Council is committed to the achievement of the Modal Shift targets set out in the plan. A parking Strategy for the City will be included in the Kilkenny City Local Transport Plan, which will consider both the limitation of parking and the imperative to bring about a modal shift away from the private car.</p>
KCC162-173	Office of Public Works	<p>This submission relates to the Strategic Flood Risk Assessment (SFRA) included as part of the Strategic Environmental Assessment of the Draft Plan.</p> <p>1. The OPW welcomes the commitment to managing flooding, the need for SUDS, the management of flooding at design stage and recognition of the potential impacts of climate change on flood risk and the need to address these impacts.</p> <p>2. The sequential approach to planning in relation to flood risk management should be applied for settlements with no land use planning zones.</p>	<p>1. Noted.</p> <p>2.The SFRA sets out the broad principles governing the management of flood risk, following those outlined in the <i>Guidelines on the Planning System and Flood Risk Management</i>² and this includes application of the sequential approach to all development in areas of flood risk. Section 10.2.6.1 of the Plan sets out the overarching framework for flood risk management and this cites application of the Guidelines.</p>

² DECLG/OPW, *Guidelines on the Planning System and Flood Risk Management*, 2009

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>3. For rebuilding, or changes of use where the vulnerability classification changes, a significant additional number of people are introduced into flood risk areas or the storage of hazardous substances, the sequential approach and Justification Test should be applied.</p> <p>4. Consideration should be given to including policy objectives in relation to flood risk management in the Plan. Commitments have been made in the SFRA and in the Plan itself, that have not been transferred into set policy objectives.</p> <p>5. The development management requirements in relation to surface water and flood risk should be objectives.</p> <p>6. The OPW assert that provisos in relation to Highly Vulnerable and Vulnerable type developments in the Agriculture, Open Space/Biodiversity, Urban Agriculture and Strategic Reserve zones not been transferred into the Draft Plan.</p> <p>7. The OPW suggests that consideration might be given to specific policy objectives that have full regard to; the development and to the protection, and the need for maintenance, of flood relief schemes.</p> <p>8. The Council might consider including a register of key flood risk infrastructure in the Plan where it would not otherwise be readily identified or protected from interference or removal.</p>	<p>3. <i>Section 6.1.4.1 Minor Developments in the SFRA will be amended to ensure that the requirements in relation to rebuilding and infill include application of the sequential approach and Justification test.</i></p> <p>4. Section 10.2.6.1 of the Plan sets out the overarching framework for flood risk management; this is considered sufficient. <i>Section 10.2.6 Flooding of the Plan will be amended to ensure full coordination between the SFRA and Plan.</i></p> <p>5. <i>Including these as DM requirements is considered more appropriate than as objectives.</i> The objectives as set out in the Plan must be SMART – see Section 4.1 Structure of Plan.</p> <p>6. These zoning objectives are all applied in Kilkenny City, and the Zoning Objectives for Kilkenny City are set out in Section 2.9 of Volume 2, and each zone as referenced does include the proviso as outlined in the SFRA.</p> <p>7. The SFRA cites various Flood Relief schemes where relevant. <i>This will be amended to include an approach to development in areas where a flood relief scheme is planned.</i></p> <p>8. The Development Plan, as a 6 year strategic level document, is not the appropriate document for such a register.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>9. The OPW contend that the SFRA has not addressed how climate change has been considered in the production of the Plan, and that consideration might be given to policy objectives in relation to climate change and flood risk.</p> <p>10. Arterial Drainage Benefiting land maps are listed as a dataset for Kilkenny in the SFRA, however there are no OPW Arterial Drainage Schemes in the County.</p> <p>11. The OPW suggest that the recommendation to retain a green corridor on greenfield sites adjacent to watercourses should be included as a policy objective.</p> <p>12. The text under 6.5.1 Surface Water Drainage of the SFRA, which was to encourage the use of SuDS, was not completed.</p> <p>13. The SFRA references to www.floodmaps.ie should be amended to www.floodinfo.ie and some flood event records should be included in the SFRA.</p> <p>14. If groundwater is considered an issue then expertise should be sought from the Geological Survey of Ireland and the Environmental Protection Agency.</p> <p>15. A number of specific comments are included in relation to the flood mapping for a number of settlements.</p>	<p>9. Chapter 2 of the Plan sets out how the Plan addresses climate change, including in relation to flooding.</p> <p>10. <i>This reference will be amended to read "Land Commission Benefitting land maps"</i>. This dataset was obtained from the OPW in 2009, and is an additional source of information. All sources will be revisited as part of the changes to the SFRA, see Point 15 below.</p> <p>11. There is a requirement in the Development Management Requirements in Section 10.2.8 which seeks such a set back of 5 to 10 meters.</p> <p>12. <i>A comprehensive section on SUDS was devised and included in the Draft Plan; this was omitted from the SFRA. This will be included.</i> This will be included and amended as appropriate and relevant.</p> <p>13. Noted, <i>this will be amended and the events included.</i></p> <p>14. Noted.</p> <p>15. <i>These are noted and will be amended in the SFRA.</i></p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>16. Kilkenny City: It is stated as part of the flood risk assessment of some lands (Area 1, Area 3, Area 4, Area 5 and Area 6) in the SFRA, that "an objective will state that any development within Flood Zone A or B will be subject to a site specific Flood Risk Assessment". However, there are no Development Plan Objectives in relation to this.</p> <p>17. New Ross: It is stated as part of the flood risk assessment of the Industrial zoned land in the SFRA, that "<i>an objective will state that any development within Flood Zone A or B will be subject to a site specific Flood Risk Assessment</i>". However, there are no Development Plan Objectives in relation to this.</p>	<p>16. The policy in relation to Flooding is set out in Volume 1 rather than Vol. 2 which is primarily city-specific issues. Vol. 1, Section 10.2.6.2 Development management requirements of the Draft sets out that site specific FRAs are required for any area within or adjoining an area of flood risk. <i>This text will be amended to state "Any area within or adjoining Flood Zone A or B, or flood risk area, shall be the subject of a site specific FRA, appropriate to the type and scale of the development being proposed".</i></p> <p>17. As discussed under the point above, Vol. 1, Section 10.2.6.2 Development management requirements of the Draft sets out that site specific FRAs are required for any area within or adjoining an area of flood risk and this will be amended in line with the recommendation above. This will also be included in Section 13.30.4 Industrial.</p>
KKC162 - 209	Health Service Executive (HSE)	<p>1.The Plan has a large focus on Kilkenny City. The Council need to ensure this does not result in a disconnect between Kilkenny City and the rest of the county.</p> <p>Climate Change</p> <p>HSE recommend the following:</p> <p>2. Implement a range of climate mitigation measures aimed at reducing the overall carbon footprint of the county.</p> <p>3. Set out specific targets with regards to reducing greenhouse gas emissions, transport emissions and reducing energy demands in civic buildings throughout Kilkenny.</p>	<p>1.Noted.</p> <p>Points 2 – 6 This will be included in the Climate Action Plan</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>4.Actions that seek to combat, reduce or eliminate the emissions of greenhouse gases in County Kilkenny should be outlined.</p> <p>5.Key indicators for the monitoring of progress on climate action must be outlined to ensure progress is achieved.</p> <p>6.Identify infrastructure in the County which is vulnerable to climate change and implement proactive adaption measures to ensure its long-term resilience.</p> <p>7.There are historic flooding issues in relation to some regions in Kilkenny. An integrated approach to surface water management in the entire catchment area of these regions should be implemented.</p> <p>8.Aim to promote and increase the use of renewable energy within the County and identify and investigate the feasibility of certain towns and villages becoming sustainable energy communities.</p> <p>Sustainable Transport.</p> <p>9.Recommended to investigate how much traffic congestion is due to local traffic undertaking journeys of under 2k in large towns within the county. Pedestrian and cycle facilities should be provided in these instances that would facilitate a modal shift away from the car to walking or cycling.</p> <p>10.Common commuter routes within Kilkenny County should be identified. Public transport options and park and ride facilities should be provided to serve these routes.</p>	<p>7.A Strategic Flood Risk Assessment was carried out for the Draft Plan. This includes policies on surface water management.</p> <p>8.This is addressed in Chapter 11 Renewable Energy.</p> <p>9.This is dealt with in Objective 12G of the Plan.</p> <p>10.Noted</p> <p>11.The modal shift is a priority for the Council (Objective 12G). Pedestrian and cycling plans will be included in the upcoming Kilkenny Local Transport Plan (See Volume 2 section 5.3)</p> <p>12.Expansion of rural transport is under consideration by the NTA. Local Link Programme is referenced in Volume 1 Section 12.7.1.3</p> <p>13.This is an existing priority of Kilkenny County Council.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>11.Common commuter routes should be served with pedestrian and cycle lanes to give people alternative options of travel.</p> <p>12.Extend rural transport scheme or 'Local Link'</p> <p>13.Consider incentives to encourage the public to use more sustainable forms of travel such as advertising, travel passes etc.</p> <p>14.Invest in small-scale initiatives to improve the customer experience of public transport.</p> <p>15.Consider areas of Kilkenny to ban or reduce traffic flows, improving the quality and safety of the pedestrian environment.</p> <p>16.It is recommended that commercial sites, with suitable public transport facilities and are within walking/cycling distance to amenities should be assessed on a case by case basis with a view to limiting car parking spaces.</p> <p>17.Set a general restriction of the future development of out-of-town retail centers except in exceptional circumstances and implement parking charges.</p>	<p>14.Suggestions around these measures may come from the Kilkenny Local Transport Plan. These are already priorities for the council and the Local Bus service is up and running with various infrastructural improvements planned. Real time travel information may be a next step in the enhancement of local bus services, but will be an operational consideration.</p> <p>15.This will be considered as part of the overall mobility management strategy for Kilkenny City.</p> <p>16.The Draft plan already considers applications in these areas on a case by case basis and provides for maximum rather than minimum parking standards. The plan includes for a town centre first approach and already levies parking charges. See Volume 1 Section 12.12</p> <p>17.Section 5.4.6 Retail Objectives 5U supports town centre first approach and is also addressed in Policy 4 of Section 5.4.7 Retail Policies</p> <p>18.School travel plans are addressed in Volume 1 Section 12.3 and Section 12.5.2. It is a development management requirement to provide work place travel plans. Large developments with high travel demands are required to produce work place travel plans. Schools are included in this scenario.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>18.Set a target that every school in Kilkenny has a school travel plan to encourage students to take alternatives to the car. This should be supported with a strategic aim</p> <p>19.Consider the provision of facilities such as secure bike parking and changing/showering facilities at places of employment.</p> <p>Physical Activity</p> <p>20.It is recommended the progress on achieving targets set out in Table 12.1 is monitored throughout the lifetime of the Plan.</p> <p>21.It is recommended that a list of specific cycling and pedestrian infrastructure projects for all towns and villages in Kilkenny are identified.</p> <p>22.It is recommended the Council allocates a specific portion of its transport budget to ensure that a percentage of identified pedestrian and cycle infrastructure schemes are implemented on a yearly basis.</p> <p>23.Recommended Kilkenny County Council implement measures which promote physical activity in the built environment of the county</p> <p>Green Infrastructure</p> <p>24.HSE suggest that Kilkenny County Council should consider an objective for green infrastructure strategy.</p> <p>Town Regeneration:</p>	<p>19.These considerations will form part of the Council's cycle scheme.</p> <p>20.Noted.</p> <p>21.A pedestrian and cycle plan forms part of the Kilkenny Local Transport plan for the city. Mobility plans are or have been prepared for the District towns along with Piltown. Further mobility plans will be delivered as resources permit under Smarter Travel.</p> <p>22.Some of these projects are referenced in Local Area Plans and others, including priorities, will be included Kilkenny City Local Transport plan. Although priorities may be influenced by the plan, the County Budget is a reserved function separate to the Development plan.</p> <p>23.Volume 1 Section 6.16 considers Health and Well-Being. The issues raised are all priorities for the plan and are addressed throughout.</p> <p>24. As part of the Plan there are policies for Biodiversity recreational open spaces which will encourage greening of the County.</p>

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		<p>25.Measures to tackle vacant units, the zoning of retail areas and housing on the main streets of towns and villages should all be reassessed in the draft development plan.</p> <p>26.The Council should cater for the increased number of people working locally due to Covid and encourage local working.</p> <p>Food</p> <p>27.The HSE suggests a number of ways how KCC can influence and regulate the built environment to improve health and reduce the extent to which it promotes obesity.</p> <p>Social Inclusion:</p> <p>28.KCC should implement practical measures to proactively address health inequalities in Kilkenny</p> <p>29. Plans and development for Nursing Homes or Residential Care Facilities should include proposals for gardens and recreational activities.</p> <p>30. KCC should implement other age-related initiatives such as 'Dementia Friendly Communities'.</p> <p>31. A local re-housing plan should be prepared and jointly co-ordinated with the HSE, in collaboration with service providers.</p>	<p>25.The Council supports Active Land Management (Volume 1, Section 4.2.1 and objectives 4A-4D) and is proactive in the application of Vacant Site Levy (Volume 1, Section 6.6) and Derelict Sites. Measures have to be applied in due regard, depending on ownership etc.</p> <p>26.The plan does not militate against local working and applications for Hubs will be given positive consideration in the right locations.</p> <p>27.Many of the actions mentioned are already part of the Council's activities such as supporting community based activity, promoting healthy lifestyle through placemaking.</p> <p>28. The Draft Plan is based around the 10 National Strategic Outcomes which in combination provide for access to all services in a sustainable manner thereby reducing inequalities.</p> <p>29. Applications for such facilities are considered on a case by case basis and the issues raised are fully considered.</p> <p>30.Age related initiatives are included through the Age Friendly policies in the Plan (Section 6.17).</p>

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		<p>32. KCC should identify suitable sites and provide specific funding to develop multifunctional community spaces or 'youth cafes' which should aim to provide sports, music and drama activities.</p> <p>Waste:</p> <p>33. KCC to consider implementing waste measures within the county, including waste prevention measures, accessibility to recycling bins, food waste reduction incentives and educational campaigns.</p> <p>Noise</p> <p>34. It is recommended that a noise impact assessment is carried out for any development proposals in Kilkenny with the potential to give rise to significant noise impacts.</p> <p>35. Environmental noise from roads, railways, commercial and industrial premises should be considered where planning new houses, schools etc.</p> <p>36. Existing quiet areas in the county should be mapped and identified.</p> <p>Air pollution</p> <p>37. KCC should develop local air quality monitoring plans and work with national programmes in air quality monitoring.</p> <p>Implementation and Evaluation</p> <p>38. The council should develop and publish specific measures or performance indicators which establish how progress is quantified and measured.</p>	<p>31. A housing strategy and housing demand assessment is prepared as part of the Plan making process.</p> <p>32. Community spaces are delivered by the Council through the various funding streams available and the Development Plan is set up to provide these spaces at locations identified in consultation with stakeholders.</p> <p>33. This is an operational issue and this type of work is carried out on an ongoing basis.</p> <p>34. This is part of the assessment of the potential impacts of any relevant development applications.</p> <p>35. This is part of the assessment of any relevant development applications.</p> <p>36. Quiet areas are referenced in Section 10.2.2 which is considered sufficient.</p> <p>37. The Council work with national programmes of air quality monitoring.</p> <p>38. The Environmental Report includes a table of monitoring indicators. There is a requirement for the Council to assess the implementation of the Plan after two years. In addition, the Plan contains an objective to monitor delivery of the Plan through</p>

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			housing completions, environmental performance, modal shift etc.
KK-C162-236	Development Applications Unit (DAU)	<p>Archaeological and Built Heritage</p> <p>1.The Department provides general policy and specific objectives recommendations for the Council to apply to archaeological heritage</p> <p>2. The Department provides policy recommendations with regard to the promotion of the County's archaeological heritage</p> <p>3. It is recommended to include additional policy and development control objectives and policies where a proposed development (excluding individual residential home units) includes a monument or site included in the RMP within the landholding.</p> <p>4. Any works in, or around, or in the vicinity of sites of archaeological importance, and/or monuments subject to a Preservation Order, may require Ministerial Consent (irrespective of Planning Permission) under Section 14 of the National Monuments Act 1930 as amended by Section 5 of the National Monuments (Amendment) Act 2004.</p> <p>Underwater Archaeological Heritage</p> <p>5. Include a policy to allow for the protection of riverine, lacustrine, intertidal and sub-tidal historic environments.</p> <p>Climate Change Policy and Objectives</p>	<p>1.Volume 1 Section 9.3.1 adequately addresses archaeological heritage.</p> <p>2. This is an existing priority of the Heritage Section of Kilkenny County Council.</p> <p>3. Section 9.3 sets out development management requirements for development in the vicinity of recorded monuments.</p> <p>4. Noted.</p> <p>5. Policy for underwater archaeology is addressed in Section 9.3.1.2.</p>

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		<p>6. The planning authority to ensure the recommended climate change policies and objectives for Archaeological Heritage are included in the Development Plan.</p> <p>Architectural Heritage</p> <p>7. Climate Change -The mention of built heritage as part of the climate change mitigation has not been adequately signalled, particularly in the context of the Green Deal funding programme</p> <p>8. Core Strategy/Economic Development – Mention of built heritage as part of the town centre renewal framework has not been made.</p> <p>9. The connection between ACA policies and city/town centre revitalisation has not been adequately made.</p> <p>10. The inclusion of policy re. ACA's and archaeology should be considered as part of Table 4.3.</p> <p>11. Support and implementation of key funding streams or town programmes such as Irish Walled Towns Network, Historic Towns Initiative and CTHCP is recommended with objectives for community engagement in place making</p> <p>12. Core Strategy/Promoting Compact Growth – The protection of built heritage character, reuse of urban buildings and their historical context with appropriate infill to their character and scale has not been adequately addressed as part of the future revitalisation of Kilkenny city.</p>	<p>6. The recommended climate change policies and objectives are included in Section 9.3 of the Plan.</p> <p>7. Recommendation: A reference to the role of built heritage, such as the reuse of existing fabric, will be included in Section 2.4 Integration of Climate Change into the CDP.</p> <p>8. Is it considered that built heritage forms part of the character of the area and contributes to the sense of place. Its an objective of the Plan to achieve National Strategic Outcomes one of which is enhanced Amenity and Heritage.</p> <p>9. Section 9.3.3 sets out adequate ACA development management guidance.</p> <p>10. Table 4.3 relates to settlement hierarchy it is not appropriate to refer to ACA's as they are contained within each settlement category. ACA are dealt with comprehensively in the Heritage Chapter.</p> <p>11. Noted.</p> <p>12. This is adequately addressed in Volume 2, Section 3.4.5 and Section 4.4.</p>

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		<p>(such as restoration of wetlands and woodlands), that can benefit the Water Framework Directive, flood risk management and biodiversity objectives.</p> <p>Chapter 8</p> <p>18. It is requested for the cumulative impacts of the recreation objectives in Chapter 8 and Volume 2 are further assessed in the NIR and SEA.</p> <p>19. It is recommended to include an objective to carry out a comprehensive otter and kingfisher survey of the River Nore and its designated tributaries to inform recreation planning in addition to the habitat and green infrastructure surveys.</p> <p>20. The Department is concerned the planned water sports hub will lead to the potential spread of crayfish plague to the SAC, through movement of watercraft from one catchment to another has not been assessed in the NIR.</p> <p>Chapter 9</p> <p>21. Request for objectives and Development Management Requirements to be more detailed and specific to ensure they will successfully mitigate the impacts of development</p> <p>22.The Department recommends this chapter to include a 'no net loss of biodiversity' objective in accordance with the National Biodiversity Plan</p> <p>23. Inclusion of reference to riparian buffer zones in urban areas with reference to guidance by Inland Fisheries Ireland on planning for watercourses in the urban environment. Key</p>	<p>16. Ecosystem services are addressed in Section 9.2.3 of Volume 1.</p> <p>17. Recommendation: These examples will be included.</p> <p>18. Noted. The AA NIR and ER will be updated to address the cumulative impacts of recreational developments in greater detail.</p> <p>19.As opportunities arise, surveys could be carried out, but the Local Authority is not responsible for the management of the River Nore SAC or SPA.</p> <p>20. This is a control issue that will have to be addressed should a proposal for a water sports hub evolve.</p> <p>21.No details are specified. It is considered current wording is adequate in the absence of detail.</p> <p>22. The strategic aim of the Plan (Chapter 8) is to protect and enhance biodiversity.</p> <p>23. The water courses have a general protection under ground and surface water protection. Additionally, in the case of proposed developments, development management standards provide protection. (See KCC162- 173 OPW item 11).</p>

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		<p>development management requirements could be included as "objectives".</p> <p>24. Include reference in Section 9.2.1.5 to current Flora (Protection) Order 2015 (S.I. No. 356 of 2015)</p> <p>25. Section 9.2.5 Woodlands, Trees and Hedgerows reference to 1946 Forestry Act to be replaced by the Forestry Act 2014</p> <p>26. Section 9.2.5.1 Hedgerows reference to nesting period to be replaced with 1st March – 31st August.</p> <p>Chapter 10</p> <p>27. Section 10.1.4 Water Supply and Treatment - The stated policy for allowing private water supplies within the Plan area and whether these impacts will affect the hydrological regime of water dependent Natura 2000 sites needs to be addressed as part of the NIR and SEA of the Plan.</p> <p>28. The Department recommends the inclusion of a Light Pollution Policy in Section 10.2.4 Light Pollution</p> <p>29. A move away from underground attenuation tanks as the 'go to' SUDS measure is encouraged and instead encourage use of natural resources. For larger scale developments the Department recommends the inclusion of a report of the SUDS</p>	<p>Recommendation: Reference 'Planning for Watercourses in the Urban Environment' in the Plan.</p> <p>24. Recommendation: Amend text in Section 9.2.1.5 as follows - These includes plant species listed in the Flora Protection Order, 1999 <i>Flora (Protection) Order 2015 (S.I. No. 356 of 2015)</i> (or other such Orders)</p> <p>25. Recommendation: Amend text in Section 9.2.5 as follows - Under the 1946 Forestry Act <i>Forestry Act 2014</i></p> <p>26. Recommendation: Amend text in Section 9.2.5.1 as follows - prohibiting the cutting of hedges within the bird nesting period (1st March -1st September <i>31st August</i>).</p> <p>27. Recommendation: An update to the Plan text in Section 10.1.4 "Water Supply and Treatment" is recommended as follows: <i>The provision of such temporary facilities shall only be considered where the solution is environmentally sustainable and would not affect the quality status of water sources. Proposals for such facilities must clearly demonstrate they would not singularly or cumulatively adversely effect the ecological integrity of any European Site. Adequate provision shall be made by the developer for the operation and maintenance of the proposed temporary</i></p>

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		<p>measures considered in principle and reasons and why natural measures were not considered.</p> <p>30. Section 10.2.8 Development Management requirement states "Where streams open drains or other watercourses are being culverted – the minimum permissible culvert diameter is 900mm." A clear objective discouraging culverting of water courses is requested. Where culverting is unavoidable the use of ecologically friendly box culverts is advised. A development proposal requiring culverting should document open watercourse habitat lost and provide compensatory habitat.</p> <p>31. The Department recommends the suggestion in the SFRA that a 'green corridor' is retained on all rivers and streams is a proactive objective and could be included in this chapter.</p>	<p><i>facility for the duration of its required existence and thereafter for its decommissioning and removal from site.</i></p> <p><i>The Council will work with Irish Water to protect existing water and wastewater infrastructure in the City and County and facilitate the development of new infrastructure aligned with the Core strategies.</i></p> <p><i>Where public watermains are available or likely to be available and have sufficient capacity, the Council will require that new development proposals connect into the existing public water mains.</i></p> <p>This amended text will be assessed in the environmental assessments of any material alterations.</p> <p>28. Light pollution is currently adequately assessed by the Environment Department of the Council</p> <p>29. SUDS is the first choice for surface water disposal unless impractical. A revised section on SUDS will be included as part of the SFRA, see KK-C162-173.</p> <p>30. Recommendation: Update development management requirement in relation to culverting as requested in Section 10.2.8.</p> <p>31. Recommendation: Include reference to the importance of riparian zones in Section 9.2.6 Inland Waters (See submission D66)</p>

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		<p>Chapter 11</p> <p>32. Section 11.5.3.6 Natural Heritage – The Department has requested the removal of the reference to registered thoroughbred stud farms. This section should provide further details on potential conflicts which arise between wind energy developments and natural heritage.</p> <p>33. Table 11.4 – Include ecological impacts of nitrogen deposition in this table. Impacts of nitrogen deposition include acidification and eutrophication resulting in biodiversity loss.</p> <p>34. The Department advises the AA should include an assessment of the impacts of nitrogen deposition on Natura 2000 sites within the Plan's zone of influence.</p> <p>35. Consideration should also be given to monitoring nitrogen deposition in the SEA.</p> <p>Volume 2 – Kilkenny City</p> <p>36. Development of land in Loughmacask must be preceded by provision of adequate waste water infrastructure so that no negative impacts to the River Barrow and River Nore SAC and River Nore SPA occur.</p>	<p>32. Recommendation: This reference to registered thoroughbred stud farms will be removed from this section, and a new section will be included in Chapter 11 entitled "Effects on Equine Facilities". The Natural Heritage section will refer to the appropriate section of the Wind Energy Development Guidelines in relation to the conflicts between natural heritage and wind energy developments.</p> <p>33. Recommendation: Update Table 11.4 to include ecological impacts of nitrogen deposition.</p> <p>34. The AA NIR will be updated to include an assessment of the impacts of nitrogen deposition on Natura 2000 sites within the Plan's zone of influence.</p> <p>35. The monitoring of Nitrogen deposition is not a statutory function of the Local Authority and is more appropriately addressed at a national level to ensure consistency.</p> <p>36. Kilkenny County Council are working alongside Irish Water to ensure all lands identified for development are or will be serviced in the lifetime of this Plan.</p>
KK-C162-247	Eirgrid	<p>1. Regional Policy Objectives 219-224 of the RSES should be included where applicable in the forthcoming Plan</p> <p>2. Eirgrid suggests a section is included setting out how various Government policy documents have been considered in a holistic and integrated way to inform subsequent plan policy.</p>	<p>1. Noted.</p> <p>2. This is completed in Section 1.6 of the Plan.</p> <p>3. The document is referenced in Section 11.5 of the Plan</p>

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		<p>3.The Department of Communications, Energy and Natural Resources (2015) White Paper on Energy – <i>Ireland's Transition to a Low Carbon Energy Future 2015-2030</i> should be relied upon as a source of policy formulation for energy in the draft plan.</p> <p>4.The Plan must reflect EirGrids need for robust policies to develop the electricity grid in a safe and secure way. This is necessary to meet projected demand levels; Government policy; and ensure a long-term, sustainable and competitive energy future for Ireland.</p> <p>5.The Draft Plan should facilitate the development of grid reinforcements including grid connections and a transboundary network into and through the County and between all adjacent counties and to support the development of international connection.</p> <p>6.There is a risk to the security of supply in the South-eastern area of the country caused by heavy power flows through the network. The network between Munster and Leinster needs to be strengthened.</p> <p>7.The development of the transmission grid outlined in detail in <i>EirGrids Grid Development Strategy – Your Grid, Your Tomorrow</i> (2017) and associated Technical Report (2017) (ENCL2) is of critical importance to support the environment, economy and society</p> <p>8.EirGrid requires appropriate and robust policies and objectives for planning the national grid infrastructure and prioritising it</p>	<p>4.Noted.</p> <p>5.This is set out in Section 10.3.1 and Section 10.3.2 of the Plan</p> <p>6.Policy for enhanced electricity networks and new transmission infrastructure projects is set out in Section 10.3.1, Volume 1 of the Plan</p> <p>7.Noted.</p> <p>8.Noted.</p>

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		<p>appropriately in order to deliver national, regional and local benefit.</p> <p>9.EirGrid requests that the importance of the grid is acknowledged as a strategic issue.</p>	<p>9.Section 3.9 of the Plan sets out the Strategic Issues of the Plan; an increase in renewable energy production is part of one of the strategic issues.</p>
KK-C162-302	Gas Networks Ireland (GNI)	<p>Chapter 2 Climate Change</p> <p>1.GNI request the inclusion of additional text in Section 2.3</p> <p>2.GNI request the inclusion of additional text in Section 2.4.2</p> <p>Chapter 11 Renewable Energy</p> <p>3.GNI requests the amendment of text in Section 11.6.1</p> <p>4.GNI would welcome the inclusion of support for the sustainable development of AD plants and for investment in infrastructure to inject renewable gas into the gas network and bring it to a broad spectrum of customers.</p> <p>Chapter 12 Movement and Mobility</p>	<p>1. & 2</p> <p>Recommendation: Include following text in Section 2.4.2 <i>"Facilitate the rollout of CNG vehicles by supporting the development of CNG refuelling infrastructure"</i></p> <p>3.Recommendation: Amend text as follows: Anaerobic digestion involves the bacterial transformation of biomass (for example animal manure) <i>to produce biogas which can be</i> upgraded to Biomethane or biogas Biogas <i>Biomethane</i> can also be compressed and used as a transport fuel</p> <p>4.Policy to support AD plants in Kilkenny County is set out in Section 11.6.7, Volume 1.</p> <p>5.Support for RPO 93a is set out in Section 5.3.1 and 12.8.1 which notes Belview Port is classified as a comprehensive port on EU's TEN-T network and sets out policy to supports its development</p>

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		<p>5.GNI would welcome the inclusion of support for the development of CNG infrastructure in line with RPO 93a and RPO 225d of the RSES</p> <p>6.GNI suggests an additional section is added to Chapter 12 to provide details about CNG in transport.</p>	<p>Support for RPO 225d is set out in Section 11.6.10</p> <p>6.The support for the rollout of CNG vehicles and refuelling infrastructure is considered sufficient.</p>
KK-C162-319	ESB	<p>1.The submission sets out the ESBs position in terms of generation, transmission and distribution, the ESB's rollout of EV Infrastructure, Telecoms & Telecommunications Infrastructure.</p> <p>2.ESB supports a new CCDP which will include policies and objectives to support the delivery of energy infrastructure objectives 11A which supports and facilitate the provision of energy in accordance with Ireland's Transition to a Low Carbon Energy Future.</p> <p>3.There is an opportunity to strengthen the plan with the inclusion of Development Management Guidance to support the life-extension and repowering of existing wind farms. Table 11.3 – Wind Energy Strategy Areas, Policy Areas should include 'Wind Farm Life Extensions' and 'Windfarm Repowering' permissible in 'Open for Consideration' and 'Acceptable in Principle' areas.</p> <p>4.The Solar Energy Development Management Guidance set out in section 11.8.5 of the Draft Plan could be strengthened with the inclusion of clear guidance on the duration of permission.</p>	<p>1.Noted.</p> <p>2.Noted.</p> <p>3.Wind Farm Repowering is not excluded by virtue of the current designations. The revised designations are generally consistent with the locations of existing wind farms and therefore the plan does not militate against repowering. The proposed designations are not included for in the Wind Energy Guidance issued by the Minister and hence are not included in the current plan.</p>

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		<p>The Planning Authority should retain the option to grant permission for a longer period if requested by the developer in appropriate circumstances, with the lifetime of the solar farms up to 40 years.</p> <p>5. On dull still days or nights, it will be necessary to connect additional non-renewable plant to the grid such as gas turbine to provide backup power. FlexGen gas turbines need to be located within 500m of an existing 110kV or 220kV station and within 5km of the gas grid and hence it is recommended that a "Renewables-Enabling Map" suggest preferred locations for FlexGen gas turbine plant and synchronous condensers in the Wind Energy Development Strategy.</p> <p>6. In addition to the support included in section 11.11, the ESB would welcome the inclusion of specific policies supporting these new technologies such as battery storage, liquid air storage and synchronous condensers. Large scale Green Hydrogen production and storage could leverage the continental scale of Ireland's renewable energy potential.</p> <p>7. ESB encourages policies consistent with the Department Circular to allow for the improved development of</p>	<p>4. The statutory appropriate period for executing a permission is five years and can be extended. Applicants can however request an extended appropriate period and ten-year appropriate periods for permissions are currently not uncommon. It is not in the interest of proper planning to have developers leave a windfarm undeveloped for too long as permissions already granted are considered in terms of cumulative impact in any subsequent application. The operational period is a separate consideration and will be considered as part of the application. Long operation periods of 20 to 30 years are not uncommon.</p> <p>5. The Wind Energy Strategy is not intended to cater for gas turbine plants. Such proposals will be considered on their own merits, in line with the development management requirements set out in Chapter 11 Renewable Energy.</p>

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		<p>telecommunications infrastructure, particularly broadband capability in the area.</p> <p>8.EU Energy Performance of Buildings Directive comes into force soon and calls for an increase to 20% for the number of parking spaces which should have provision for electric vehicle charging infrastructure.</p> <p>9.Kilkenny County Council should strengthen their support for the roll-out of EV infrastructure with the inclusion updated parking standards in the Development Management Standards of the new plan:</p> <p>10.For Developments with Private Car Spaces (residential and non-residential) including visitor car parking spaces e.g. office – spaces, at least one parking space should be equipped with one fully functional EV charging point and it should be possible to expand the charging system at a future date (e.g. by installing appropriate ducting now) so that up to 20% of all spaces can be fitted with a similar charging point.</p> <p>11.For Developments with Publicly Accessible Spaces (e.g. supermarket car park, cinema etc.) At least one parking space should be equipped with one fully functional EV charging point, it should be possible to expand the charging system at a future date so that up to 20% of all spaces can be fitted with a similar</p>	<p>6.Recommendation: That a statement be included to support new technologies such as battery storage, liquid air storage and synchronous condensers.</p> <p>7.Section 10.4 deals with Telecommunications Infrastructure and broadband. Objective 10I already supports the delivery of high capacity Information Communications Technology infrastructure, including broadband.</p> <p>8.Section 12.4 deals with Electric Vehicles and currently requires 10% of car parking spaces in new residential developments to provide for Electric Vehicles.</p> <p>10.Recommendation: Review Development Management Requirements for electric vehicles under Section 12.14 and include a requirement that <i>"For Developments with Private Car Spaces (residential and non-residential) including visitor car parking spaces e.g. office –spaces,</i></p>

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		charging point, Charge Point Parking space(s) should be clearly marked with appropriate signage should be capable of communicating usage data with the national charge point management system	<p><i>at least one parking space should be equipped with one fully functional EV charging point and it should be possible to expand the charging system at a future date (e.g. by installing appropriate ducting now) so that up to 20% of all spaces can be fitted with a similar charging points.</i></p> <p><i>11.Developments with Publicly Accessible Spaces (e.g. supermarket car park, cinema etc.) should have at least one parking space equipped with one fully functional EV charging point and it should be possible to expand the charging system at a future date so that up to 20% of all spaces can be fitted with a similar charging point. Charge Point Parking space(s) should be clearly marked with appropriate signage should be capable of communicating usage data with the national charge point management system</i></p>
KK-C162-330	Irish Water	<p>1. Irish Water requires to note Section 8.1 of the RSES which provides general policy direction in relation to the sustainable management of water supply and wastewater needs.</p> <p>2. Irish Water will work with the local authority to ensure the overarching goals of mitigating against, and adapting to, climate change in relation to water and wastewater are achieved.</p> <p>3. Irish Water is committed to working with public bodies and other stakeholders towards a common goal of the protection of drinking water sources.</p> <p>Irish Water suggest the inclusion of the following objectives:</p>	<p>1. Section 8.1 of the RSES relates to employment and Enterprise.</p> <p>2. Noted.</p> <p>3. Noted.</p> <p>4. This is addressed in Section 10.1.8 of the Plan</p>

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		<p>4.To protect both ground and surface water sources, to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Article 7(2) of the WFD. Protection and restoration of drinking water at the source can have co-benefits for biodiversity and climate change.</p> <p>5.To support Irish Water in the development and implementation of Drinking Water Safety Plans which seek to protect human health by identifying, assessing and managing risks to water quality and quantity; taking a holistic approach from source to tap.</p> <p>6.Irish Water will respond in due course to the inclusion of policy in relation to the provision of wells on a temporary basis to service developments in the short term where water capacity is constrained.</p> <p>7.Irish Water and KCC will continue to monitor the performance of the water and wastewater networks to ensure that the most urgent works are prioritised as required.</p> <p>8.Irish Water will keep Kilkenny County Council updated on the progress with the DAP as the development plan process progresses.</p> <p>9. Appendix B – Housing Strategy – KCC to note capacity figures set out in Table 1 and Table 3 are based on the best available information at the date of the issue and are subject to change</p>	<p>5.This is addressed in Section 10.1.8.3.1.</p> <p>6.Noticed and in the interim the Council will continue with its policy to allow development with private water supply where there is deficiencies in the public water supply.</p> <p>7.Noticed.</p> <p>8.Noticed.</p> <p>9. Recommendation: To be included as a footnote to Table 1 and Table 3 of the Housing Strategy</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>10. Reference to Inistioge in Table 3 (Note 8) - Irish Water informs that no projects have been confirmed yet for the next capital investment plan (post 2024)</p> <p>11. Irish Water provided a suite of policies/ objective they would like to be included in the Development Plan in relation to protecting Irish Water assets and the environment for the benefit of current and future population served by public water services networks.</p>	<p>10. Recommendation: This will be changed accordingly.</p> <p>11. Recommendation: These policies will be attached as an appendix to the Plan.</p>
KK-C162-355	Southern Region Waste Management Planning Office	<p>1.The submission highlights the circular economy, its benefits, opportunities around and the strong link between a low carbon economy and the circular economy.</p> <p>2.The principles of the Circular Economy will form a fundamental part of the upcoming National Waste Management Plan for a Circular Economy, for which pre-draft consultation has now commenced.</p>	1.Noted. The Plan supports the implementation of the Southern Regional Waste Management Plan, which supports the promotion of resource efficiency and the circular economy.
KK-C162-404	Southern Regional Assembly	<p>1.Requests that environmental assessments/designations for SEA, SFRA, EIA and EclA are also covered by an overarching plan objective.</p> <p>2.Reframe the introduction to show the interrelationship between the NPF, the RSES and Development Plans.</p> <p>3.Highlight in Chapter 2 the target of 100% Renewable energy by 2030 and include specific policy objectives to address other sectors in the County Development Plan.</p>	<p>1.SEA, SFRA and EclA are all covered by another statutes and may not be applicable in all cases.</p> <p>2.Insert flow diagram for NPF RSES and Development Plan and include Section B & C under 1.6.5 of the Plan as requested.</p> <p>3.Highlighting target again is not considered necessary. Duplication of text.</p> <p>4.The Council has been ambitious in its renewable energy target and the Climate Action Bill is currently progressing which will set</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>4.Suggested that the Council should examine the specific policy approach and objectives (and targets) that can be applied in the Plan to contribute towards the achievement of the Climate Action Plan</p> <p>5.The Draft Pan should be strengthened by additional content (or chapter) to set out how the vision for the Waterford MASP will be implemented in areas within Co. Kilkenny. It is considered that this should include a shared section developed with Waterford City and County Council and the SRA relating to the MASP and which could be included in both Development Plans.</p> <p>6.RPO 11 states that the appropriate level of growth is to be determined by the Core Strategy of Development Plans. Local Authorities are supported by RPO 11 in targeting growth of more than 30% for each key town subject to capacity analysis and sustainable criteria set out in the RSES at Section 3.3 The Housing Strategy, Environmental Report, Infrastructure Capacity and Draft Development Plan Objectives for Climate Change and Compact Growth, present a valuable evidence base on which the Core Strategy approach to population distribution should be developed. In this regard the NPF National Policy Objective 36 stresses the importance of a consistent and robust evidence bases for housing policy formulation and it is recommended that the approach to population distribution in the Core Strategy is review having regard to the evidence base. The Council is requested to</p>	<p>statutory limits in this area. It is considered premature to insert additional targets at this stage.</p> <p>5.Additional content will be inserted in connection with vision for Waterford MASP.</p> <p>6.The population allocations have been reviewed in the context of the Section 28 Guidelines issued by the Department of Housing Planning & Local Government on the 23rd Dec 2020. This has resulted in a greater allocation of populations to Kilkenny City & Waterford MASP areas. (see also Submission 418)</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>review the Core Strategy population allocations to address the concerns above and review population allocations having regard to the evidence base, stated policy on climate change and compact growth and NPF and RSES policy RSES RPO 3</p> <p>7.Additional policy objectives could be included to provide for a stronger and more time-bound focus on the identification of and regeneration of Brownfield sites across the county.</p> <p>8.It is recommended that the Council should review the options for providing additional population allocations to District Towns and smaller towns and villages to support urban renewal and the future viability of services and regeneration of these settlements.</p> <p>9.In relation to the population distribution provided in Table 4.7, which is a critical element in the application of the Development Objectives such 4B (Growth in Compact Form), the Assessment of impact on SEA Objectives is not assessed.</p> <p>10.In order to ensure effective implementation of the Housing Needs Demand Assessment and to support monitoring of housing and population trends it is recommended that the final Core Strategy should include projected housing unit numbers required for all settlement levels and housing in the open countryside.</p> <p>11.The main emphasis of the RSES Economic Strategy and Local Authority Economic Strategy should be to create the conditions that will support and encourage enterprise development and employment creation. It is recommended that the Economic</p>	<p>7.Through work carried out for both Vacant Sites and Derelict sites it is sufficient resources are given without the necessity for additional policy objectives.</p> <p>8.Additional population allocations have been given to the District towns over and above their LAP allocations. Allocations to other settlements in the hierarchy is based on the provision of adequate social and physical infrastructure and will be assessed on a case by case basis.</p> <p>9. Chapter 6 of the Environmental Report (ER) provides an assessment of the Likely Significant Effects on the Environment, addressing every Strategic Aim and Development Objective in the Plan. The population distribution as set out in Table 4.7 will be applied through the implementation of the 13 detailed objectives included in Table 4.7, which have all been assessed under the SEA. The ER will be amended to include for all proposed changes to the Plan and its objectives as detailed in this Report. This will include a more detailed consideration of the Preferred Plan Scenario and the proposed population distribution in Table 4.7.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>Strategy in Chapter 5 be reviewed to incorporate the 5 principles of the Region's Economic Strategy as set out in chapter 5 of the RSES.</p> <p>12.It is recommended that the Economic Development Strategy could be strengthened by the inclusion of an objective to support the development of a Learning Region, along with the Regional Assembly and other stakeholders such as the Kilkenny and Carlow ETB and the Waterford and Wexford ETB.</p> <p>13.The ETBs provide an important role in supporting Kilkenny's business ecosystem, by mitigating against the economic impact of COVID-19 through their upskilling and reskilling courses. Therefore, the role of the ETBs should be considered for inclusion in chapter 6.</p> <p>14.Renewable Energy –the sector is not identified in the economic sectors listed in Chapter 5. The transition to a Low Carbon Economy provides significant economic potential for the County and can also attract funding through –for example –the Climate Action Competitive Fund. Therefore, the council should consider the inclusion of additional policy content to address opportunities that exist from the transition to a Low Carbon Economy. RPO 56 –Low Carbon Economy addresses this issue in the RSES</p> <p>15.While Section 5.3 acknowledges the Waterford Metropolitan Area, it is considered that the wider Metropolitan Area within Co. Kilkenny would constitute a third Strategic Location of Enterprise</p>	<p>10.The revised core strategy includes for housing allocations to all settlement categories in the hierarchy.</p> <p>11.Insert a new Section 5.1.1.1 to specifically reference the RSES 5 principles on economic development of Knowledge Diffusion, Smart Specialisation, Clustering, Capacity building, and Placemaking,</p> <p>12.Include a statement in Chapter 5 on the learning region and lifelong learning.</p> <p>13.Insert reference in 6.13.3 to the role of the ETB in reskilling and upskilling.</p> <p>14.Renewables were not considered as a sector in themselves as the renewable sector is cross cutting across all sectors of society and the overarching policy on climate change in chapter identifies that.</p> <p>15.While Belview is within the MASP area there is potential for other locations within the MASP area for employment locations which could be identified. Include reference to this in Section 5.3</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>and Development and should consider the Waterford Metropolitan Area is included as a third strategic location for enterprise and employment and that additional reference to RSES policy on placemaking for enterprise development is included in chapter 5.</p> <p>16.Table 5.4 on page 64 omits the District Centre at Ferrybank from the summary of appropriate locations for retail development. reviewed and amended to fully incorporate an appropriate policy reference be included for Ferrybank at all relevant locations in the Draft Plan.</p> <p>17.The opportunities and requirements of the National Marine Planning Framework will require the inclusion of high-level objectives to be addressed and transposed into the Development Plan. The Council is requested to review and address the issue of Marine Spatial Planning in terms of its economic and environmental management policies.</p> <p>18.Within Chapter 5, the council should outline its support for the delivery of high quality co-working hubs of scale within or near Kilkenny City, the MASP area and in rural communities within Kilkenny.</p> <p>19.The Council is requested to strengthen the Draft Plan's policies for community and education with a view to additional policy content to address Lifelong Learning and the development of the Southern Region as a Learning Region</p>	<p>16.Table 5.4 is a description of the hierarchy at present. It is an objective to have a District Centre in Ferrybank. Refer to Table 5.3 and the Ferrybank/Belview Local Area Plan.</p> <p>17.Insert in Chapter 1 a new section referring to the National Marine Planning Framework. Its potential adoption and an objective to review the CCDP to ensure compliance with NMF when it is adopted.</p> <p>18.In section 5.1.1 under Covid -19 refer to change to remote working and include an objective to facilitate remote working hubs with settlements.</p> <p>19.Under 6.13.3 insert a sub section 6.13.3.1 on lifelong learning and the Learning region</p> <p>20. The request to amend objective 8K is noted. However it is noted that there is a rail review underway at present and it is</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>20.Objective 8K should be amended to provide for retention of the Waterford Rosslare rail Corridor for future freight and passenger use alongside any proposed Greenway long this route. Chapter 8 should include an objective for the preparation of a Metropolitan Wide-Open Space, Recreation and Greenbelt Strategy to include the identification of a location for Regional Scale Park within the Waterford Metropolitan Area as well as the development of neighbourhood parks and open spaces</p> <p>21.Section 9.2.3 should reference Blue as well as Green infrastructure to recognise the interaction between green infrastructure and rivers, streams, and other water bodies.</p> <p>22.Section 12.8-Ports could be strengthened to include an explicit objective for provision of rail freight handling facilities and infrastructure. This would reflect the content of chapter 12 and would support RSES RPO 170-Rail policy to optimise rail freight opportunities in the Southern Region Ports and strengthen alignment with RPO 140 –International Connectivity, RPO 144 – Port Infrastructure.</p> <p>23.It is recommended that the final Kilkenny CDP 2021-2027 include a framework for the intended monitoring and implementation of the CDP Objectives, including a commitment to share data and engage with the regional tier during the monitoring stage.</p>	<p>considered prudent to await the outcome of such review prior to amending the objective as suggested.</p> <p>Recommendation: Insert an objective for a Metropolitan Wide-Open Space, Recreation and Greenbelt Strategy to include the identification of a location for Regional Scale Park within the Waterford Metropolitan Area as well as the development of neighbourhood parks and open spaces.</p> <p>21.Include a reference to Blue as well as Green infrastructure in section 9.2.3 to recognise the interaction between green infrastructure and rivers, streams, and other water bodies.</p> <p>22.The text of 12.8 already refers to supporting and promoting the "development of the necessary port infrastructure and associated industrial and distribution activities as well as associated rail and road connectivity required to support the development of the Port of Waterford, Belview"</p> <p>23.The final Kilkenny CDP 2021-2027 include a framework for the intended monitoring and implementation of the CDP Objectives,</p>
KK-C162-414	Department of Education	1.The Department welcomes the policy approach that the provision of educational facilities should be planned and	1.Noted.

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>implemented in concert with residential development and welcomes the Council's commitment to continue to liaise with the Department in regard to the development of schools.</p> <p>2.The Department has considered the Draft Plan in the context of projected population growth in the County to 2031 and anticipates that some requirements for additional educational accommodation may emerge over the lifetime of the Plan, should the projected population increases materialize, but did not identify a requirement at this stage to zone additional school sites. In the interest of compact growth, the facility to expand existing schools and/or to otherwise maximise the use of existing school sites will be critical for the community in Kilkenny and for the Department in the future. The inclusion of a specific objective in the Plan explicitly supporting the intensification of development on existing school sites would be welcomed.</p> <p>3.There may be some requirement for school place provision at primary level, should the proposed population increases materialize. The Department considers that these requirements will be met by the existing school network and by the establishment of a new primary school in the western environs of the city.</p> <p>4.Department notes that the projected population for Kilkenny would generate an extra requirement at post-primary level. The Department expects that requirements will be met by the delivery of a number of projects within the city, which include</p>	<p>2.Recommendation: Include a policy supporting the intensification of development on existing school sites would be welcomed while maintaining sufficient space for required minimum standards of play and recreational facilities</p> <p>3.Noted.</p> <p>4.Noted.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Response & Recommendation
		<p>the development of two post-primary schools in the Breaghagh Valley as noted in Section 3.8 of the plan.</p> <p>5. There will be additional school place requirements in the Ferrybank/Belview area which are being considered in the context of the wider Waterford MASP.</p> <p>6. In other settlements the expected level of increase does not warrant zoning additional school sites. It is anticipated that requirements (if they do arise), can be met by expansion of existing facilities.</p>	<p>5. Noted.</p> <p>6. Noted.</p>
KK-C162-418	Office of the Planning Regulator	See text below.	A detailed submission was received from the Office of the Planning Regulator which outlined 8 recommendations and 8 observations in respect of the draft Plan. These are dealt with in the following pages.

Response and Recommendation of the Chief Executive

Recommendation 1:

The Planning Authority is required to review the proposed Core Strategy (including Settlement strategy and associated identification of development potential and zoning exercises) and HNDA, and to revise as necessary to comply with the requirements of the Section 28 Guidelines: Housing Supply Target Methodology for Development Planning and Appendix A of the accompanying Ministerial Circular.

Subsequent to the publication of the draft Plan on the 22nd December 2020, the Department of Housing Planning & local Government published a Ministerial Circular relating to Structural Housing Demand in Ireland and Housing Supply Targets, and associated Section 28 Guidelines: Housing Supply Target Methodology for Development Planning on the 23rd December 2020.

The Department of Housing, Local Government and Heritage intends to utilise the ESRI NPF 50:50 City housing demand projection as a mechanism to assist in evaluating whether the housing objectives of the NPF are being achieved and the national spatial policy is being reflected in the emerging housing delivery patterns across the country

Notwithstanding the methodology applied in the Core Strategy of the Draft Plan, the publication of the Guidelines now requires that the Core Strategy is consistent with NPF and the demand projections set out in the Appendices in the Guidelines.

Core Strategy as published in the Draft Plan

For Kilkenny city, when considering a 30% growth projection to 2040, it is projected that with linear growth, this equates to a population uplift of 3,641 over the period of this plan to a total of 30,153 by 2027. This is in the context of a population target for the County of 11,840. This is set out in Table 4.7 of the draft.

Table 4.7: Core Strategy 2016-2027					
(1)	Core Strategy population allocation 2016 - 2027 (2)	Density (3)	Housing land requirement to 2027 (hectares) (4)	Compliance with NPO 3C (5)	Zoning (Hectares) (6)
County Kilkenny	11,842				
Kilkenny City	3,641	35/ha	37.8 ²⁸	(30%) 11.3ha ²⁹ inside CSO boundary and (70%) 26.5ha outside CSO boundary	39.46 Ha ³⁰ zoned outside CSO
Ferrybank/Belview (Part of MASP)	1,452	35/ha	15	(50%) 7.5ha inside CSO boundary and (50%) 7.5ha outside CSO boundary	28Ha
District Towns					
(a) Callan	441 ³¹	20/ha	7.65		7.65Ha
(b) Castlecomer	264	20/ha	5.5		5.5Ha
(c) Graigueenamanagh	278	20/ha	6		6Ha
(d) Thomastown	437 ³²	20/ha	6.7		6.7Ha
Smaller Settlements	1,284 ³³	10/ha	128		
Remainder area**	4,045				
Rural Housing			122 ³⁴		
Total	11,842				93.31

This methodology is based on population projections whereas the preferred methodology is based on housing projections and completions. Converting these population projections to households³ gives a figure 4,307 housing units required for the County with 1,324 units for the City.

This devolved then into a land requirement of 37.8ha for the City.⁴

These established NPF Roadmap population

projections for each county continue to be the population parameters for local authority development planning processes.

The Department commissioned the ESRI to further develop work previously undertaken for the NPF.

The revised approach is based on the following:

- ESRI projected NPF scenario new household demand 2017 to Q2 2027; (5,448 households)
- Actual new housing delivery 2017-2027 at 1275 units;
- Existing housing demand data (homeless households, and estimated unmet demand based on Census 2016) at 95 units;

This approach is in contrast to the utilisation of population projections which, although important, can only be assessed with one fixed date every five years as part of a national census of population.

³ Using 2.75 as the average household for the Plan period.

⁴ See column 4 in table 4.7

The growth for the City & County in terms of Housing demand is set out below in accordance with the Ministerial guidance issued under Section 28 of the Act on the 23rd of December 2020.

	Kilkenny County Council	Annual Average Households	Total Households
A	ESRI NPF scenario projected new household demand 2017 to Plan end mid 2027, or quarter (pro-rata)	Total projection/ relevant time period 5,448⁵/10.5=519	Total projection A 5,448
B	Actual new housing supply 2017 to most recent available year or quarter prior to Plan commencement	Total completions /relevant time period '17 – 196 '18 – 221 '19 – 288 ('20 – 380) so Q1 '21 to Q2 '21 = 380/2 = 190 Total = 1,275/4.5=220	Total completions B 1,275⁶
C	Homeless households (latest data), and unmet demand as at most recent Census	N/A	Total existing unmet demand C Homeless 95
D	Plan Housing Demand = Total (A-B+C) (Projected ESRI NPF demand – new completions + Unmet demand)	Total Plan Demand/6 years 4,268/6 =711	Total Demand for full 6-year plan period 5,448^A-1,275^B + 95^C = 4,268
E	Potential adjustment 1 to mid-2027 portion of plan period to facilitate convergence to NPF strategy (where justified)	Mid-point between ESRI NPF and Baseline scenarios to 2027 in lieu of A above	Adjusted Total Demand
E1	ESRI Baseline scenario projected new household demand 2017, to end 2027	5,941/10= 594	5,941⁷
E2	NPF ESRI baseline demand to mid 2027		269 (538/2)
E3	Mid-point between A and E1 (ESRI NPF and Baseline scenarios, to Q4 2027)	5,560/10 = 556	5,448^A-269^{E2}+5,941^{E1} =11,120/2= 5,560
E4	Adjusted Total Plan Demand calculation based on E2 and E3 in lieu of A above	(4,649/6) = 775	(269^{E2} + 5,560^{E3}- 1,275^B) + 95^C = 4,649

⁵ Total housing demand 2017 – 2027 from ESRI research for NPF scenario

⁶ House completions 2017 - 2021

⁷ ESRI housing demand for do nothing scenario

The Draft plan projected a housing equivalent need for **4,307 housing units using an average housing occupancy whilst Section 28 calculations project a need for 4,649 units, resulting in a difference of 342 units over the 6 years period of the plan**

Recommendation 2: Distribution of population

The planning authority is required to revisit, in an evidence-based approach, the distribution of new population growth and housing targets Recommendation 1) across the five tiers of the county settlement hierarchy to ensure greater national and regional policy alignment: **(having regard to the distribution across the hierarchy proposed then is as follows**

Table 4.7: Core Strategy 2016-2027					
	Core Strategy population allocation 2016 – 2027	Household Demand NPF 50/50	Housing land requirement to 2027 (hectares)	NPO 3C	Zoning (Ha)
(1)	(2)	(3)	(4)	(5)	(6)
County Kilkenny	11,842	4,649			
Kilkenny City	4,144	1,627(35%)	46.48 ⁸	(30%) 13.9ha ⁹ inside CSO boundary and (70%) 32.2ha outside CSO boundary	18.6ha Ha Abbey Quarter 4.4Ha (30-35%) plus 25Ha mixed 42.84Ha ¹⁰ zoned outside CSO
Ferrybank/Belview (Part of MASP)	1,452 2320 ¹¹	910(19.5%)	26	(50%) 14ha inside CSO boundary and (50%) 14ha outside CSO boundary	28Ha
District Towns					

⁸ 1627 households divided by 35units/ha = 46.48 ha.

⁹ The Council has established through its own research that there is more than sufficient capacity within the existing built up area to cater for this increase.

¹⁰ See Housing Strategy and Core Strategy Volume 2

¹¹ Estimated based historical population distribution model in PLUTS 2004 2016- 2026. (subtract no of units built in ferrybank to 2021)

(a) Callan	441 ¹²	160 (3.4%)	8		7.65Ha
(b) Castlecomer	264	93 (2%)	5.5		5.5Ha
(c) Graigueenamanagh	278	100(2.1%)	6		6Ha
(d) Thomastown	437 ¹³	159(3.4%)	6.7		6.7Ha
Smaller Settlements	1,284 ¹⁴	467(10%)	128		
Remainder area**	3,542	1,133(24.37%)			
Rural Housing			58 ¹⁵		
Total	11,842	4,649	284.68		115.29

The Planning Authority, in conjunction with the office of the Planning Regulator, have reviewed the housing figures in accordance with the Section 28 Guidance as required. In accordance with ESRI housing figures, the guidance predicts that by mid-2027 (the period of the plan), the County will require an additional 4,649 units. The Draft plan predicted 4,307 over the same period. An additional 342 units will therefore have to be provided for throughout the county.

Targeting a 35% growth to Kilkenny City gives a requirement of 1,627 houses and at 35 units per hectare a gross land requirement of 46.5 ha. Securing a minimum of 30% of that growth within the existing built up area¹⁶ leaves a requirement of 32.2 ha of new residential on greenfield lands in the City.

For Ferrybank the population allocation to 2027 is increased by 159% from the draft (910 houses) as a first step to supporting the concentric city model for the Waterford MASP area.

The District towns have an increased allocation of housing units amounting to 10.9% of the predicted demand.

The smaller settlements tier have been allocated 1,284 units (10%).

The Rural allocation for one-offs and villages is allocated 1,133 houses respectively. The numbers represent the expected proportional growth for the rural area and villages and is well in excess of the 810 one off house expected to be granted over the plan period.

Recommendation 3:

The planning authority is required to review its approach to the delivery of the Core Strategy objectives for the Tier 2 and 3 towns of Ferrybank / Belview metropolitan area, Callan, Thomastown, Castlecomer,

Response and Recommendation

Ferrybank is part of the MASP and has an extant Local Area Plan. There is an objective to review the LAP and incorporate its provisions into the City & County Plan. As acknowledged in the OPR submission

¹² The figure for Callan is an increase of 150 persons to 2027 over and above the 2019 LAP following review under this Core strategy.

¹³ The figure for Thomastown Includes an additional 150 persons to 2027 over and above the 2019 LAP.

¹⁴ See housing strategy

¹⁵ 700 Households divided by 12 units/ha = 122.5ha

¹⁶ CSO boundary is defined as the built up area

the draft Plan clearly acknowledges the strategic importance of this area in terms of its role as an employment centre in the south east region, the significant population growth targeted for the Waterford MASP area, and the vision for the Waterford MASP is to develop a concentric city north and south.

In addition, as a response to Observation 1 below, a further section has been introduced into the draft Plan on the Waterford Metropolitan Area to reflect its identification in the NPF and RSES as a priority location for significant housing and employment growth and for addressing challenges and opportunities for the MASP area.

In relation to Callan, Castlecomer Graigueenamanagh and Thomastown, each of these settlements have had local area plans adopted in 2019, 2019, 2021 and 2020 respectively. Each settlement has been allocated an additional increase in housing through the core strategy. These local area plans will be reviewed following the adoption of the finalised City and County Development Plan.

Each local area plan contains strategic objectives for each town consistent with sections 3.4, 3.8 and 3.9 of the Regional Spatial and Economic Strategy, including settlement boundary, compact growth strategy, key sustainable mobility priorities, core retail area, key regeneration sites, strategic employment sites, constraints such as flooding and other relevant development management criteria.

Having regard to the above it is considered that the draft Plan with amendments as proposed has sufficient detail in relation to Tier 2 & 3 settlements

Recommendation 4

The planning authority is required to revisit the development approach for Tier 4 settlements and provide a strategic and structured approach to the implementation of the plan's policy framework, thereby ensuring consistency with National Planning Objectives 3c, 6 and 7 and Regional Policy Objectives 3, 34, 35.

- a) land use zoning maps for the larger settlements in Tier 4,**
- b) Include specific local objectives such as the village core area, focal spaces, amenities and opportunity sites,**
- c) Identify land with development constraints such as flooding on the settlement maps**

Response & Recommendation

All the Tier 4 settlements have boundaries which have been provided having regard to:

- a) The existing footprint of the settlement,
- b) The CSO boundary,
- c) Natural Heritage ,
- d) Built heritage,
- e) Previous statutory planning documents such as expired LAPs,
- f) Previous non statutory documents such as village design statements,
- g) Flood risk assessment, details of which are included in the Strategic Flood Risk Assessment.
- h) Village renewal plans

There are 22 settlements with the Plan. Given the time frame involved it is not possible to complete the requirements of recommendation 4 within the statutory timelines.

In order to secure specific local objectives an objective will be inserted to carry out an analysis of the specific local objectives for each of these settlements.

Recommendation 5

The planning authority is required to quantify and clarify those areas of Tier 2, 3 and larger Tier 4 settlements (referenced in Recommendation 3 & 4) which will contribute to the cumulative delivery of 30% of all new homes within the built-up footprint of existing settlements and demonstrate consistency with the housing and population requirements set out in the Core Strategy and policy promoting compact growth through application of the brownfield definition as set out in the Section 28 Guidelines -Sustainable Residential Development in Urban Areas (2009)

Response & Recommendation

The local area plans for Tier 2 & 3 Ferrybank/Belview, and the District Towns all have New Residential, opportunity and /or brown field sites identified within them. The Planning Authority is satisfied that well in excess of 30% of new development within these settlements fall within their respective CSO boundaries and this was considered during the making of the plans. In the reviews of these plans to be carried out following the adoption of the City and County plan, which is an objective of this draft Plan, a further review of the identified sites will be carried to ensure that the new Section 28 Guidance figures are implemented with due regard to NPOs 3c and 33 and RPOs 34 & 35.

Recommendation 6

The planning authority is required to revisit, in an evidence-based approach, the inclusion of the area to the north west of Piltown and Fiddown within the designated ‘other rural areas’ as defined in Figure 7.1, ‘Rural Housing Strategy’ in the draft Plan to ensure consistency with national and regional objectives to regenerate and reverse the decline of small towns and villages (NPOs 6, 16, 18a and 18b)

Response & Recommendation

The Planning Authority has revisited in an evidenced base approach the designation of the “other rural area” northwest of Fiddown & Piltown”. The Planning Authority acknowledges the point made in the submission that the area has good strategic road links to the Waterford MASP, along the N24, with approximate drive times of 30 –35 minutes to Waterford City. It is also noted that the population in the relevant EDs has seen an increasing trend over time.

Recommended to include the EDs of Whitechurch, Tullahought, and Booleyglass within the area of urban influence.

Recommendation 7

The planning authority is required to review the policy objective 15 of the retail policies under section 5.4.7 of the draft Plan to include additional policy objectives in the draft Plan to:

- a) address mechanisms and deliverable timelines to ensure that the Joint or Multi-Authority Retail Strategy for the Waterford Metropolitan Area will be undertaken with adjoining relevant authorities,
- b) appropriately restrict further retail provision in the Ferrybank / Belview Local Area Plan area until such time that the Belview Local Area Plan is revised and incorporated into the County Development Plan.
- c) ensure that the Joint or Multi-Authority Retail Strategy for the Waterford Metropolitan Area is completed prior to the review of the Ferrybank / Belview LAP, 2017,

Response & Recommendation

Amend policy 15 Section 5.4.7 to read as follows

In cooperation with Waterford City and County Council, develop a mechanism and deliverable timelines to carry out a joint Retail Strategy with Waterford City and County Council for the area covered by the Waterford Metropolitan Area Strategic Plan (MASP) in accordance with the Retail Guidelines and Waterford MASP policy Objective 19 of the RSES.

It is recommended to add the following objective to section 5.4.6

Ab To carry out the Joint or Multi-Authority Retail Strategy for the Waterford Metropolitan Area within 12 months of the coming into effect of this Plan.

Recommendation 8

The planning authority is required, in consultation with the NTA (and TII), as appropriate, to:

- a) Supplement table 12.1, vol.1, existing baseline figures for modal share for the overall county to include baseline details and 2040 modal share targets for the 4 no. district towns and at aggregate level for rural towns and villages and the open countryside, as identified in the Core Strategy.
- b) Provide an effective monitoring regime for the implementation of the planning authority's sustainable transport strategy and the modal share targets in particular

Response & Recommendation

It is an objective of the existing Local area Plans of Callan & Graigueenamanagh that mobility plans are prepared. An objective will be included in the draft plan in Section 12.3.2 as follows:

12E To prepare mobility management plans incorporating mobility objectives of the local area plans for Thomastown, Castlecomer and Piltown

It is recommended that, in conjunction with the NTA, the Council develop a monitoring regime for implementation of the Modal Shift targets and to amend objective 12F as follows:

"12 F Implement Strategies to meet the mode share targets during the lifetime of the plan and develop, in conjunction with the NTA, an effective monitoring regime for the implementation and where required, adjustment of the Council's sustainable transport strategy in order to ensure the achievement of the modal share targets referred to under Objective 12G"

Observation 1

The planning authority is advised to give further consideration to including, in the Plan, additional content on the Waterford MASP to reflect its identification in National Planning Framework and RSES as a priority location for significant housing and employment growth and develop the Waterford MASP vision for the Metropolitan Area to become a regional economic driver of growth and promoting the rebalancing of regional development in a sustainable manner. It is considered that a joint approach with Waterford City and County Council.

Response & Recommendation

A distinct section will be included under 4.3.2.2 to reflect the MASP area identification in the NPF and RSES as a priority location for significant housing and employment growth and addresses challenges and opportunities for the MASP area.

Observation 2

Having regard to RPO 34 on Regeneration, Brownfield and Infill Development within the RSES, the planning authority is advised to:

- include a clear objective to implement the Active Land Management Strategy approach
- set out a clear timeline and strategic approach to carrying out the Active Land Management approach,
- set measurable targets (perhaps by settlement at the upper levels) and timelines against which the implementation can be monitored and measured, and
- establish a database with site briefs specifically for brownfield sites zoned for development which will be continually renewed and updated as opportunities arise through active land management process.

Response and Recommendation

Include the following text in Section 4.2.1

The Council will continue to implement its Active Land Management approach through the implementation of Derelict Sites Act, the Vacant Sites Levy, the development of site briefs.

The Council will use the results of its activity under Derelict sites and Vacant Sites levy to monitor progress in activation of lands within the settlement hierarchy.

Observation 3

The planning authority is advised to review the 'broad rural objectives' and the objectives 'to guide rural development' included in section 7.1, vol. 1 of the draft Plan, and give consideration to formulating a policy objective that supports sustainable development and settlement patterns in rural areas while enhancing connectivity, and attractiveness of the built environment consistent with policy objectives in the National Planning Framework, 2018, NPO's, 15, 16, 21, and the Southern Regional Assembly Regional Spatial Economic Strategy RPO's 27 & 50.

Response & Recommendation

Chapters 5 and 7 of the draft Plan deals effectively with the diversification and sustainable development of rural areas which it is considered deal with issues raised in relation to NPOs 15,16, and 21 and RPO 50. In relation to the protection of the viability of smaller towns and rural settlements the following text will be included in section:

To address concerns raised about RPO 27 the following text will be included in Section 4.6.

“The Council will seek to protect and enhance the viability and vitality of smaller towns and rural settlements (settlement nodes) within the County”.

Observation 4 Forestry policy objective

The planning authority is advised to review the policy objective in relation to forestry in Section 7.4.Vol. 1, of the draft Plan to ensure that this objective is a referenced policy objective consistent with provision of policy objectives throughout the draft Plan.

Response & Recommendation.

The text of the entire Plan Vol1 and Vol 2 is a statement of Council policy. **No change recommended**

Observation 5 Retail

The planning authority is advised to review paragraph 2.9.11 of volume 2 of the draft Plan, which contains the zoning matrix of permitted uses for the land use zoning objective ‘Business Park’, including retail warehousing as a permitted use, to ensure that there is no conflict with Policy Objective 13 under the paragraph 3.4.5 of ‘Retail Policies’ of volume 2 in the draft Plan.

Response & Recommendation

The Planning Authority is satisfied that there is no conflict. Individual retail warehousing units are not intended to be excluded.

No change recommended.

Observation 6 Climate Change

The planning authority is advised that section 2.5, vol. 1 ‘Strategic Objectives’ of the draft Plan should also include an objective to consider a variation of the development plan within a reasonable period of time, as may be appropriate, to ensure the development plan will be consistent with the approach to climate action recommended in the revised Development Plan Guidelines as adopted or any other relevant guidelines.

Response & Recommendation

An objective will be included in Section 2.5 as follows:

“The Council will monitor revised Government Guidelines and statutory requirements and will propose an appropriate variation of the City & County Development Plan to ensure consistency between the approach to climate action at local and national policy level.”

Observation 7 Renewable Energy.

Having regard to the requirements of section 9(4) of the Act, the Planning Authority is requested to coordinate the objectives for wind energy development in the development plan, with those of the

neighbouring counties, to ensure a coordinated Wind Energy Strategy across the region. Particular coordination shall be required with Laois County Council where current conflicts arise in the identification of preferable locations in the consideration of their Draft Development Plan.

Response & recommendation

In preparing the wind energy strategy regard was had to the adjoining wind energy strategies. Where conflicts arose these were examined and where possible resolved. Where it was not possible to resolve these differences are acknowledged.

No change recommended.

Observation 8

The planning authority is advised that in order to give full meaning to the strategic environmental assessment process as set out in the directive, it should ensure that as/when material amendments stage arise, the environmental reporting is iterative and transparent with the decision-making process at that stage.

Any proposed material alterations will be subject to the relevant environmental assessments, including the iterative stages of Appropriate Assessment, Strategic Environmental Assessment and Strategic Flood Risk Assessment.

2.2 Section B: Other Submissions

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KKC162-1	Peter Purcell	1.Submission enquires as to why the section of the settlement boundary to the east of the railway crossing at Garrandarragh, Mullinavat was not extended all the way to the Motorway.	1.Adequate lands are available in the current boundary, which promotes a compact town for in accordance with the NP requirements for Compact Growth. Residential lands adjacent to a Motorway may also not be in the interest of future residential amenity.
KKC162-2	Mairead Eoin	1.The submission states the N77 road between the Castlecomer roundabout and Dunmore is a very dangerous road catering for large volumes of traffic and is not conducive to walk/cycle to school or work from Dunmore village into Kilkenny and requests that the N77 road between the Castlecomer Roundabout and Dunmore Village be upgraded/widened, providing cycle and footpaths and lighting.	1.The N77 is under the control and management of Transport Infrastructure Ireland (TII). The Council will bring the expressed need to the attention of TII. The works for the new Kilkenny Biodiversity Park will provide pedestrian and cycle access to Dunmore village, on the Bleach Road.
KKC162-3	KSM Ventilation	1.Submissions for the inclusion of 2 ha of additional lands to the North of Stoneyford (Norelands Road) within the settlement boundary. Currently 5ha of the site is included in the boundary. A Map is attached.	1.The lands are 2 Acres in extent and are an isolated add on to the existing settlement boundary. Given the extent of existing lands within the development boundary it is not considered necessary.
KKC162-4	EPA	See Section 2A above.	
KKC162-5	Derek Morrissey	1.Mr. Morrissey has been renting in Bennettsbridge for 4 years and would like to build there. Mr Morrissey would like the criteria for building in the area reviewed and would like	1.The Rural Housing Policy is based on Ministerial Guidance on Rural housing under Section 25 of the Planning Act and Objective 19 of the National Planning Framework, which

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		to see a proper system for deciding who can and cannot build in an area based on fairness and equality.	requires that the criteria should have regard to the viability of smaller towns and rural settlement. The draft Plan under objective 4J supports the provision of Services Sites for small towns and villages under Objective 18b of the National Planning Framework. In this regard 22 villages with Social and Engineering Infrastructure have been identified for growth. Within the boundaries of these villages the Rural Housing Policy will not apply. Small clusters of housing will also be allowed in smaller rural nodes.
KKC162-6	Geological Survey Ireland	See Section 2A above.	
KKC162-7	Nuala Cuffe	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-8	Ormonde Street Car Park	1.The submission states that the current 4,500 city centre parking spaces are sufficient to cater for the Abbey Quarter Development and a temporary car park is not required on site. The provision of circa 100 more car parking spaces within the city centre is unacceptable, but coach parking on the Abbey Quarter site is welcomed.	1.The report being referred to does not reflect Council policy on parking in Kilkenny City. The council will look to develop a parking strategy for the city that will take account of issues such as existing parking provision, future development including compact growth, increased population, modal shift, and the impact of the potential removal of city centre parking to facilitate cycling lanes, outdoor seating areas etc.
KKC162-9	Margaret Tobin	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KKC162-10	Anne Baily	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-11	Donal Higgins	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-12	Robert Pearson	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-13	Daniel O'Mahony	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-14	Aisling Freaney	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-15	Cora Freaney	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-16	Anna Morrissey	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-17	Donal Deering	1.District Heating (DH) should have its own heading in the plan. With proposer funding DH may become the norm. The 100% target for electricity may be high and 70% more realistic.	1.The concept of District Heating is dealt with under Section 11.6 Bioenergy. Recommendation: Following consultation with the 3CEA it is considered that a section particularly dealing with district heating should be included.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
			Recommendation: That a section dealing particularly with district heating be included in the Plan (See also Ref. KKC-162-6).
KKC162-18	Paudie O' Neill	1.Submission makes proposals on a cycle strategy for Thomastown area of Kilkenny, using the town as a hub with a "spiders web" of 20km routes on secondary roads radiating from Thomastown to connect with neighbouring villages. The proposal includes suggestions for information and secondary facilities such as overnight, taxi and servicing. A map showing the proposed routes is attached.	1.Objective 12H of the draft plan makes provision for the compilation of a cycling strategy for the County. The submission as received and the issues raised are valuable and would be appropriate when the strategy goes out on consultation. There is an existing identified cycle trail (East Kilkenny cycle on road trail which identifies Thomastown Inistioge and Graiguenamanagh (see Trail Kilkenny) There is potential to build on the existing proposal with this submission with Trail Kilkenny. The development Plan is supportive of such development.
KKC162-19	Paudie O' Neill	1.Proposal for an eco-village and serviced sites with approximately 50 half acre sites at Dangan and Carrigmurraun junction, 1.5km from Thomastown centre/bridge. The submission states the proposal is compliant with various objectives of the plan, but would require water/wastewater and a footpath/cycleroad. Proposed location map and layout submitted.	1.The location of the site, due to its remove from the town of Thomastown and the requirements for expensive services does not comply with the principles of compact growth as promoted in the NPF, the RSES and the draft plan. 2 Ha have been zoned for serviced site in Thomastown in the recently adopted Thomastown Local Area Plan to provide for Serviced sites in the town in accordance with objective 18b of the NPF.
KKC162-20	Eastern Midland Regional Assembly (EMRA)	See Section 2A above.	

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KKC162-21	Tullahought Community Development Ltd. (Tullahought Tidy Towns)	1. This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley and outlines that Tullahought have been competing in the Tidy Towns competition since 1991. This success is aided by the natural landscape and terrific views of the area. See discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-22	Sheenagh Raggett	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC-162-23 KKC-162-46 KKC-162-85 KK-C162-87	Mark Collins Paul Cummins Nicola Cummins Marilyn Young	1.There is a need for 500-person facility multi-sport facility catering for wheelchair Sports or In-line Hockey or any other "roller" sport (without significant damage to timber floors). Provision for a facility consisting of two inline hockey pads needs to be included in the Plan, providing for a number of other minority indoor sports. The facility would be operated by Kilkenny City Minority Sport and Recreation Trust (the Trust) who would have a formal operating agreement with the Council.	1.Due to the strategic value of the facility such as this to the wider county, it is considered that the facility would be best located in the Kilkenny City area. The proposed land use is compatible with land currently zoned Amenity/Open Space and othe land uses. The Plan currently supports the development of active recreational facilities.
KKC162-24	Zoe Freaney	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-25	Ahenny Action Group	1.This submission relates to the Wind Energy Strategy and is concerned about impact of wind energy developments on the scenic aspect of the Ahenny and Lingaun Valley area. See discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		2.Believes that the Government guidelines on 500 metres separation distance between wind turbines and dwellings is both inadequate and unfair.	2. The Draft Plan is aligned with Government policy in this regard.
KKC162-26	Genevieve and William Cody (duplicate of KKC162-41)	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-27	TII	See Section 2A above	
KKC162-28	Ed O'Shea	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-29	Port of Waterford	<p>1.There is opportunity to expand the footprint of the IDA Enterprise Area through the zoning of additional lands for the purpose of related activities, for example, storage and distribution centres, engineering and educational facilities in support of the off-shore renewable energy sector and a range of other associated businesses and services.</p> <p>2.The plan should adopt a more flexible approach to the accommodation of more general office use at Marine Point related to supporting wider port-related activity, including FDI and their related logistics and supply chains and quay side developments such as assembly of wind turbines.</p>	<p>1.The Ferrybank-Belview LAP will be reviewed in accordance with objective 4I following the adoption of the City and County Development Plan. The issue of additional zoning for employment in the area will be considered accordingly.</p> <p>Recommendation: Insert a timeline for the commencement of Objective 4I 6 months from the coming into effect of the County Plan.</p> <p>2.The Plan supports Belview as a strategic employment hub and related matters will be considered in the review of the Ferrybank- Belview Local Area Plan in accordance with Objective 4I.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KKC162-30	O'Loughlins Gaels GAA Club	<p>1.The submission highlights the requirement from Kilkenny Local Authority of two additional playing pitches in the St. Johns Parish area for O'Loughlin Gaels GAA Club. A map indicating the area is attached. The reasons are:</p> <ul style="list-style-type: none"> • Growing Club membership • Catering for large variety of sport • Wish to improve overall levels of community sporting and leisure participation • Growing demand to accommodate diverse population in the area 	1.The provision of playing pitches is compatible with existing Amenity/open space zoning/Recreation zoning. The Council will examine any proposals for locations for facilities as they arise.
KKC162-31	Caiseal Conservation Committee	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-32	The Village Business Campus	<p>1.Proposal to change zoning the 0.7Ha site of the former St. Josephs religious institution to "Mixed use" or "Residential" as against the current "Community" zoning.</p> <p>2.Community-based use in the area cannot independently support the infrastructural costs associated with its provision and the associated costs of bringing the surviving building stock on site up to current standards.</p> <p>3.The proposed site by reason of its location and close to the urban edge is well suited to plan a mixed-use development such as a boutique hotel. It is submitted that the rezoning of the subject lands for mixed use creates a</p>	<p>Recommendation: Change the zoning from community facilities to mixed use development.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		greater viability for the development of the site and the sustainable reuse of the existing structures on site. 4.The site is well serviced, located on the fringe of the existing urban edge and is highly attractive for development.	
KKC162-33	Tom Morrissey	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-34	Thomas & Anne Hearne	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley. 2.There is a moated building (recorded monument) on their property which may be impacted by wind energy developments.	1.See discussion under Section 3.1 Lingaun Valley. 2. The Draft Plan sets out a Wind Energy Strategy that is in line with Government policy as set out in the <i>Wind Energy Development Guidelines</i> ¹⁷ . Every application for a wind energy development is assessed against the relevant development management standards in relation to the impacts on adjoining properties, including on protected archaeological heritage sites.
KKC162-35	Ger Lyster	1.Proposal for zoning of lands above the school at Kilmacshane, Inistioge. The lands were zoned in the 2007/2008 Inistioge Local Area Plan and permission granted by ABP at the time. The land comprises one of the few sites available for development in Inistioge.	1.Due to its geographic location, Inistioge has a limited extent of suitable lands available to support compact growth. The lands behind the Kilmacshane school are a natural extension to the boundary as currently identified and it is considered that proposed extension will still contribute towards compact growth as per the NPF.

¹⁷ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
			Recommendation: Include the lands to the rear of the Kilmacshane school into to the settlement boundary for Inistioge.
KKC162-36	Ger Blanchfield	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-37	Colette Hogan	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-38	John Blanchfield	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-39	Mary Blanchfield	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-40	Frank Walsh, Chair Lingaun Valley Tourism	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-41	Genevieve and William Cody	Duplicate of submission KKC162-26, see response above.	
KKC162-42	Lorraine Maher	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KKC162-43	Tara Heavey	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KKC162-44	Mark Lonergan	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-45	Kevin Healion	<p>Chapter 2 Volume 1 - Climate Change</p> <p>1.Planting more trees in our rural towns and villages can help mitigate the effects of climate change.</p> <p>2.Rewilding native forests and bogs can help boost biodiversity as well as help slow the run off of water into our streams and rivers therefore helping reducing the risk of flooding in our villages and towns.</p> <p>3.Working with and incentivising farmers will be important for the re-wilding of our landscape</p> <p>4.Promoting the health benefits of walking and cycling, and improving cycling and walking infrastructure in our towns can help towards reducing car emissions.</p>	<p>1.See Section 9.1. The Council promotes biodiversity and the planting of native trees and the implementation of the national Biodiversity Plan 2017-2021 and the Biodiversity Climate Change Sectoral Adaptation Plan 2019. Also see section 9.2.2.</p> <p>2.Noted. The opportunities biodiversity offers to mitigation and adaption of climate change is acknowledged in Section 2.4.4 Natural Heritage.</p> <p>3.Incentivising farmers is a national policy issue not appropriate for the Couty Development Plan.</p> <p>4.The plan does promote these, see Chapter 12</p> <p>5. The traffic management issues associated with schools is something that can be addressed during proposals to extend</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>5.Having car free zones outside schools during drop-off and pick up times have proven to be popular in Dublin and their introduction in Kilkenny would be a big positive.</p> <p>6.Micro-Forests are an increasingly popular way of planting trees in urban areas across Europe.</p> <p>Chapter 12 Volume 1 - Movement and Mobility</p> <p>7.A reduction of the speed limit to 30 km/h should be introduced in our town centres and outside all of our schools.</p> <p>8.Protected cycle lanes should be constructed in our rural towns especially on roads close to schools</p> <p>9.Suitable bicycle parking infrastructure needs to be constructed in our towns. Removing even a small number of unused spaces would allow more space for outdoor seating or space for bicycle parking.</p> <p>10.A proper rural bus scheme connecting our rural towns to each other and Kilkenny City</p> <p>11."Walking Buses" should be encouraged to promote active travel from a young age</p> <p>Chapter 6 Volume 1 - Town Centre First</p> <p>12.Supports town Centre first principle and active travel.</p>	<p>/ refurbish existing schools and in greenfield sites. Development Management considerations allow for this.</p> <p>6.Noticed.</p> <p>7.Speed limits in themselves are not a function of the development plan but policies encouraging greater sustainable modes of transport potentially resulting in reduced speed limits are contained within the Plan.</p> <p>8.The Council is undertaking Mobility Plans for the District towns and subject to funding, recommendations will be implemented accordingly.</p> <p>9.The provision of bicycle parking is being covered in the Local Transport Plan for the city and the mobility plans for the district towns.</p> <p>10.The NTA is currently investigating such a scheme under the Rural Transport Programme/Local Link.</p> <p>11.The Plan promotes walking. Walking busses are acknowledged in Volume 2, section 5.6.4.2 and will be an initiative that should be promoted in conjunction with the</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>13.Efforts should be made to convert unused space above shops and businesses on the main streets of our rural towns.</p> <p>14.The widening of footpaths will allow restaurants and cafes to have seating outside, boosting footfall.</p> <p>Volume 2 - Movement and Mobility Kilkenny City</p> <p>15.Supports 10-minute City concept and cycling infrastructure.</p> <p>16.An awareness campaign about the benefits of active travel and the ten-minute city would be a great step</p> <p>17.A map showing the cycle routes in the city and the times it takes to cycle to various locations from the city centre would be a useful aid.</p> <p>18.A bike sharing scheme would help boost cycling</p> <p>19.Introducing filtered permeability on residential streets can help reduce rat running</p> <p>20.Improved cycling and walking infrastructure will help reduce car dependency</p>	<p>relevant schools and is not a matter directly for the Development plan.</p> <p>12.Noted</p> <p>13.The Council supports the re-use of unused space into habitable spaces under the Living City Initiative in particular for the City and generally for the other settlements within the County.</p> <p>14.Noted.</p> <p>15.Noted.</p> <p>16.Noted.</p> <p>17.The 10-minute city will be further defined in the Kilkenny Local Transport Plan.</p> <p>18.A bike sharing scheme has been investigated and was not deemed viable, but new schemes will be considered</p> <p>19.This is a traffic management issue.</p> <p>20.This is supported in Chapters 12, volume 1 and Chapter 5 Volume 2 of the draft plan and will be a mainstay of the Local Transport Plan.</p>
KKC162-46	Paul Cummins	See submission ref. KKC162-23.	The issues raised here are dealt with under KKC162-23

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KKC162-47	Milo Power, Suir Valley Environmental Group	<p>This submission relates to the Wind Energy Strategy.</p> <p>1. Comments that Section 11.5.1 Current Status and Targets does not recognise that wind energy is a variable and unstable way to produce electricity, and adding more wind power only adds to the difficulty of a stable supply.</p> <p>2. See discussion under Section 3.1 Lingaun Valley.</p>	<p>1. The Wind Energy Strategy of the Draft Plan is in line with the Government targets for wind energy, as set out in the <i>Wind Energy Development Guidelines</i>¹⁸. Section 11.5.1 Current Status and Targets will be amended, see Section 3.4.</p> <p>2. See discussion under Section 3.1 Lingaun Valley.</p>
KKC162-48	Brock McClure on behalf of Marie Brannigan	<p>1. Proposed zoning of approximately 16 hectares of land currently zoned "Agriculture" on the south western side of the Freshford Road, opposite Aut Evan and approximately 2.5km to the north west of Kilkenny City. States lands would be suitable for some variety of aged care/nursing home facility with a low-density residential land use. Submission is seeking to zone a portion of the subject site or to include a specific objective that would facilitate a mixture of nursing home/retirement village/ step down housing/independent living units that would be suitable for the aging population, medical workers or those seeking a larger individual residential plot with the benefits of access to the town/city centre.</p> <p>2. A proposed zoning at the subject site of "Residential", "Mixed Use" or "Community Facilities" would facilitate some variety of a nursing home, aged care facility or low density residential that would provide for the ageing</p>	<p>The proposed zoning is located within an area which at present is beyond any planned development area (i.e it is located outside the Breaghagh Area and the Loughmacask area.</p> <p>Zoning of this area would be premature at this stage.</p>

¹⁸ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>population and the associated ongoing needs of Kilkenny City. St. Luke's Hospital is identified as an age friendly hospital and Aut Even are located in close proximity to the subject site.</p> <p>3.Submission supports the inclusion of "nursing home" in the list of permissible uses in Agriculture</p> <p>4.There is a requirement for substantial residential land use in Kilkenny City, with facilities for an aging population also necessary.</p> <p>5.Submission proposes that approximately 8 hectare land directly in front of the landowners existing house would remain as "Agriculture" and that the remaining land area would represent a suitable location for a nursing home/aged care/independent living units type development. The remainder (7.9Ha) would be more suitable as "Low Density Residential" to provide aged care/nursing home and low density residential.</p> <p>6.Quotes NPF, RSES and Ministerial Guidance based on ESRI figures on housing demand figures to demonstrate that future housing demand would justify the proposed zoning.</p>	
KKC162-49	Whyte PI Consultants on behalf of Daniel Fogarty	1.It is submitted that a portion of land of 7.3Ha adjacent to the proposed settlement boundary of Gowran be included in the settlement boundary. The land owner included his vision for the lands and a proposed masterplan and layout	1.The proposed site is located to the North and rear of Abbeygrove and the Gowran Nursing home. Gowran historical has grown in a linear form and the location of the proposed lands peripheral to Gowran will extend growth

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		is included in the submission. The land has good drainage and Wastewater Capacity of 50 units.	further along the R448 road towards Paulstown. Due to this peripheral location, the proposed lands will not contribute towards the compact growth of Gowran and would not be in the interest of the proper planning and development of the town.
KKC162-50	Richard Walsh	<p>1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.</p> <p>2.Expresses concern with the spread of the invasive plant Japanese Knotweed around the county.</p> <p>3.There is an indiscriminate amount of dumping of rubbish and litter in our countryside and the Council need to consider further measures.</p> <p>4. Roadside cutting of hedges and grass margins cause the shredding of litter, such as plastic bottles, aluminium cans, glass bottles, which are then impossible for the litter picker to collect, and cause damage in the wider environment. The Council should make it compulsory that anyone awarded a roadside cutting contract must carry out a litter pick before they begin.</p>	<p>1.See discussion under Section 3.1 Lingaun Valley.</p> <p>2. Section 9.2.10 Invasive Species sets out the Council's policy in relation to invasive plants such as Japanese knotweed.</p> <p>3.The issue of litter is addressed in the Council's Litter Management Plan, which is currently under review. The Council acknowledges that the primary enforcement response must come from Kilkenny County Council and the Litter Management Plan 2021-2023 sets out these enforcement measures.</p> <p>4. The Council's Litter Management Plan also sets out the requirements for such operational measures.</p> <p>5. Under the terms of the Wildlife (Amendment) Act, 2000 and the Heritage Act 2018 hedge cutting is generally only permitted between 1st September and 28th February each</p>

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		5. More effort should be made to carry out hedge cutting outside the nesting season.	year. The National Parks and Wildlife Service of the Department of Housing, Planning and Heritage is the responsible authority to enforce this legislation. Policies are set out in Chapter 9 of the Plan in relation to Hedgerows and development sites.
KKC162-51	Paul Brophy (Carlow Kilkenny FC)	<p>1. Imperative Buckley Park retains its zoning for Sporting/Community usage</p> <p>2. Request for all stakeholders, Carlow Kilkenny FC, Buckley Park site owners, FAI, Kilkenny and District League, Sport Ireland and Kilkenny County Council could come together to secure a long-term future for Buckley Park.</p> <p>3. The site is near the Western Environs project there is capacity to grow a League of Ireland Club. The new schools and homes would be a potential supporter base that could be developed over the coming years.</p>	<p>1. Buckley park is currently located beyond the Draft Development Plan boundary of Kilkenny City and is therefore not zoned. It does however have an historical use as a soccer stadium.</p> <p>2. Section 8.1 sets out policy to ensure that <i>"adequate recreational open space and facilities are provided for all groups of the population."</i></p> <p>3. The expansion of the current facility can be considered in the context of a suitable and viable proposal coming forward.</p>
KKC162-52	Peter Thomson on behalf of Garrett O' Carroll	1. Seeking a change in the "Amenity/Green links/ Biodiversity/ Open space/ Recreation" and "Existing Residential" zoning to a mix of "General Business", "Existing Residential" and "Amenity/Green links/ Biodiversity/ Open space/ Recreation" zoning in the Development Plan for a parcel of land at Black Quarry, Bennettsbridge Road, Kilkenny.	<p>The lands are isolated in themselves but would benefit from a more holistic approach to land uses in the area. A Master Plan for the development/assessment of the entire area stretching from Bennettsbridge rd to Marble Crest to Woodbine Avenue is considered to be acceptable.</p> <p>Recommendation Z 13 to be inserted as follows:</p>

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		<p>2.The former quarry is listed in the County Development Plan as a County Geological Heritage site and was the first location where the Kilkenny Black Marble was quarried in Ireland.</p> <p>3.Some previous applications have been submitted with community and planning gains included.</p> <p>4.It is requested that part of the "Amenity/Green links/ Biodiversity/ Open space/ Recreation" zoning is changed to "General Business" zoning. The site currently serves no public amenity function, which is the primary purpose of the open space zoning.</p> <p>5.Residential zoning would permit residential development but not the wider range of uses which could be appropriate if the quarry face was opened up within a designated public open space and the public invited to access this space.</p> <p>6.Bennettsbridge Road frontage has the potential for further commercial/ tourist development adjacent to the existing filling station. This could take the form of coffee shop/ café or cultural and educational use associated with the quarry, Residential development could be incorporated into a mixed development which would provide essential natural surveillance over the quarry face and its open space and public access. The following change is requested to the Draft Plan:</p>	<p>To complete a masterplan for appropriate configuration of the existing amenity lands and allow for other appropriate land uses such as limited housing and community uses in order to achieve the release of lands resulting in appropriate land uses in the most appropriate location.</p>

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		<p>7.The reduction in the extent in open space zoning in the former quarry, limited to the existing former quarry face and quarry face foreground with sufficient space for a walkway and viewing the quarry face.</p> <p>8.General Business zoning on the balance of the former quarry.</p>	
KKC-162-53	Peter Thomson on behalf of John Ryan	<p>1.Mr. Ryan owns 0.4 ha in The Rower village centre comprising a public house, house, agricultural outbuildings and associated ground. It is requested that the Development Plan provides for small serviced sites developments appropriate to the scale of the settlements to be permitted in designated Rural Nodes.</p> <p>2.It is also requested that the development of serviced sites is not restricted to persons who have satisfied rural housing policies; i.e., those with a demonstrable economic or social reason to live in a particular rural area.</p> <p>3.Modern proprietary wastewater systems reduce the site area previously required to facilitate a septic tank system for individual houses, thereby enabling a number of houses</p>	<p>1.The Development Management Guidance in the plan states that for Rural Nodes such as The Rower, where no settlement boundary is designated, individual housing sites or small clusters, sympathetic to the existing form, will be considered contiguous to the existing built up area so as to promote their contribution to place making and the strengthening of the settlement/village core.</p> <p>2. Twenty two (22) Larger settlements as defined by the CSO have been designated with a settlement boundary wherein the Rural Housing Policy does not apply.</p> <p>3.Local soil and groundwater conditions will determine whether individual wastewater treatments systems can be facilitated in housing clusters in compliance with EPA standards. It is an objective of the Plan to prepare design and best practice guidelines for the provision of cluster housing in rural settlements and rural nodes and it is expected that these guidelines will address wastewater treatment options.</p>

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		to be contained within a cluster on a relatively small site. Four or five rural houses to the acre are achievable with modern wastewater treatment systems, subject to ground conditions.	
KK-C162-54	Antoin O'Neill	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-55	Declan Blanchfield	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley. 2.Issue of disposal of decommissioned wind turbines needs to be addressed.	1. See discussion under Section 3.1 Lingaun Valley. 2.Environmental considerations of a wind energy development include the consideration of waste generation from construction and decommissioning. The Plan refers to the Development management guidance set out in the <i>Wind Energy Development Guidelines</i> ¹⁹ , which includes a section on Decommissioning and Restoration.
KK-C162-56	Fr. Patrick Dalton PP	1.No burial spaces left in Bennettsbridge cemetery and the plan should include provision for burial grounds. 2.Some lands next to the church were viewed and considered but the Parish Priest was not involved in this process. There was however no further feedback from the Council or Bennettsbridge Parish. It is not the Church's responsibility to provide a burial ground but the Parish of	1.There is some capacity within the 14 Local Authority burial grounds to cater for demand. Although there is no requirement on the Local Authority to address capacity issues associated with Parish / Church burial grounds, the Council did look to aid the situation in Bennettsbridge and assisted in developing a proposal for the Church/Parish to further develop in terms of consents, infrastructure etc. The development remains a matter for Church/Parish Councils.

¹⁹ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

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		Tullaherin/ Bennettsbridge would support in whatever way it could.	
KK-C162-57	Philip Fennelly	1.Proposes the inclusion of lands between Ennisnag and Stoneyford for low density dormer type development to help link Ennisnag and Stoneyford.	1.Notwithstanding the availability of wastewater capacity, the land is at some remove from the proposed Stoneyford settlement boundary and would not lead to the natural extension of either Ennisnag or Stoneyford. The inclusion of the land would lead to leapfrog type development which would militate against compact growth as require in the NPF and the integration of the development into the fabric of the town of Stoneyford.
KK-C162-58	Seville Lodge	1.Land currently zoned "Agriculture" and leases of the ETB and the HSE will expire during the plan. Seville lodge will need to reinvent itself. 2.Requests change from "Agricultural" to "Mixed use zoning" to its property on the Callan Road, including its undeveloped land to allow it the potential and flexibility to respond and adapt to the evolving needs on the community	1. The Council supports the uses at Seville Lodge as providing valuable social and educational services and supports the maintenance of the current uses. 2. The lands for part of larger block bounded by the Callan Road , the Ring Road the Kells road and objective R4 (new road link from the Callan Road to the Waterford Road roundabout) which would require masterplanning to achieve a range of suitable uses and appropriate connections to and from and within the area. In this context a change to "Mixed use" would be inappropriate No Change Recommended .
KK-C162-59	Neal McCormack	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.

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KK-C162-60 KK-C162-61 KK-C162-82 KK-C162-89 KK-C162-92 KK-C162-93 KK-C162-97 KK-C162-98 KK-C162-100 KK-C162-102 KK-C162-113 KK-C162-116 KK-C162-117 KK-C162-153 KK-C162-181	O'Neill Consultants on behalf of Michael Keogh Eoin Molloy Paul Ryan Shane Campion Canice Coogan Brian Malone Maurice Murphy Freida Campion Breda Murphy Kelly Allen and Ed Elder James Thompson Francis O'Mahoney Orla Skehan Mary Kelly	1.Residents of Rath Úllord and the Rath Úllord Residents Association raise concerns and objections regarding a change of existing zoned low-density residential lands and propose to maintain the existing Low-Density Residential zoning for the following reasons: 2.One estate with two different zoning objectives is not desirable. Rath Úllord should be considered as a single housing estate and the change will destroy its established low-density character. 'Existing Residential' opens up permissible densities to these lands, with no maximum density prescribed within the Development Plan. 3.Changes will not be within the spirit of the Core Strategy's place making principles, nor the Draft Development Plan, being Section 13, Strategic Aim, Section 13.3 and Section 6.5 (Housing Strategy, Appendix B). 4.Rath Úllord is not identified as a significant contributor to future projected housing demands which will be satisfied to the West of the City. 5.Development in the area to the front of the estate should be in keeping with current planning where small-scale retail such as shop or office space be maintained. This would add to what is now a very different work/life landscape where work hubs with excellent access to the ring road can be utilised.	1 – 7 The site related to Rath Ullard Housing development is located within the development boundary and the CSO boundary of the City. The Rath Ullord estate dates back to 2005 with 3 interlinked planning applications permitted under ref 05/479, ref 05/478 and ref 05/477. A total of 107 houses were permitted under those three applications resulting in a density of 4.6 units per acre (12.5 units per Ha). These permissions have been revised since under 17/533, 18/410 and 19/410 and 20/151, increasing the number of units to 136. This increased the density from the initial 11.3 units per Ha (4.6 per acre) to 15 units per hectare (6.25 per acre). Rath Ullard can still contribute to compact growth with a marginally higher density of 6/acre which is still considered low density in the context of Kilkenny City. The general business zoning is retained to allow for small scale commercial. The site is located with 10 minute cycle of the Newpark Neighbourhood centre. Dedicated cycle lanes and footpaths to the area are provided. Under the 2014-2020 City & Environs Development Plan the site is zoned for low density phase 1 with a small portion zoned general business. In the draft 2021-2020 City & County Development Plan the site is zoned as "Existing residential." The portion zoned for general business is retained.

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KK-C162-193 KK-C162-198 KK-C162-203 KK-C162-227 KK-C162-268 KK-C162-281 KK-C162-289 KK-C162-290 KK-C162-335 KK-C162-343 KK-C162-344 KK-C162-345 KK-C162-346 KK-C162-349 KK-C162-438	Rath Ullord Residents Association Aine Ryan Consulting Martin O'Brien Linda Murray David Rouse Padraic and Yvonne Treacy Thomas Cuniffe Eilis Bergin Tom Dowling Mark O'Duffy Nicola Ryan Eithne Lacey Brian O'Reilly James Kelly Jennifer McIntyre Olivia Downes	<p>6. There is no frequent public transport directly from Rath Ullórd to the City Centre and it remains outside the '10 minute' walkable City and is thus not suitable for high density of development. The absence of public transport, this will result in a substantial increase in traffic volumes.</p> <p>7. The infrastructure, primarily the road network now completed, was designed for the low-density residential units and currently has no capacity or scope to be upgraded for increased traffic flows that will be generated by the current land-use proposal for additional housing units.</p> <p>8. Many people have a demand for houses in low density areas and Low-density zoning is a positive tool to prevent one off houses in the countryside.</p> <p>9. Should the current Zoning in the Rath Ullord area be changed this will negatively impact the opportunity for a retail area and break the sequential approach outlined in the Development Plan.</p> <p>10. To change the zoning objective while the estate is under construction could lead the developer to resubmit for new planning permissions to increase the density as they have done in each consecutive planning permission to date including the most recent Planning Application.</p> <p>11. Development in the area to the front of the estate should be in keeping with current planning where small-scale retail such as shop or office space be maintained. This</p>	<p>In compiling the draft City & County Development Plan the Council had regard to National & Regional Policy as set out in the National Planning Framework and the Regional Spatial and Economic Strategy. For settlements of the scale of Kilkenny City National & Regional guidance requires Planning Authorities to provide for compact growth through Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.</p> <p>8. Section 5.12 of the Sustainable Residential Development in Urban Areas (2009) allows for lower densities in peripheral urban locations such as Rath Ullard, but advises Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency,</p> <p>The general business zoning is retained. This zoning also allows for residential use.</p> <p>10. Under recent permission 20/151 the Council already invoked special planning policy SPPR3 and allowed an increase in density in order to achieve more efficiency while not unduly impacting existing residential amenities and to</p>

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		<p>would add to what is now a very different work/life landscape where work hubs with excellent access to the ring road can be utilised.</p> <p>12.The primary schools in the area are oversubscribed which requires a lot of cars to travel across town at least twice per day</p> <p>13.There are no facilities for children to play within walking distance</p>	<p>still provide for new residential development appropriate to the scale and character of the settlement.</p> <p>Future proposals would also be assessed in the context of the character of the area and the impact on residential amenity that any future proposal would have.</p> <p>In the context of the development of the remainder of these lands it is not considered that school capacity in the area is a determinate factor. The Department of Education in consultation with the Council has not identified capacity of the schools in the area as an issue.</p> <p>There are open space areas within the scheme for local play space and there are other areas within walking distance.</p> <p>It is in this context that in drafting the Plan the zoning within the CSO boundary is now proposed as "existing residential" and in this particular case will replace the "low density residential" Any applications in the area will however still have regard to the scale and character of the area</p> <p>Recommendation: No Change</p>
KK-C162-62	Rebecca Linares	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KK-C162-63	St. Johns FC	1.To enable the club to expand, St. Johns AFC are particularly interested in the provision of suitable full-sized	1.The Club's aspirations for growth and access to playing pitches in the Breaghagh Valley, formerly referred to as the

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		playing pitches in the new Western Environs hub. The club has plans to further develop with juvenile teams alongside more junior teams. The club hopes to develop positive relationships with the three new schools, but currently has no facilities and without the availability of appropriate facilities for changing, the club has not been able to expand/grow with the demand that comes with being a soccer club.	<p>Western Environs, is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breaghagh Valley. These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p> <p>Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breaghagh valley.</p>
KK-C162-64	SLR on behalf of Belgard Estates Ltd	<p>1.Belgard Estates has a site measuring 0.81Ha between the villages of Slieverue and Milepost within the Metropolitan Area Strategic plan (MASP) Area. The site has operated as a concrete batching plant since 1966 and is located on a one way stretch of road, only accessible from Slieverue.</p> <p>2.The site is potentially serviced with a 200mm diameter water mains 200m from the site and a 225m sewer adjacent to the site.</p> <p>3.The NPF sets targets for urban densification and NPO 18b sets objectives for serviced sites.</p> <p>4.Site is located adjacent to Milepost infill zone in 2017 Ferrybank LAP.</p>	<p>1.Ferrybank Belview has a Local Area Plan adopted in 2017. Since then the RSES has been completed targeting a growth of 60% for the Waterford Metropolitan Area Plan (MASP).</p> <p>3.It is an objective of the Draft Plan to review the LAP, its zoning and its population targets having regards to the MASP and incorporate that revision into the City & County</p>

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		<p>5.It is requested that the planning authority consider the inclusion of a brownfield development policy which recognises the environmental benefit of re using land and reducing the need for greenfield development.</p> <p>6.It is requested that the site be included in the Milepost Infill zone to accommodate sites at 12 units per Ha.</p>	<p>Development Plan. (Objective 4I Pg.36) Zoning as requested would be premature in this context.</p> <p>Recommendation: Insert a timeline for the commencement of Objective 4I 6 months from the coming into effect of the Plan.</p>
KK-C162-65	Department of Transport	See Section 2A above	
KK-C162-66	Keep Ireland Open	<p>1.Lists requirements of plan to comply with e.g. RSES and NTA.</p> <p>Chapter 5 – Economic Development</p> <p>2.Section 5.4.6 Retail Objectives</p> <p>3.5O This Objective should be repositioned in Sec 7 Rural Development as a Development Management Requirement and replaced by: Only grant planning permission for new buildings</p> <p>Chapter 7 Rural Development</p> <p>4.Commonage Land</p> <p>5.Section should be upgraded to an Agricultural Objective and include amenity.</p> <p>6.Chapter 7 should also include further Objectives:</p> <p>7.Recognise and support the role of farmers as custodians of the natural resources of the countryside and of rural landscapes. Promote, at national level, the adoption of a Land Use Strategy.</p>	<p>1.The Plan complies with the requirements of the NPF, the RSES and the NTA</p> <p>3.This objective is relevant to the historic retail environment of the city and town centres and appropriate as placed.</p> <p>4.The policy to regard commonage as an environmental and recreational resource is considered adequate.</p> <p>7.Although Farmer's role is already recognised and supported under the Common Agricultural Policy of the EU, including same in the Plan would further support their role in this regard.</p>

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	Keep Ireland Open.	<p>8. Proposes changes to wording and new criteria for assessing applications for fencing in uplands to be included as an Agricultural Development Management Requirement.</p> <p>9. Section at the top of page 88 under Fencing should be a Development Management Requirement</p> <p>10. Section 7.4 Forestry - Submission suggest that coniferous forestry should be regarded primarily as commercial forestry and deciduous forestry as amenity. Proposes some changes to text and that forestry be divided into three sections:</p> <ul style="list-style-type: none"> A. Commercial forestry B. Amenity woodlands C. Provisions dealing with both <p>11. Includes additional proposals for wording for enhancing text around Forestry to provide and protect access etc.</p>	<p>Recommendation: Include an acknowledgement in Section 7.2.4 stating "Farmers are acknowledged as custodians of the natural resources of the countryside and of rural landscapes."</p> <p>9. Section 7.2.4 deals with fencing and constitutes policy as regards fencing in uplands areas and refers to Article 9(l)(A)(X) of the Planning and Development regulations.</p> <p>Agriculture is generally exempt development and hence Development Management Guidance is of limited impact.</p> <p>10. The section in bold is a statement of policy.</p> <p>In many instances coniferous forestry is also used for amenity purposes and deciduous forest for commercial purposes. The promotion of reforestation, sustainable forest management and a diversity of species throughout is promoted by the plan and is considered more important than the categorisation. See Sections 7.4.1 and 7.4.2. in this regard</p> <p>11. The recreational value and opportunities associated with woodlands are acknowledged in the plan. It is considered that the Development Management Requirements in Section 7.5.2 are sufficiently robust. Applications for afforestation is</p>

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	Keep Ireland Open.	<p>12.7.5.2 Extractive Industry should not impact on rights of way and walking routes. Development Management Requirements for Extractive Industry: recommends some changes in text relating to impact mitigation measures, including visual impacts.</p> <p>Chapter 8 Open Space and Recreation</p> <p>13.8.3 Trails, Cycleways, Walkways and Linear Parks. Also dealt with in Chapter 12 Movement and Mobility. Sections should be cross referenced.</p> <p>14.The sentence supporting the promotion of walking trails should be upgraded to a Trails and Walkways Objective</p> <p>15.It is submitted that text be added to reflect the obesity and diabetes crisis.</p> <p>16.8.4 Greenways and Blueways: It is submitted that "Blueways" be deleted from the Title as there is no mention of these in the Text.</p>	<p>considered by Forestry Service in the Dept. of Agriculture Food and Marine.</p> <p>12.The Development Management Requirements in 7.5.2 are adequately robust and protect rights of way in this regard.</p> <p>13.Walking and cycling are pillars of sustainable mobility and is therefore addressed throughout the plan. Cross referencing all references may become excessive.</p> <p>14.This sentence is a statement of policy and does not require changing to an objective.</p> <p>15.This is not recommended as obesity is not a particular focus of the plan but rather general health benefits of regular exercise.</p> <p>16.Recommendation: Include a reference to Blueways in the text as follows: The Council will co operate with other state agencies in the development of Blueways along exiting watercourses as</p>

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	Keep Ireland Open.	<p>17.8.4 - 3rd para 1st sentence 1st phrase it is submitted that this should be replaced by: Develop a strategy to support and underpin funding for the development, extension and enhancement of walking/cycling trails.</p> <p>18.8.4 - 3rd sentence - This should be upgraded to a Trails and Walkways Objective and replaced by: Provide adequate car parking and/or lay-bys for walkers and cyclists at appropriate points to facilitate access to amenity/scenic</p> <p>19.Last sentence should be upgraded to a Trails and Walkways Objective and replaced by: Signpost and waymark walking and cycle routes with appropriately designed quality signage and information boards.</p> <p>20.2nd sentence should be replaced by: Provide, create, promote, plan, support, maintain, enhance, encourage, extend, facilitate and support the development and improvement of walking, rambling and cycling in conjunction/co-operation the Irish Sports Council, walking and cycling groups</p> <p>21.Include a policy to support, promote, facilitate and develop a comprehensive network of greenways, linking parks and public open spaces to the Regional and National</p>	<p>considered appropriate with existing Greenways and Blueways.</p> <p>17.The existing wording to "investigate the potential of an opportunities for the funding of walking and cycling" is considered robust enough.</p> <p>18.Although this is already done, the inclusion of wording is a valid point and provision of car parking facilities should be included in all project proposals.</p> <p>Recommendation: To include in Section 8.4 <i>"The council will consider appropriate car parking facilities in conjunction with the development on amenity areas, amenity cycleways and walkways."</i></p> <p>19.This extent of detail would be in the project plan for the establishment of a particular cycle or walkway and not required at Development Plan level.</p> <p>20.This support for walking and cycling is already expressed in the plan and the Council will work with all groups to enhance, extend exiting routes and create new routes. See Sections 8.3 and 8.4 in this regard.</p>

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	Keep Ireland Open.	<p>Greenway Networks and work with the NTA, adjoining councils and communities.</p> <p>22.8.4.1.2 River Barrow 2nd sentence 1st phrase should be upgraded to a Greenway and Blueway Objective and replaced by: Promote and develop a cycleway along the towpath of the River Barrow and support the amenity and recreational and tourism potential of this Blueway, in co-operation with the NPWS, IW, adjoining Councils</p> <p>23.8.4.3 Developments associated with Water Sports should be repositioned in "Riverside and Water sports Development Management Requirements".</p> <p>24.8.5.1 Accessibility 1st para should be upgraded to a Recreation and Sporting Facilities Objective.</p> <p>25. Section 8.5.1 points should be upgraded to Dev Management Criteria</p> <p>26. Section 8.5.5 Noise Generating Sports - It is recommended that an additional Subsection Recreation with "Recreational Objectives" and Development Management Requirements be included.</p> <p>27. Section 8.6 Public Rights of Way - 1st para 1st sentence should be replaced by: A PROW or highway is a physically defined route over which the public have a right of passage even if the route is not in public ownership</p>	<p>21.Recommendation: Include policy in Section 8.3 of the plan to <i>"Support, promote, facilitate a comprehensive network of greenways, linking parks and public open spaces to the Regional and National Greenway Networks and work with the NTA and adjoining local Authorities and communities in this regard"</i>.</p> <p>22. The tow path is outside the administrative area of the Council. Its development is a matter for Carlow and Kildare County Councils. The current text of the Plan is supportive of developing the Blueway for amenity and recreation.</p> <p>23.Recommendation: Reposition the requirements for Water sports in 8.4.3 to the Section in "Riverside and Water sports Development Management Requirements".</p> <p>24. This is considered a policy Statement</p> <p>25.Recommendation: That the points under 8.5.1 be changed to Development Management Requirements</p> <p>26.Recommendation: That the points under 8.5.5 be changed to Development Management Requirements</p>

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	Keep Ireland Open.	<p>28.Last sentence 1st phrase should be replaced by: This is not an exhaustive/comprehensive list and the omission of a right of way from this list shall not be taken as an indication that such a right of way does not exist.</p> <p>29. Five points are made and it is suggested that a list of public rights of way should be compiled. A modus operandi is set out. The following is requested to be included:</p> <p>30. Public Rights of Way have existed over the centuries and constitute an important recreational amenity. They enable the enjoyment of high-quality landscape, natural and archaeological heritage and provide links to valuable amenities such as rivers lakes, bogs, forests and places of natural beauty.</p> <p>31.The listing and mapping of public rights of way will preserve Public Rights of Ways for recreational purposes.</p> <p>32.Objective 8M – it is suggested it is not too late to include additional public rights of way in the final version of the Plan.</p> <p>33.Additional Objectives are recommended dealing with the safeguarding of existing and establishment of new rights of way.</p> <p>34.Additional Development Management requirements are proposed.</p>	<p>27.Recreation is inherent to the Section and does not require an additional subsection.</p> <p>28.Existing wording is considered correct and robust enough</p> <p>29.Existing wording is considered correct and robust enough</p> <p>30. Public Rights of Way are addressed in Section 8.6 of the Plan. It is considered adequately covered.</p> <p>31.The listing and mapping of Rights of way is already a requirement and included in the plan. The proposed modus operandi will be considered in the expansion of the list.</p> <p>32.Additions of public rights of way at amendment stage could not meet statutory requirements for giving notice to affected land owners.</p>

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	Keep Ireland Open.	<p>Chapter 9: Heritage and Culture</p> <p>35.The identification of heritage trails, including Mass Paths etc. should be considered for inclusion.</p> <p>36.Publish a list with maps of heritage sites which are open to the public.</p> <p>37.Prepare and implement a strategy for access to heritage routes by identifying, promoting and supporting the development of a network of heritage trails,</p> <p>38.The following objective is recommended: "Prepare and implement a Heritage Plan in partnership with the Heritage Forum and all relevant stakeholders."</p> <p>39.Section 7.2.3 Include wording proposed for the protection of commonage.</p> <p>40.Include additional objectives in Section 9.2 to recognise and promote the important role of the environment.</p>	<p>33.It is already an objective to undertake a survey to establish additional existing public rights of way during the lifetime of the plan.</p> <p>34.It is considered that the exiting objectives in Section 8.6 are adequate in this regard.</p> <p>35. The heritage trials and mass paths identification is not a direct function of the Plan. Known rights of way are listed in the Plan.</p> <p>36 & 37. A list of such sites is not considered appropriate in the Development Plan. These can change over time within the lifetime of the Plan and can quickly become out of date.</p> <p>38.The County Kilkenny Heritage Plan and County Kilkenny biodiversity Plan are incorporated in the Kilkenny County Council Cultural Strategy 2018-2022. The Cultural Strategy is due for revision in 2022 and the implementation will be a matter to be agreed with the heritage forum.</p> <p>39.Recommendation: That the following policy be included in Section 7.2.3 dealing with commonage: <i>Preserve the open character of commonage land and other hill land and support access over paths and tracks through consensus with landowners, particularly in mountain areas.</i></p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
	Keep Ireland Open.	<p>1.2.4 Geological Heritage</p> <p>41.Rephrase Development Management Requirements to include "In the interim recognising the importance and geological value of geological sites, work with stakeholders, to protect sites or features of geological or geomorphological interest or importance from inappropriate development".</p> <p>42.Replace and reposition text in a proposed additional Sub Section: Geological Heritage Objectives and replaced by: Promote, encourage, facilitate and support access and public rights of way to geological and geo-morphological features of interest inter in consultation with landowners (where appropriate).</p> <p>9.2.5 Woodlands, Trees and Hedgerows</p>	<p>40.Recommendation: It is recommended that the following policy statements be included in Section 9.2:</p> <p><i>It is the Council's policy to:</i></p> <ul style="list-style-type: none"> • <i>Recognise the important role of the environment through diversity, quality, integrity and quality of life by promoting the protection, conservation and enhancement of the natural environment</i> • <i>Promote appropriate enhancement of the natural environment as an integral part of all development.</i> • <i>Avoid unnecessary harm and reduce its effect where it cannot be avoided though compensatory measures."</i> <p>41.Recommendation: Include text in 9.2.4 to <i>"Promote, encourage, facilitate and support access and public rights of way to geological and geo-morphological features of interest inter in consultation with landowners (where appropriate)."</i></p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
	Keep Ireland Open.	<p>43.Should include Additional Development Management Requirements</p> <p>9.2.6 Inland Waters-Rivers, Streams and Ground Water</p> <p>44.Should include an additional Sub Section: Inland Waters-Rivers, Streams and Ground Water with 10 proposed objectives and 13 Development Management Requirements.</p> <p>45.It is submitted the plan should include an additional policy to recognise the importance of rivers and riparian corridors and buffer zones</p>	<p>43.Recommendation: The proposed text can be included as policy text: <i>"To protecting woodlands and groups of trees from inappropriate development that would impact adversely on them and affect their amenity value."</i></p> <p>44.The proposals focus on access to rivers and riverbanks and the protection of the amenity value of the rivers, including proposals for bylaws to restrict motorised vehicles on rivers. It is considered that the Council will consider these developments and where possible will facilitate access to river banks, subject to limiting inappropriate impacts on Natura 2000 sites. The imposition of bylaws is not a matter for the plan.</p> <p>45. Recommendation: Include reference to the importance of riparian zones in Section 9.2.6 Inland Waters (See submission D236)</p> <p>46.The existing text is considered robust.</p>

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	Keep Ireland Open.	<p>1.2.8 Peatlands</p> <p>46.2nd paragraph should be upgraded to a proposed new Sub Section: Peatlands Objectives. Protect, conserve and manage the character, appearance, heritage and amenity values of peatland landscapes by promoting high environmental standards in conjunction with</p> <p>9.2.12.6 Views and Prospects</p> <p>47.Recommends that some DM standards be amended and additional Development Management Requirements included in Section 9.2.12.6:</p> <p>48.Preserve the status of traditionally open/unfenced landscapes including commonages and other hill land.</p> <p>49.Adopt a regional approach to the protection of the landscape in co-operation with neighbouring counties.</p> <p>50.The submission proposes additional Sub Section: Landscape Objective and requires that the plan provide and increase managed public access to interesting and attractive landscapes or to semi-natural and landscape amenity areas for recreational purposes.</p> <p>9.3.1.1 Archaeological Landscapes</p> <p>51.9C submit that this should be replaced by: Council recognises the importance of promoting, encouraging</p>	<p>47.The existing Development Management Requirements are considered robust.</p> <p>48.The status of these open landscapes is protected in the Current development Management Standards in Section 9.2.12.6. The existing text is considered robust enough.</p> <p>50.The plan already includes adequate provision for access to landscapes by virtue of the proposed policy objectives included in the plan and proposed in this report.</p> <p>51.The current text in Objective 9C is robust enough to ensure the protection of Archaeological sites and monuments.</p> <p>52.Recommendation: That a policy statement be included in Section 9.3.1 that promote / encourage and protect public</p>

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	Keep Ireland Open.	<p>and securing/ensuring the protection, conservation, preservation, enhancement, safeguarding and appropriate management of sites, structures settings and features of archaeological/historic interest, archaeology and archaeological objects or zones of archaeological potential...</p> <p>52.Objectives 9D & E should include additional Objectives:</p> <ul style="list-style-type: none"> • Recognising the importance of archaeology and National Monuments as part of our heritage, promote, enhance, facilitate, encourage, support, improve and protect public access • Promote, provide and encourage signage to archaeological sites and National Monuments listed in the RMP. • Traditional access routes will be designated as public rights of way. <p>Development Management Requirements:</p> <p>53.1st pt 1st phrase should be replaced by: Endeavour to protect and secure the preservation in situ of all archaeological remains and sites of historic importance such as National Monuments, Recorded Monuments, their settings, caves, features and context</p> <p>54.Protect and preserve in situ all archaeological sites and features of historic interest discovered/identified subsequent to the publication of the RMP.</p>	<p>access to Archaeological Heritage Sites and encourage signage to Archaeological sites and National Monuments.</p> <p>53. The existing text of the Development Management Requirements is considered robust–</p> <p>54. Objective 9C addresses this issue.</p> <p>55.The existing text is considered robust for protecting and conserving graveyards and does not need replacement.</p> <p>56. Heritage items are given protection under the general heritage policies for architecture and archaeological policies</p> <p>57.The Grid Development Management Requirements in Section 10.3.2 and Development Management Requirements throughout the plan, including Chapter 9 generally and in particular under Section 9.2.12.6 already considers views and</p>

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	Keep Ireland Open.	<p>9.3.1.6 Historic Graveyards 55.Text to be replaced by: Protect, preserve, enhance, conserve and maintain archaeological/historic graveyards and their settings and historic burial grounds(including those identified in the RPM) and those in the guardianship of the Council through improved access and preserve their heritage value</p> <p>9.3.3 Architectural Conservation Areas 56.Include text to preserve, protect and, where necessary, enhance mass rocks and holy wells.</p> <p>Chapter 10 Infrastructure: 57.Grid Development Management Requirements should be replaced by: As overhead powerlines and television cables can have an adverse/ negative impact on the natural environment, ensure that they are designed to have regard to possible interference with or damage to heritage sites, areas of archaeological importance, pNHAs, cSACs, SPAs or sites of nature conservation. Minimise their obstructive impact, their obtrusiveness and their visual intrusiveness particularly in mountains areas, by their being integrated with their surroundings.</p>	<p>prospects, Archaeology, Built Heritage and the Environment. All applications are subject to the assessment of potential impacts under the Habitats Directive to consider impacts on Natura 2000 sites. These considerations, separately and in combination, will ensure that visual obtrusiveness is addressed and integration with surroundings is achieved.</p> <p>58.The impact of the transmission lines will be assessed and options such as undergrounding will be considered in accordance with existing Development Management Requirements. See above.</p> <p>59.Recommendation: That a Development Management requirement be included that, "where considered necessary by the Council, a Visual Impact Assessment and a Landscape Impact Assessment will be required under Section 10.3.2 for significant Grid Infrastructural projects."</p> <p>60.The Development Management Requirements in Section 10.3.2 already apply. Where a visual impact assessment is undertaken and undue impact is expected, alternative alignments should be considered to mitigate the visual impact.</p>

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	Keep Ireland Open.	<p>58.Recommends requirement for the undergrounding or re-routing of transmission lines (including telephone and TV cables) shall be considered first as part of a detailed consideration and evaluation of all available options.</p> <p>59.Additional Development Management Requirements:</p> <ul style="list-style-type: none"> • 1 A Visual Impact Assessment shall be submitted. • 2 A Landscape Impact Assessment shall be submitted where a proposed development is located in lands in high amenity and mountain areas <p>60.Should include an additional Sub Section: Grid Objective: The Council should ensure that transmission lines are located in non-scenic areas, where possible, thereby avoiding landscapes of high value or sensitivity, areas of nature conservation and archaeological interest so that that the visual impact is minimised.</p> <p>10.4.1.4 Telecommunication Antennae</p> <p>61.Objectives 10J should include an additional Objectives: Require the identification of Public Rights of Way and established walking routes prior to any new telecommunication developments (including associated processes) which will be prohibited if they impinge or</p>	<p>61.The plan already protects Rights of way. Walking routes may be redirected so prohibition of development may not be justified. See Objective 8N and Section 8.6.1 in this regard. It is considered that existing text is robust enough.</p> <p>62.The Wind Energy Strategy considers landscape impact, but all applications for renewable energy will be subject to relevant Development Management requirements, including visual impact, landscape impact, human Impact and infrastructure impact assessment. See section 11.5.3 in this regard. Significant applications are subject to full Environmental Impact Assessment Reports (EIAR).</p>

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	Keep Ireland Open.	<p>impact thereon or on recreational amenities or public access to the countryside or on the natural environment.</p> <p>Chapter 11 Renewable Energy</p> <p>62.The following Development Management Requirements should be included:</p> <ul style="list-style-type: none"> • Developments must be appropriately/suitably located. • Should not create a nuisance or impact scenic landscapes • In assessing development proposals the Council will consider/take cognisance of public access to the countryside and the impact on public rights of way and walking routes. <p>11.5.3 Development Management Guidance</p> <p>63.The council should restrict large scale wind energy structures in the rural hinterland and mountain areas</p> <p>11.8.5 Solar Energy Development Management Guidance</p> <p>64.11.8.5.1 Utility Scale Solar PV(USPPV1) should include an additional point to safeguard and protect the natural heritage and must have no significant adverse impact on the surrounding natural environment and amenities or sensitive areas such as Natura 2000 sites.</p> <p>12.5 Cycling and Walking</p>	<p>63.The Wind Energy Strategy assessed the suitability of the landscape for large scale wind energy projects and designated the landscape accordingly.</p> <p>64.The Development Managements Requirements in Section 11.8.5 and 8.8.5.1 are considered adequate and robust enough to address issues of landscape impact and</p> <p>65."The identification of Way marked Ways is not a function of the Development Plan..</p> <p>66. Walking as a means of sustainable transport is provided for in the mobility policies and modal shift targets for the county. In a recreational sense walking is provided for</p>

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	Keep Ireland Open.	<p>65.Walking: Should include a Table of Way-marked Ways and other defined walking trails</p> <p>66.Include a set of Walking Objectives.</p> <p>67.Cycling: should include a Table of Cycle routes with maps.</p> <p>68.Include additional objectives dealing with the promotion of an integrated coherent network of safe cycle routes in accordance with best practice, lower speed limits, cycling priority, National Cycle Network Scoping Study 2010, co-operation with Sports Council, NTA, Production of cycle maps, community, authority or agency led projects, continuous and safe paths, interlinked cycleways, car parking for walkers and cyclists, funding for the development and protection of routes and potential linkages, quiet routes, linear paths footpaths trails, greenways and cycleways.</p>	<p>through the tourism policy and objectives and also through the rights of way policy and objectives</p> <p>67.Cycling routes identification and promotion is not a function of the Development Plan. During the course of the Plan additional routes maybe added and deleted which makes the Pla an unreliable source of such information.</p> <p>68.The Cycling Strategy for the County will include all aspects of the compliance with national guidance and will consult with all appropriate statutory bodies and stakeholders and will deal with network issues, paths and linkages.</p>

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	Keep Ireland Open.		
KK-C162-67	Trustees of St. Kierans College	1.The trustees wish to commend the positive planning objectives for St. Kierans College contained in the Draft Plan and ask that they be included in the adopted City & County Development Plan.	1.Noted
KK-C162-68	Leo and Kay Cody	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KK-C162-69	Edmond Cody	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KK-C162-70	SLR Consulting on behalf of Roadstone Ltd	1.It should be the aim of the proposed CDP to safeguard areas of significant resources from incompatible developments to ensure the continued viability of the extractive industry whilst ensuring that environmental, rural, scenic and residential amenities are protected.	1.The draft plan states that it is important to facilitate development with due regard to mineral reserves to ensure that inappropriate development does not impinge on the viable exploitation of a resource. The plan does mitigate against impacts on the environment and amenity of the

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		<p>2.Chapter 5 has no reference to the extractive industry, nor its potential socio-economic benefits detailed within the chapter.</p> <p>3.Non-extractive industry related development may be restricted in areas in close proximity to existing extractive sites of significant resource potential where such developments would limit future exploitation</p> <p>4.Planning authorities should adopt a systematic approach for safeguarding mineral resources, based on best available information on the location of all mineral (aggregate) resources, consultation with the extractive industry, local communities and other relevant interests, setting out Minerals Safeguarding Areas on the policies map and adopting clear development management policies.</p> <p>5.Plan should highlight areas containing proven deposits on an appropriate map informed by the noted Aggregate Potential Mapping (AGP) as carried out by the GSI.</p> <p>6.The submission attaches the document "Essential Aggregates, providing for Irelands Needs to 2040" for consideration.</p>	<p>affected areas and Development Management Requirements in 7.5.2 refer.</p> <p>2.Economic contribution of aggregate industry in acknowledged in Section 7.5</p> <p>3. Recommendation</p> <p>Insert the following statement at the end of Section 7.5.1.</p> <p><i>The Council will have regard to the aggregate potential mapping within the County in assessing applications for non extractive industry related in areas in close proximity to existing sites or significant resource potential where such development would limit future exploitation</i></p> <p>4.Section 7.5.1 safeguards mineral reserves and ensures that inappropriate development does not impact on the viable exploitation of resources.</p> <p>5.Aggregate Potential mapping is also referenced in this section.</p>

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			6. Noted
KK-C162-71	<p>Brock McClure on behalf of IMC Cinema Group</p> <p>Brock McClure on behalf of IMC Cinema Group</p>	<p>1. The landowner welcomes the requirement for a masterplan and states a specific development objective to prioritise the regeneration of this site should be included in the new plan.</p> <p>2. Zoning objective should allow the masterplan to be developer led, consistent with the Planning Authority's own strategic requirements for enhancing the quality of life on offer in Kilkenny City.</p> <p>3. The situation can arise that not enough land comes forward for development in a timely manner to satisfy the 30% infill requirement in the City. Strategically located sites that will offer central housing in a sustainable neighbourhood setting with easy access to other services and amenities will be vital in this regard.</p> <p>4. It is submitted that the former Mart Site should be included within "Retail Phase 1" on an equal footing with MacDonagh Junction.</p> <p>5. Abbey Quarter is within Local Authority control and this site should not be given competitive advantage in the policies and objectives of the new City Plan.</p> <p>6. The submission gives some historic context in terms of previous and current Development plans and the priority for the site in terms of these. The context also explores previous</p>	<p>1. Masterplan to be completed within timeframe of the plan. Abbey Quarter has not progressed significantly. Of the potential 50,000m² of development 8,200 m² currently under development no other commitments to date.</p> <p>2. Development not based on arbitrary timelines but based on sequential of development.</p> <p>3. Abbey Quarter not singled out because of ownership. Sequentially it is the most preferable location for development in terms of achieving compact growth.</p> <p>4. The Mart site is appropriate for a mixture of retail, commercial, residential and public realm upgrades to provide for the sustainable expansion of the City Centre in a compact growth setting. This split between various land uses needs the production of the masterplan with the particular reference to scale of retail which would be appropriate to the site having regard to the retail core and areas adjacent to the core such as Johns Street McDonagh junction, Parliament St Dean St, Patrick St, the Abbey Quarter, etc.</p>

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	Brock McClure on behalf of IMC Cinema Group.	<p>Housing projections in terms of the RPS and states the land is phase 1 land.</p> <p>7.The submission outlines the planning history for the Abbey Quarter, MacDonagh Junction and the Mart Site as well as the provisions of the current draft plan relating to the Mart Site, including Retail Policy 14, Chapter 5, Volume 1.</p> <p>8.Submission supports the "General business Zoning".</p> <p>9.The subject site is appropriate for the provision of an expanded range of uses including housing and retail that would benefit from a City Centre location and promote compact growth objectives and is more appropriate to a mixed-use development that would enhance and complement the town centre. The landowner can progress a suitable Masterplan for this site and identify the area as an integrated City Centre Neighbourhood within Kilkenny Urban Core.</p> <p>10.This submission promotes the subject site as an appropriate "Retail Phase 1" site and states it is well placed to provide residential accommodation generation and a retail/commercial element given the projected levels of population growth and the limited availability of lands within the City area, particularly in locations close to complementary services and within walking distance of the core retail area.</p>	<p>There is no objection to the masterplan being developed and/or led by the developer of the site. This however must be done in conjunction with the Local Authority.</p> <p>Recommendation: Change wording of objective CE2 from: C2E Develop a masterplan for the former Mart (Ref Z10) site to deal inter alia with the mix of uses, movement, public realm, design, building heights etc.</p> <p>To: <i>CE2 Develop a masterplan for the former Mart (Ref Z10) site either by the Developr or jointly between the Planning Authority and the developer to deal inter alia with the mix of uses, phasing of development, movement, public realm, design, building heights etc</i></p>

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	Brock McClure on behalf of IMC Cinema Group.	<ol style="list-style-type: none"> 1. Submission outlines National and Regional policies related to Compact growth. Plan outlines projected growth and new Section 28 ESRI projections and states further strategy is required for a situation where New Residential lands do not provide adequate headroom for population expansion or cannot come forward for development due to inability to provide adequate infrastructure. The draft should provide a mix of residential, retail and commercial land uses. 2. The submission states that the plan should provide for regional in-migration and that a meaningful policy on remote working should be included in the draft Plan. 3. The Development of the Mart site would support a number of the Retail Objectives in the draft plan and provide a critical mass of population with the City Centre by providing residential land supply and promoting Kilkenny City as the prime retail centre within the County. The Former Mart Site should be elevated to "Retail Phase 1" given it is equidistant to MacDonagh junction from the City centre and is development ready and ideally located in proximity to Kilkenny City Centre. The Abbey Quarter should 	

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		<p>not be elevated in priority above other available sites.</p> <p>4. The submission proposes a number of changes in the text of the plan including Objective 10 "The Masterplan for the site may be landowner led or Local Authority led or a mixture of both depending on available resources" and Retail Policy 14 by removing it from Retail phase 2 and removing "convenience and comparison retailing" as appropriate uses from the Abbey Quarter.</p>	
KK-C162-72	Peter Thomson on behalf of Michael and Sheila Foley	<p>1.Submission seeks either an amendment to the proposed zoning lands at Poulgour (Parcel J) or a statement in the text of the draft Plan regulating how the land can be developed. Submissions requests that a strip of open space zoning be incorporated into the zoning map to distance their home from what will inevitably be high-density housing or a requirement be inserted for parcel J, stipulating that any housing located to the north of the Village Centre zoning is a minimum of 15m from the boundary between the residential and village centre zoning.</p> <p>2.Parcel L seems to have been left out of the draft Plan despite there clearly been significant advances towards its development since 2017. It is considered further consultation and opportunity to comment on the plans for</p>	<p>1.In the 2004 Local Area Plan a statement is included into the written statement which seeks to ameliorate the impact of the new developments on existing developments in the area. The LAP has been incorporated into subsequent Development Plans maintaining the principles in the Plan with adjustments to detail as necessary. Reducing sever negative impact on existing developments in the area is contained in the original LAP.</p> <p>2.A statement will be included in section 2.2.3 relating to the protection of residential amenity in the Breagagh Valley. Parcel L will be included in the Draft setting out the requirements for development within the Parcel.</p>

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		Parcel L need to be facilitated before any amendments are considered to the draft Plan.	<p>Recommendation:</p> <p>Include the following text in 2.2.3 as follows:</p> <p>Particular care must be taken to ensure that the amenity of existing residential development in the plan area is not compromised. Generally new housing should be set back a minimum 15m from the boundary of all housing within the plan area existing at the time of the adoption of this plan. A balance must be found between protecting the amenities of existing properties and the creation of new urban forms. Where new developments adjoin existing residences the use of screen planting and/or walling in combination suitably design buildings will ensure that impact on existing residences are minimised.</p> <p>Include in Table 2.3 Block L , M & K requirements.</p>
KK-C162-73	Peter Thomson on behalf of St. Johns School	<p>1.Submission outlines the position at St. John Junior (Michael Street) and Senior (Ballybought Street) schools. The Model School (close to Kilkenny College) and Johnswell National School at Johnswell.</p> <p>2.Both St. John's Junior and Senior Schools are at capacity and functioning with temporary classroom accommodation. It is estimated that around 1000 children resident to the east of the city in St. John's Parish are attending existing primary schools to the west of the city. Focus of the plan is on the West and the draft Plan does not look backwards and identify the issue to the east of the city regarding primary</p>	<p>1.During the 70's 80's 90's & 00's the focus on expansion of the City was in southern and eastern quadrants of the City. Since then the focus for expansion has shifted to the western side of the City (Breaghagh Valley & Loughmacask). Places & population in the east?</p> <p>The Council consult with the Dept of Education in accordance with agreed protocols in relation to provision of school places.</p> <p>The draft plan has the following policy:</p> <p><i>The Council will continue to liaise with the Department of Education and Skills, and all providers of education, to</i></p>

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		<p>school provision being at capacity and significant numbers of children travelling across the city to obtain a primary school.</p> <p>3.Sites currently under development and windfall sites in the East will lead to increased demand.</p> <p>4.To satisfy the current and draft Plan "The 10-Minute City Concept", the Newpark Upper/ Eastern Environs neighbourhood should have sufficient primary school places existing or proposed within a ten-minute walk, and the existing and proposed primary schools on the west of the city cannot satisfy this requirement.</p> <p>5.The Plan should also reflect the shortfall in primary school places that exist to the east of the city and consider the primary school accommodation needs of the existing and proposed population in the Newpark Upper/ Eastern Environs neighbourhood and wider St John's Parish.</p> <p>6.It is requested that the list of uses open to consideration during the lifetime of the Development Plan for Strategic Reserve zoning be extended to include "schools".</p>	<p><i>assist in the development of adequate education centres, and to identify and facilitate the provision of suitable sites for new educational facilities as the need arises throughout the City.</i></p> <p>This is considered sufficient to address the concerns raised by the submission.</p> <p>Recommendation: No Change</p>
KK-C162-74	Dicksboro Camogie Club	<p>1.The continuous growth of the Camogie club has put the exiting playing facilities under pressure. The club wishes to develop partnerships with the three proposed schools in the Western Environs and requires full sized pitches of 90mX145m to accommodate both the adults and growing numbers of juveniles. It is requested that provision be made</p>	<p>1.The Club's aspirations for growth and access to playing pitches in the Breaghagh Valley, formerly referred to as the Western Environs, is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breaghagh Valley. These Amenity lands will be extensive enough to accommodate playing pitches and</p>

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		for an appropriate number of pitches adjacent to the new schools.	<p>although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p> <p>Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breagagh valley.</p>
KK-C162-75	Newpark AFC	<p>1.Submission proposes development of full-sized sports fields in conjunction with the new school (sic).</p> <p>2.The club has 2 men's and 1 ladies' team and has a lack of facilities and playing space (one pitch also used by the community), so cannot accommodate youth teams. Pitch could not take previous number of teams.</p>	<p>1.The Club's aspirations for growth and access to playing pitches in the Breagagh Valley, formerly referred to as the Western Environs, is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breagagh Valley.</p> <p>These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p> <p>Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breagagh valley.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-162-76	Feargall Kenny on behalf of Michael Angim	<p>1.The subject site at Clashacollare is ready to accommodate a sustainable high-class residential development geared to the requirements of Development Plan objectives.</p> <p>2.The submission urges the Planning Authority to restore the residential zoning to these lands in order to help meet the population and housing requirements projected for Callan over the period of the proposed City and County Development Plan 2021 –2027.</p> <p>3.The submission states that Civil works, including foul and surface water sewerage, watermains, utility services ducting and road pavement build-up to binder course level, were constructed in accordance with a masterplan at the site in Clashacollare circa 2005/2006. The land has since been de-zoned.</p> <p>4.The submission indicates the availability of water and wastewater infrastructure and that minimal works will be required to bring services, roads and utilities into use.</p> <p>5.A Flood Risk Assessment accompanies the submission.</p> <p>6.Re-zoning of the subject site to 'residential use' would be an appropriate and sustainable use of the subject site.</p> <p>7.The additional population allowance in the draft plan over and above the 2019 LAP projection will require an increase in the lands zoned for residential use.</p>	<p>In the draft plan additional housing capacity has been allocated to Callan. This will require a review of the core strategy and an analysis of the lands identified for housing.</p> <p>It is appropriate that any amendment to the zoning of the lands be carried out through a separate amendment of the LAP.</p> <p>This will be carried out in a timely manner following the adoption of the City & County Plan.</p> <p>Recommendation: No Change</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-77	Feargall Kenny on behalf of Michael Angim	<p>1.The submission relates to a 2.8 ha site at The Green, Jerpoint West, Thomastown. part of a larger holding totalling 5.74, the remainder of which has been developed.</p> <p>2.The additional population allowance will require an increase in the lands zoned for residential use over and above that shown on the zoning map of the adopted Thomastown LAP 2019 and the subject site at The Greens is eminently suitable to contribute to this programme.</p> <p>3.The site is easily connected to all services</p> <p>4.This site should be rezoned for residential development so as to allow the completion of their development for housing as originally envisaged.</p> <p>5.The submission urges the Planning Authority to restore the residential zoning to these lands in order to help meet the population and housing requirements projected for Thomastown over the period of the proposed City and County Development Plan 2021 –2027.</p>	<p>In the draft plan additional housing capacity has been allocated to Thomastown. This will require a review of the core strategy and an analysis of the lands identified for housing.</p> <p>It is appropriate that any amendment to the zoning of the lands be carried out through a separate amendment of the LAP.</p> <p>This will be carried out in a timely manner following the adoption of the City & County Plan.</p> <p>Recommendation: No Change</p>
KK-C162-78	ARUP	<p>1.Plan should highlight the strategic importance of the N24 corridor to the Southern Region's transport network and acknowledgement of same within the policies and objectives of the new City and County Development Plan.</p> <p>2.The submission requests that the promotion of regional accessibility is given more emphasis in the Plan with a specific policy objective to reinforce same. In addition, the strategic aim for the 'Movement and Mobility' strategy</p>	<p>Recommendation: The following wording to be included at the top of section 12.11.6 <i>"National Roads projects such as the N24 are of strategic importance to facilitate inter- and intraregional accessibility and the Council, with the support of Transport Infrastructure Ireland (TII), supports and is progressing/developing a number of schemes within County Kilkenny as follows:"</i></p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		could reference the facilitation and enhancement of regional accessibility.	
KK-C162-79	Mairead Sheehan	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-80	Teresa and John Sheehan	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-81	Ann Kenny	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-82	Paul Ryan	Rath Ullard	See submission ref. KK-C162-60
KK-C162-83	Seamus Norris	<p>This submission relates to the N24 and to the Wind Energy strategy.</p> <p>1.To prevent death and injury, the plan must cater as a matter of urgency for road improvements on N24 at Piltown including:</p> <ul style="list-style-type: none"> • Implementation of the planned development at the Tower Road Junction as a matter of urgency • Resolution and elimination of All right hand turns to exit N24 from Clonmore to Three Bridges/Garnarea <p>2.This relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.</p>	<p>1.Kilkenny County Council are currently preparing tender documents for the N24 Tower road safety scheme. It is envisaged the works will start in late 2021. In relation to the right turning movements on the N24, Kilkenny County Council are currently working on the Waterford to Cahir scheme which will consider the concerns of safety and right turning movements along the entire route of the N24.</p> <p>2.See discussion under Section 3.1 Lingaun Valley.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-84	Eileen Grace	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-85	Nicola Cummins	See submission ref. KK-C162-23	
KK-C162-86	Andrew Fitzsimons	1.This submission relates to the Wind Energy Strategy and Kilkenny Airport. Submission outlines history and current activities at Kilkenny airport including parachute and flying clubs, private domestic and international flights and the benefits to the local community. 2.Submission is concerned of possible collision risk of planes with any proposed turbines, as in the Wind Energy Strategy a large area of "Acceptable in Principle" zone is to be located c.6km due west of the airport. The submission seeks that wind turbines be set back at least 7km -15km from the airstrip so as to avoid a collision with a wind turbine.	1.Noticed. 2.As set out in Vol. 1, Chapter 11, Section 11.5.3.10 Interference with Communication Systems, applicants for wind farms are required to make contact with the Irish Aviation Authority in advance of any proposed application. The IAA promotes and regulates the safety of aviation in Ireland.
KK-C162-87	Marilyn Young	See submission ref. KK-C162-23	
KK-C162-88	Peter Thomson on behalf of Sean McMullan	1.Submission relates to small piece of land on Canal Walk, zoned "amenity/ green links/ biodiversity conservation/ open space/ recreation" in the draft plan, changing from the current zoning for a mix of "residential" and "amenity/ green links and biodiversity". It is requested that the "residential" zoning be reinstated.	1.A site-specific flood risk assessment was submitted under 14/589 and shows the site to be located in flood zone A, with the 1/100-year flood zone (B) at 41.650 and the 1/1000-year flood zone (A) at 42.450. The Site-Specific Flood Risk Assessment determined the site to be at risk from 1/1000-year flood and hence the finished floor level of the house needs to be raised to 42.475a OD Malin as per Permission

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>2.The site has an extensive planning history, including houses for which large expenditure has been incurred readying the site. The raising of ground levels in accordance with the permission granted by 17/365 takes the finished floor level of the house above the 1/1000 flood level. Permission expired in 2020 and a new application is required. The rezoning of the site as proposed will not allow application for permission.</p> <p>3.The site is securely enclosed behind existing walls along the north and western boundaries and further screened from Canal Walk by mature trees and hedges.</p>	<p>17/365, now expired. Residential remains a highly vulnerable use. Flood Risk Assessment precludes the consideration of mitigation measures in the determination of flood risk.</p> <p>Recommendation: No change</p>
KK-C162-89	Shane Campion	Rath Ullard	See submission ref. KK-C162-60
KK-C162-90	James & Nancy Hearne	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-91	Alice Aylward	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-92	Canice Coogan	Rath Ullard	See submission ref. KK-C162-60
KK-C162-93	Brian Malone	Rath ullard	See submission ref. KK-C162-60
KK-C162-94	Robert Power	1.This submission relates to the Wind Energy strategy, and states he would not like wind turbines in his area, however the area is not defined.	1.The Draft Plan sets out a Wind Energy Strategy that is in line with Government policy on Wind Energy Developments

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			as set out in the <i>Wind Energy Development Guidelines</i> ²⁰ . Every application for a wind energy development is assessed against the relevant development management standards in relation to its impacts, including impacts on adjoining properties. There are substantial changes to the Wind Energy Strategy, see Section 3.1 Lingaun Valley and 3.2 Castlebanny.
KK-C162-95	Lena Power	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-96	Brendan Aylward	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-97	Maurice Murphy	Rath Ullard	See submission ref. KK-C162-60
KK-C162-98	Freida Campion	Rath Ullard	See submission ref. KK-C162-60
KK-C162-99	Shane Aylward	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-100	Breda Murphy	Rath Ullard	See submission ref. KK-C162-60
KK-C162-101	John O' Mahoney	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.

²⁰ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-102	Kelly Allen	Rath Ullard	See submission ref. KK-C162-60
KK-C162-103	Pol Brennan	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-104	Robert Aylward	This submission relates to the Wind Energy strategy. 1.The submission contends that the Wind Energy Strategy contains very limited and vague information on the maximum height of wind turbines or the distance they are required to be from existing dwellings. 2.See discussion under Section 3.2 Castlebanny.	1.The Draft Wind Strategy is contained in Appendix K to the Plan, and specific requirements for wind energy developments are set out in Vol. 1, Chapter 11, Renewable Energy. Section 11.5.3.11 <i>Appropriate Setback Distances to apply</i> , details the setback requirements. 2.See discussion under Section 3.2 Castlebanny.
KK-C162-105	Alex Wilsdon Jnr	1.The submission relates to two parcels of land, one to the North (A) and one to the South (B) of the Sion Road. The submissions states that there are areas of the city where low density development is the only suitable option due to the accepted requirement to preserve the existing low-density residential amenity. While it is acknowledged that national policy is for higher density, the demand remains for larger homes on their own grounds. 2.It is proposed that the lands A to the north of the Sion Road be now zoned "Existing Low Density Residential" at 10 units per ha to facilitate the development of these lands. 3.Lands B to the south of the Sion road are currently inside the CSO boundary, but outside the development boundary. It is recommended that this boundary be realigned with the	The lands are located along the Sion Road. Parcel A is 3.5 ha and parcel B is 1.15 ha The sewer wayleave is shown below. The lands are on the periphery of the built-up area of the City. The area is characterised by low density housing at present with permission extant for low density housing 31 of which currently under construction planning ref 19/242. Permission also exists for 12 large sites under ref 19/706 and also 19 sites under outline permission 14/586. Given the number of permissions extant, the planning history and the extent and character of the existing residential zoning in the area and the policy in the draft plan encouraging appropriate infill and back land development and the objectives of the core strategy these lands are not required to

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>CSO boundary and the land be zoned "Existing low density residential.</p> <p>4.The availability of services on site and the location contiguous to existing residential development means the land meets the criteria for "Tier 1 Serviced land" as described in Appendix 3 of the NPF2040.</p>	<p>fulfill anticipated housing demand. The addition of these land would result in a further uncoordinated expansion of the built-up area in an area where there is ample provision of low-density housing.</p> <p>It is also noted that the sites are within 100 and 80 metres of the WWTP respectively.</p> <p>Recommendation: No Change</p>
KK-C162-106	Seskin Wind Farm (Paul Murphy, John Holohan, Tim Sherman and PJ Murphy)	<p>This submission relates to the Wind Energy strategy and:</p> <ol style="list-style-type: none"> 1. Requests that the Draft Wind Strategy Areas Map be amended to include an area at Seskin, Ballyragget in the Acceptable in Principle classification area, as: <ul style="list-style-type: none"> • The area complies with the Guideline requirements and is suitable in terms of windspeed, access, separation distance from residences and grid connections, • The area is not located within an SAC, NHA or SPA designated area, or in a Special or sensitive area, • ground stability conditions will not be a significant issue and • Funding from a windfarm project in this area would be very beneficial to the community living in the Lisdowney area. 	<p>The Draft Wind Energy Strategy as set out in Appendix K took a strategic approach to the designation of areas for large scale wind energy developments. The first step was the identification of areas of wind speed of 7.5m at 75m above ground level, which was reduced from 8m/s in the previous strategy). The reasons for selection of this criterion were threefold: this allowed for a greater range of areas to be examined in line with national targets, this reflects advances in turbine technology, and was consistent with two adjoining counties of Laois and Wexford. The area subject to the submission has wind speeds of 7.4m/s at 75m height which falls just short of the cut-off for the Draft Strategy. The area is however designated as Open for Consideration, within which small scale or community led initiatives would be considered.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-107	Mary Molloy	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-108 KK-C162-112 KK-C162-444	Liam Scott and Pauline Egan on behalf of Kilkenny & Carlow Ed and Training Board Kilkenny City Vocational School Eileen Curtis, Kilkenny and Carlow Education and Training Board	<p>Request No. 1: Provision of suitable sport pitches</p> <p>1.KCETB will provide a significant number of sporting and recreational facilities in the new schools campus in the Western Environs but Dept. of Education will not be providing sport pitches. The provision of full-sized multi-use playing pitches, as part of recreation and amenity infrastructure, is very important for wellbeing, quality of life and identity in the new community in the Western Environs. A full-sized multi-use grass or synthetic based playing pitch would be 90 metres * 145 metres in size, and allow schools and sporting clubs play official competitive matches. A sustainable level of sporting infrastructure can be provided in the Western Environs through the auspices of KCETB schools, Kilkenny County Council and other stakeholders.</p> <p>Request No. 2: The playing pitches to be located adjacent to the three new schools</p> <p>2.KCETB requests that such facilities be provided adjacent to the three schools to enhance the health and safety of the student body of children and young adults aged 5-19.</p> <p>Request No. 3 The provision of safe walking and cycling infrastructure</p>	<p>1.The KCETB request for playing pitches close to the proposed schools campus is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breagagh Valley. These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p> <p>Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breagagh valley.</p> <p>2.The major parks are shown in the figure CS4 of the plan. In accordance with the Breagagh Valley Plan, the pitches can be located close to the school but will not be directly adjacent.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		3.KCETB requests that a network of segregated cycle tracks, i.e. a web of interconnected cycle routes that are physically separated from motor traffic by kerbs, bollards or other appropriate structures be created for the Western Environs.	3.As part of the Rollout of the Breagh Valley Plan, sustainable walking and cycling infrastructure will be required to form part of any planning proposal and will be informed by the Walking and Cycling plans for the city. Also see objectives 12 I and 12J in this regard.
KK-C162-109	Noel O'Keefe	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-110	Seamus Phelan	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-111	Willie and Rhona Dempsey	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-112	Kilkenny City Vocational School	See submission ref. KK-C162-108	
KK-C162-113	James Thompson	Rath Ullard	See submission ref. KK-C162-60
KK-C162-114	Tom Keogh	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-115	Philip Brennan	1.Notwithstanding its history and the fact that the Defence Forces in Kilkenny City are one of the biggest employers in the city, county and the South East and significant	1.James Stephens Barracks fall directly under the Department of Defence and as such is not subject to Development Oversight by Kilkenny County Council. It does however play

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		contributors to emergency management and response, it appears, no mention is made anywhere in document of the presence of the 3rd Infantry Battalion of the Defence Forces and James Stephens Barracks.	a significant role in the Economy of the City and should be acknowledged in the Plan. Recommendation: That the following text be included in Section 1.6 of the Plan <i>"The significant contribution of the presence of the 3rd Infantry Battalion of the Defence Forces and James Stephens Barracks to the local economy by means of employment and emergency management and response is acknowledged."</i>
KK-C162-116	Francis O' Mahoney	Rath Ullard	See submission ref. KK-C162-60
KK-C162-117	Orla Skehan	Rath Ullard	See submission ref. KK-C162-60
KK-C162-118	Jean Strong on behalf of Whisperview Trading & Carriganog Racing	1.Submission sets out that they operate a number of significant equine facilities in the Lingaun Valley area which are of critical and systemic importance to the local rural economy and social structure. 2.See discussion under Section 3.1 Lingaun Valley. 3.Outlines aspects of wind energy developments which are a risk to safety of horses and personnel, and outlines the potential effects of renewable energy developments on the image and setting of equine establishments. The submission seeks the inclusion of a policy to require a detailed assessment of potential impacts of all renewable energy, particularly wind energy developments on all equine facilities within a 5 km radius of the application site	1.Noted. Section 7.2.5 of the Draft Development Plan recognises the role and importance of the equine industry and in particular the breeding, rearing and training of thoroughbred horses and seeks to support the improvement and expansion of the equine industry within the county. 2.See discussion under Section 3.1 Lingaun Valley. 3.Chapter 11 sets out the development management requirements for all renewable energy developments. This includes reference to stud farms in Section 11.5.3.6 Natural Heritage, where it is stated that <i>"the provisions of the Guidelines in relation to noise and flicker will apply to registered thoroughbred stud farms"</i> . All other renewable energy developments must also satisfy development management standards in relation to effects on adjoining

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		boundaries and that any proposed development that has the potential to adversely impact the industry or the perception of the industry, will not be permitted.	properties. A new section will be included in Chapter 11 entitled "Effects on Equine Facilities". This will include a Development management standard as follows that <i>"applications for wind energy developments shall be accompanied by an assessment detailing potential impacts, mitigation and residual impacts upon the equine industry. Such assessments shall also consider issues including noise and shadow flicker"</i> . See submission KK-C162-236
KK-C162-119	MJBE Investments 3 Limited	<p>1.Submission welcomes the continued support outlined in the Draft Development Plan for the development of Mount Juliet Estate as a leading tourism, sporting and leisure destination and for the further development of residential accommodation within the Estate.</p> <p>2.The submission requests that Map Ref. 8 and 12 are removed from the action plan for Mount Juliet Estate, with the existing maintenance yard to be relocated to accommodate 9 No. units (8 No. 2 bed apartments and 1 No. 3 bed house).</p> <p>3.It is also requested to include an objective to extent the car par at the Hunters Yards to provide more parking for the hotel.</p>	<p>1.The content of the submission seeks the deletion of objective 8 and 12 from the Figure 5.1 and Table 5.2 which provide for additional lodges at the Rose Garden and 9 houses at the Kennels with no further development at those locations and to replace these with objectives with the following:</p> <p>2.Provide for the relocation of the existing maintenance yard, Provide for the development of the existing maintenance yard for 9 No. houses (8 No. 2 bed apartments and 1 No. 3 bed house) and</p> <p>3.Provide for additional car parking at the Hunters Yard.</p> <p>Recommendation:</p> <p>Delete existing objectives 8 & 12 from Fig 5.1 & Table 5.2 and replace with the following:</p> <p>Insert</p> <p>12 - Provide for the development of 9 No. houses (8 No. 2 bed apartments and 1 No. 3 bed house) at the Golf Maintenance Yard subject to the capacity of the estate to absorb</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
			<p>development without detracting from the estate's landscape character and built and natural heritage context. (Relocated map Ref 12)</p> <p>9 - Provide for the development of a Golf Maintenance Facility to include changing area and other associated staff uses to the east of the service entrance to the Estate subject to the capacity of the estate to absorb development without detracting from the estate's landscape character and built and natural heritage context (Relocated Map Ref 9)</p> <p>8 - Provide for the extension of the upper car park at Hunters Yard (new Map Ref. 8).</p>
KK-C162-120	Christina Walsh	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-121	Tony Musiol	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-122	Trish Morahan and Mark Collins	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-123	Carmel Furlong	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-124	LOU Investments	<p>1.The submission requests that the Planning Authority rezone the lands associated with the Primary Care Centre from open space to Neighbourhood Centre in order to better reflect the medical use and to allow for future flexibility in terms of planning applications in order to introduce a pharmacy at ground floor level of the Primary Care Centre at some stage after it becomes operational.</p> <p>2.The "Neighbourhood Centre" 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.</p>	<p>1.Planning policy will indicate that the neighbourhood is there to provide neighbourhood facilities at a scale which will be commensurate with the neighbourhood being served.</p> <p>2.The unit is now constructed and open and is operating with various health care uses. It will integrate into the Newpark Neighbourhood centre over time.</p> <p>3.If the current zoning of the primary care unit remains then each and every new of use to go into the centre could in theory contravene the open space zoning of the site. This would make the operation of the unit impractical.</p> <p>The zoning of the primary care unit site to be changed to Neighbourhood zoning</p> <p>Recommendation: Change the site of primary care unit site (buildings and car park (as defined under ref 18/59) to Neighbourhood centre</p> <p>See also submissions 339, 390, 395 & 439.</p>
KK-C162-125	Kieran Furlong	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-126	Cindy Aylward	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-127	Caroline Cahill	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-128	David Harrington	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-129	Irene Kiely	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-130	Jamie Fennelly	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-131	Willie Dempsey	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-132	Rhona Dempsey	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-133	Anne O' Mahoney	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-134	Kaya Brennan	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-135	Eugene Duggan	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-136	Mary Duggan	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-137	Amy Duggan	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-138	Angela Walsh	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-139	Sean Kennedy	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny. 2.The redesignation of the area around Castlebanny/Mullinakill/Glenpipe appears to be based solely on high windspeed, which ignores a multitude of other factors. The Plan itself states in Section 11.5.2 <i>"it is now considered that wind speed should not be the primary determinant of suitability for wind energy generation"</i> .	1.See discussion under Section 3.2 Castlebanny. 2.A strategic approach was taken to the formulation of the Wind Energy Strategy. A sieve mapping approach has been applied, layering all the various designations to establish areas of sensitivity, against the areas of highest wind speed.

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			This is in line with the Government's <i>Wind Energy Development Guidelines</i> ²¹ . Section 11.5.2 will be amended.
KK-C162-140	Paul Walsh	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-141	Rebecca Duggan	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-142	John Lawlor	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-143	Paula McGrath	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-144	Esther Kennedy	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-145	Breda & Aiden Slane	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-146	Paul Cotter	1.Request for actual designed, safe, useable cycling infrastructure	1.Kilkenny County Council is currently working on a Local Transport Plan for the City which will include a Cycling Plan for the city. It is also an objective of the plan to compile a

²¹ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

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		<p>2.Clear objectives are needed on improving Kilkenny cycling Infrastructure to promote everyday cycling. Setting clearer objectives on steps towards proper safe infrastructure will keep cycling as a priority.</p> <p>3.Review "completed cycling lanes" in Figure MS7 as many are unsafe and unfit for inexperienced cyclists. Map cycle lanes to safety and completeness and reannotate map</p> <p>4.Notable absence of commitments to develop infrastructure, in particular in established areas</p> <p>5.Objective C5H is weak and lacks any measurable outcome.</p> <p>6.Suggests the following text from Section 12.5 is made into a specific objective <i>"making junctions safe for cyclists and removing the cyclist-unfriendly multi-lane one-way street systems."</i></p>	<p>Cycling Strategy for the county. These documents will set clear objectives and will propose infrastructure to facilitate cycling.</p> <p>2.The Cycling Plan for the City will make recommendations for the improvement of cycling infrastructure</p> <p>3.Recommendation: Review Map MS7</p> <p>4.Section 12.5.1 of Volume 1 sets out cycling objectives for the County and Section 5.6.3 of Volume 2 sets out cycling objectives for all areas of Kilkenny City.</p> <p>5.It is a clear objective to improve and enhance infrastructure, but too early to say what the financial implications arising from recommendations in the Kilkenny City Local Transport Plan will be. The current wording is considered robust enough.</p> <p>6.The text in Section 12.5 is policy of the Plan also commitment to components of the National Cycle Policy Framework is supported in the objectives in Sections 12.4 and 12.5.1</p>

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		<p>7. Questions why Objective 12I from Vol. 1 is not included in Vol. 2.</p> <p>8. Requests commitment for safe complete cycling routes from major population areas to schools and city centre, commit to upgrading junctions for cycling</p>	<p>7. The objective is to avoid duplication. Objectives stated in Volume 1 were not repeated unless for particular clarity to avoid confusion.</p> <p>8. The cycling strategy for the County and Local Transport Plan for the City will provide recommendations which will be implemented throughout the lifetime of the Plan</p>
KK-C162-147	Aoife and Eoin C.	1. This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-148	Alex Wilsdon Jnr on behalf of Califa Ltd.	<p>1. Requests a change of zoning for lands on the Dublin Road to "General Business" or "Mixed use". From the current residential zoning on the site.</p> <p>Existing uses include:</p> <ul style="list-style-type: none"> • Airtricity Utilities Services depot for public lighting. • City Direct Bus Service Depot • Druids Veterinary Clinic • Perfecto Print • Kilkenny Crane Hire • Residential house & garden <p>2. The rezoning proposed would allow for any expansion of these businesses, some of which dependent on the location.</p> <p>3. The location is within 500m of the McDonagh train station and creating employment in the vicinity of the railway</p>	<p>1. Historically the lands which contain the uses listed was a working farm and other uses established within that are over time such a veterinary practice, Kilros Agricultural supplies and in more recent times Airtricity service and City direct Bus depot. Attached to the farmyard is the original farmhouse garden and outbuildings (original farmhouse and outbuildings)</p> <p>To the rear of these is an area of open land which is currently in agricultural use. It measures approximately 2.52 ha (6.22 acres). This could accommodate at least 100 housing units at reasonable densities (16/acre)</p> <p>2. There is significant general business and mixed using zonings within the Plan area to cater for such developments</p>

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		<p>station will promote use of the train to travel to Kilkenny for employment from surrounding areas</p> <p>4.This site would be an ideal location for such a facility and with the bus service on site, a full park & ride facility could also be developed. Owner plans to trail e-bike rental from the site.</p>	<p>and where the Planning Authority is seeking such investment to be directed.</p> <p>3.The lands in question are located as stated within 500m of the Kilkenny Railway station (approximately 10-minute walk) The railway station is likely to be a transport hub for the city under the Local Transport Plan.</p> <p>Housing at this location should be promoted at densities which promote the compact 10-minute City</p> <p>There is significant lands zoned for business/commercial uses within the city both centrally and within the suburbs (Ormonde retail Part, Hebron retail Park, Woodies Abbey Quarter, McDonagh Junction, Old Mart site Cillian Hill) to accommodate such uses. Expansion into lands which have the potential to deliver over 100 houses within close proximity to all facilities while there are significant lands zoned to accommodate business and commercial uses in such locations as Hebron Business Park and Ormond Business park, the former mart site and the Abbey Quarter is not recommended.</p> <p>Recommendation: No Change</p>
KK-C162-149	Michael Cullen	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.

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KK-C162-150	Cliona Geraghty	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-151	Cunnane Stratton Reynolds Ltd Cunnane Stratton Reynolds Ltd	<p>1.Currently 14.2ha in the ownership of DKS at Hebron House, Blanchfieldslands, is zoned "Business Park" and 2ha 'Amenity, Green Links, Biodiversity Conservation, Open Space and Recreation'. The submission requests that Amenity zoned open space be retained in respect to the River Pococke being a Special Area of Conservation (SAC), but that the remaining 25 acres be rezoned from "Business Park" to "Mixed Use".</p> <p>2.The existing buildings on site including the protected structures have seriously suffered from neglect and vandalism since last occupation.</p> <p>3.Rezoning of the site from Business Park to Mixed use would facilitate a wider range of development opportunities that would protect and restore the protected Hebron House.</p> <p>4.Submissions set out the planning history, including the last application for motorway service station and reasons for refusal.</p> <p>5.The submission considers the limitations of the current "Business park" zoning for the re-use of the protected structure as a nursing home. The current zoning would only permit business use and the reuse of the existing building for that purpose is unlikely to be a realistic proposition.</p>	<p>The mixed-use zoning was introduced in the 2008 Plan to facilitate regeneration within the built-up area of the City e.g. along the Hebron Rd and at Daly's Hill.</p> <p>3.The mixed-use zoning allows the following: Dwellings, open spaces, places of worship, community facilities, halting sites, nursing homes, Bed and breakfast establishments and guesthouses, home-based economic activity, parks and open spaces, playing fields, car park, park and ride facility, childcare facility, community facility, enterprise centre, funeral home, light industry, medical and related consultants, office based industry, science and technology based industry, local convenience shop, automated teller machines, restaurant, conference facilities,</p>

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	Cunnane Stratton Reynolds Ltd	<p>6.The submission then gives 9 reasons why the land should be rezoned and expands on each, being</p> <ul style="list-style-type: none"> • The principle of development is already long established on this site; • There is existing strategic roads infrastructure already in place that is unused; • The principal commercial and office-based activities contained with the Business Park zoning are already contained within the Mixed-Use zoning; • Rezoning as mixed use provides maximum flexibility in terms of land uses and will stimulate delivery of development in this location; • The amount of land sought for rezoning and what is requested to be taken from the Business Park zoning is a very small proportion of what remains and is not the subject of any significant planning permission for business or business park development; • What is lost to mixed use in this instance can more than adequately be replaced through logical and contiguous extension of the existing Business Park zoning; • The remaining Business Park zoning is more than sufficient to meet employment needs for the City 	<p>public service installations, hotel, warehousing, including retail warehousing, discount food store, petrol station.</p> <p>The Business Park zoning allows the following: Car park, park and ride facility, childcare facility, community facility, enterprise centre, funeral home, light industry, medical and related consultants, office-based industry, science and technology-based industry, car showrooms, local convenience shop of not more than 100m2 (gross), automated teller machines, restaurant, conference facilities, public service installations, hotel, warehousing, including retail warehousing.</p> <p>The lands east of the ring road have been identified as an employment zone and include lands at Cillian Hill and surrounding lands.</p> <p>These lands given the location and extent are seen as a strategic land parcel for employment use.</p> <p>The business park zoning does not preclude the previous permission which was granted on the lands under ref 04/1953.</p> <p>Recommendation: No Change</p>

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		<p>and to maintain and deliver on Kilkenny's role as a defined Key Town;</p> <ul style="list-style-type: none"> The requested rezoning is consistent with national planning guidance and policy, regional planning guidance and the policies and objectives of the remainder of the emerging Draft Plan for the city and county; Any access from the N10 will be largely determined by the statutorily protected Hebron House and can accommodate the requirements for those uses common to the Mixed Use and Business Park land use zonings. 	
KK-C162-152	Andrew and Fiona Maloney	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-153	Mary Kelly	Rath Ullard	See submission ref. KK-C162-60
KK-C162-154	Damien Dempsey	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-155	Mark Wilschut	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-156	Irish Concrete Federation (Liam Smyth)	1.The legitimate Industry needs support in the planning process. Permissions should issue commensurate with resources and needs long terms permissions. Planning	1.Due to the continuously changing legislative and environmental requirements, the imposition of extraction time limits prevent permissions becoming non-compliant

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		<p>condition should allow for EPA Guidelines or other relevant legislation to apply to a site on an ongoing basis to allow for the environmental management procedures and emission limits to be updated without the need for a new planning application.</p> <p>2.An appropriate contribution to road improvements and maintenance should be calculated, based on a balance of impact of all road users so as not to unjustly penalise an authorised development.</p> <p>3.Section 10.2.9.2 should seek to encourage consideration of soil recovery and C&D waste recycling as a complimentary part of every extractive development proposal.</p> <p>4.Geological Heritage protection is not always the correct approach, nor is it universally endorsed by the GSI. A commitment to referring extractive development proposals to GSI would be welcomed (Section 9.2.4).</p>	<p>over time. Applications dealing with a particular extent of extraction are already dealt with in this way and are given for extended periods of time, but does not include for additional areas where requirements of the EU Habitats and other directives may come into play.</p> <p>2.Calculations for development contributions are in accordance with the Development Contribution Scheme which is also a reserved function and not a matter for the Plan</p> <p>3.The possibility of soil recovery to rehabilitate extractive sites is not precluded by virtue of the plan and can be encouraged, but remain at the discretion of the applicant.</p> <p>4.The referral of applications to the Geological Survey Ireland (GSI) is an administrative matter when processing applications and can already take place where required.</p>
KK-C162-157	Treasurer Kilkenny GAA	1.The submission supports the provision of housing in small villages around the County. These villages may have small schools, possibly a shop, a GAA Club and possibly a church and we need to keep them alive and viable.	1.Through objective 4J, the draft Plan supports the provision of Services Sites for small towns and villages under Objective 18b of the National Planning Framework. In this regard 22 villages with Social and Engineering Infrastructure have been identified for growth. Within the boundaries of these villages

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		<p>2.Kilkenny County Council can decide to purchase some land adjacent to some of our smaller villages, put in a roadway with light, water and sewerage services to facilitate serviced sites activation.</p> <p>3.A 'Hurlers Walk' in Kilkenny City where people could walk and talk about the game of hurling, Kilkenny Hurler's Remembrance Garden in Kilkenny City or Kilkenny Hurler's Garden Walk. The Hurlers walk may include 36 points of interest, one for each win of the All-Ireland.</p> <p>4.The submission proposes the addition of another outdoor (exercise driven) attraction to Kilkenny City for people to stay for when visiting the City before and after games, possibly staying over. This will enhance the local economy.</p>	<p>the Rural Housing Policy will not apply. Small clusters of housing will also be allowed in smaller rural nodes.</p> <p>2. The Plan contains text Section 4.6 and objective 4J "to develop a programme for 'new homes in small towns and villages"</p> <p>3.This suggestion is more appropriately dealt with as part of the roll out oi tourism projects for the City as a visitor attraction.</p> <p>4.The enhancement of walking and cycling in the City is set out in the Plan, and the further enhancement of the Medieval Mile, the Abbey Quarter and looped walking routes and an activity hub along the River Nore will provide a walking, cultural and shopping experience that will supplement the overnight experience in Kilkenny city.</p>
KK-C162-158	Claire, Desmond and Caithlin Dalton	<p>1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.</p> <p>2.There seem to be different rules for companies such as the wind energy developers and for individuals in their applications.</p>	<p>1.See discussion under Section 3.2 Castlebanny.</p> <p>2.All applications in the County are assessed against the development management criteria contained in the Development Plan, whether that is for a wind energy development or a one-off rural house. The Castlebanny Wind Farm application is being assessed by An Bord Pleanála, as detailed in Section 3.2 Castlebanny.</p>

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KK-C162-159	Erica McNiece	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-160	Peter Thomson on behalf of Castletown Cox Estate	<p>This submission relates to the Wind Energy Strategy and:</p> <p>1.Outlines the historical and heritage significance of Castletown Cox Estate (a protected structure) near Piltown and the importance of its landscape setting.</p> <p>2.Requests that any turbines that would be visible from any part of Castletown Cox estate would be unacceptable. Curraghmore House and Demesne in Portlaw, Co. Waterford was negatively impacted by turbines which are visible from the house.</p> <p>3.Requests that exclusion areas should extend to all areas where wind speeds favour wind turbines. This would include the backdrop to the north of the Castletown Cox Estate.</p>	<p>1.Noticed, the Draft Plan contains numerous objectives in relation to protected structures.</p> <p>2.The Draft Plan sets out a Wind Energy Strategy that is in line with the Government's <i>Wind Energy Development Guidelines</i>²². Every application for a wind energy development is assessed against the relevant development management standards in relation to its impacts, including impacts on the setting of protected structures.</p> <p>3.By its nature wind speeds are highest at the highest points. Government policy is to cater for increased onshore renewable energy capacity, and the Draft Strategy is in line with Government policy. However, a large area to the north of Castletown Cox, known as the Lingaun Valley, is now proposed as Not Normally permissible, see Section 3.1 Lingaun Valley.</p>
KK-C162-161	The Fenians GAA Club	<p>The submission from The Fenians Hurling Club in Johntown requests the following:</p> <p>1.The Protection of one- off Rural Housing policies</p>	1.The Rural Housing policy in essence remains true to previous versions in plans adopted since the 2006 Rural Housing Guidelines issued.

²² Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

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		<p>2.The Provision of a Rural Serviced Site Scheme</p> <p>3.Provision of an area of expansion of our Community Sports Field in Johnstown, jointly leased by the Fenians Hurling Club and Spa United, the local soccer club.</p>	<p>2.Objective 4J of the draft Plan supports the provision of Serviced Sites for small towns and villages under Objective 18b of the National Planning Framework. In this regard 22 villages, including Johnstown, with Social and Engineering Infrastructure have been identified for growth. Within the boundaries of these villages the Rural Housing Policy will not apply.</p> <p>3.Although the Plan does not zone lands or precure sites for facilities in smaller towns, section 8.5 includes the policy of the Council to co-operate with local sporting organisations and to enter into joint ventures where appropriate for the provision of such facilities.</p>
KK-C162-162	Aodán Ó Ruairc	1.The connection of Derdimus to Foulkstown by footpath would provide a safe walking loop and providing safe pedestrian/cyclist access to James Stephens GAA grounds at Ballinalina. This could be extended by providing a paved footpath around Outrath and a paved footpath to Coill an Fhaltaigh Millenium Wood. Longer term this could loop back to Drakelands giving an extensive, safe set of walking routes.	1. The provision of such walking and cycling connections would be a significant resource issue and is not an objective that would be covered in a reasobale timeframe.
KK-C162-163	Anita Marnell	1.If older people were allowed to build small houses/bungalow on sites available which are much smaller of one or two bedrooms with a maximum size of approx.- 125sq meters, this would start freeing up large houses for	The basis of compliance with the Rural Housing Policy remains Housing Need, being either Social or Economic in nature. The council currently allows for children to take over their parental home to enable parents to downsize. Also,

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		<p>sale to younger people. At present in most rural Communities there are no small houses/bungalows for sale. Proposal includes criteria for suitable houses.</p> <p>2. Requiring a house to be taken over by a close family member to enable a new house to be built does not suit many families for financial and other reasons.</p>	<p>Objective 18b of the National Planning Framework seeks to enhance the vibrancy, vitality and sustainability of smaller villages and towns throughout the county and to provide alternatives to Rural Housing in the form of serviced sites in smaller towns and villages. Older people in particular may benefit from a range of services available in their immediate local rural villages where the provision of a range of house types will accommodate their needs for downsizing. The unrestricted replacement of rural housing will escalate housing numbers to the extent that it will contravene the objectives of the plan in terms of the preservation of the rural amenity.</p>
KK-C162-164	Peter Thomson on behalf of Shankill Estate	<p>1. Shankill Castle, Paulstown is a 120-acre estate with a castle, gate lodges and a working farm. In the 1950s the main Waterford to Dublin road was realigned to its current position and the St. Enda's Terrace housing was developed and new estate wall built.</p> <p>2. As a settlement designated with a boundary, the submission seeks an extension of this Paulstown settlement boundary to allow for the future development of a modest retirement village on the edge of the village, to avail of the existing facilities in the Shankill Castle estate including walks, the stable block café and the tourist facilities on offer.</p>	<p>The lands are located immediately north of the existing boundary to Paulstown along the R712. Immediately across from the primary school and adjacent to the Barrow Rangers GAA club.</p> <p>At present water services are inadequate for Paulstown and an application for housing ref 19/608 was refused on the basis of lack of water services.</p> <p>It is likely that water services will be improved during the lifetime of the Plan.</p> <p>Shankill Castle is an estate of 120 acres and is a protected structure and the estate itself is and a designed landscape with woodland features in a parkland setting.</p>

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		<p>3.Retirement housing has not featured in any of the housing proposals developed and with an ageing population, demand exists and will increase with time.</p> <p>4.As Paulstown did not have a Local Area Plan, the local Authority could not take any part 5 social houses on zoned lands.</p> <p>5.A terrace of single-storey houses parallel with and opposite St Enda Terrace will balance and reinforcing the approach into Paulstown from the north, which is an objective of the draft Plan and a cluster of detached and semi-detached single-storey houses on the western half of the site will introduce greater housing choice.</p> <p>6.Other services and facilities are generally within walking distance of the site and Waste Water services are accessible.</p> <p>7.The inclusion of the site within an extended Settlement Boundary does not involve adjusting the 50kph speed limit.</p>	<p>It is considered that there is sufficient lands within the existing development boundary to allow for the proposal as identified.</p> <p>Recommendation: No change</p>
KK-C162-165	Peter Thomson on behalf of Moore and Raggett	<p>1.This submission seeks zoning for 3.62 ha of lands as "New Residential" rather than the "Strategic Reserve" zoning of to the south of Granges Road/ Dunningstown Road in Kilkenny City.</p> <p>2.The lands fall within the Loughmacask Masterplan area, replacing the previous Local Area Plan.</p> <p>3.An application for the new CBS school adjacent to the subject site and a Part 8 application for the section of the</p>	<p>The lands in question are at the outward edge of the Loughmacask Masterplan area.</p> <p>There are two existing permissions ref 10/10 and 10/15 which provide for 330 houses in total. In addition, there is a current application for housing for 75 units.</p> <p>The application for a new CBS school is currently under assessment by the Council.</p> <p>It is anticipated that development under permissions 10/10 and 10/15 will be advance during the life of the Plan.</p>

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		<p>Central Access Scheme road from Freshford Road (R693) to the proposed school are imminent.</p> <p>4.The lands to the north of Louseybush Lane will be the first lands that will be fully serviceable within the Loughmacask area and there is no guarantee the lands to the south of Louseybush Lane will be serviceable within the short term or made available for development. It is submitted, therefore, that the focus of "New Residential" zoning should be to the north of Louseybush Lane, including the subject site.</p> <p>5.Without "New Residential" zoning on the subject site, and having regard to the lack of progress in the implementation of extant permissions over the last 8 years on the lands currently proposed to be zoned "New Residential" in the draft Plan, the realisation of the Loughmacask neighbourhood is in danger of not happening within the lifetime of the Development Plan.</p> <p>6.To allow the subject site to be zoned "New Residential" and avoid over zoning, consideration could be given to the reintroduction of Phase 2 Residential zoning for some of the lands in the Loughmacask area which are less likely to be serviced in the short term.</p>	<p>The focus for development over the course of the development Plan will be mainly in the Breagagh Valley where infrastructure has been completed. Not all the lands in the Loughmacask area should be released at this time but will in due course as housing developments and infrastructure is rolled out.</p> <p>Currently these lands are not sufficiently serviced.</p> <p>Recommendation: No Change</p>
KK-C162-166	Mary Harrington	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.

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KK-C162-167	Fiona O'Sullivan	<p>1.Consideration has to be given to policies to protect "One off housing in rural areas " ...this is most important for preserving rural Ireland, and ensuring its survival, and attracting people back into the locality.</p> <p>2.Provision of serviced sites in rural parishes to prevent rural depopulation...priority needs to be given to providing completely serviced sites with excellent broadband to attract developers. Working from home" does afford the opportunity to people to live in the countryside.</p> <p>3.Broadband infrastructure has to be the norm in all villages by having a working IT hub/ office fully equipped.</p> <p>4.The council should consider trying to purchase empty houses/ business in rural villages and lease them back to the community.</p> <p>5.Support and preservation of Heritage structures which can lead to expansion of walking trails, increase the knowledge of the history of the area which is vitally important for the future generations etc.</p>	<p>1.The Rural Housing policy in essence remains true to previous versions in plans adopted since the 2006 Rural Housing Guidelines issued, with amendments required by virtue of the National Planning Framework.</p> <p>2.Objective 4J of the draft Plan supports the provision of Services Sites for small towns and villages under Objective 18b of the National Planning Framework. In this regard 22 villages, including Johnstown, with Social and Engineering Infrastructure have been identified for growth. Within the boundaries of these villages the Rural Housing Policy will not apply.</p> <p>3.The draft Plan supports the roll out of rural Broadband and will promote the attractiveness of smaller settlements and rural generally for economic development and facilitate flexible working arrangements.</p> <p>4.The plan supports the regeneration of villages and derelict structures. The Council uses Derelict site legislation and to address vacant and underutilised properties that have become derelict.</p> <p>5.The protection of structures and the expansion of walking trails is already extensively supported in the plan.</p>

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KK-C162-168	Peter Thomson on behalf of Kevin Moore	<p>1.The submission relates to a 3.62ha site on the north side of The Orchard in Kilkenny City, currently farmed. The land can be serviced immediately, it is within safe walking distance of the KK2 city bus route</p> <p>2.The submission seeks zoning for a mix of "New Residential" and "Low-Density Residential" rather than the "Strategic Reserve" zoning. This would allow for housing at a similar overall density to that nearing completion at Rath Ullard.</p> <p>3.The draft Plan envisages the development of the Breaghagh and Loughmacask neighbourhoods to the west of the city as the priority. However, once the remaining pockets of zoned residential land in the Newpark Upper/ Eastern Environs neighbourhood are developed, all of which have been the subject of planning applications and permissions, there will be no land for new housing in the neighbourhood.</p> <p>4.As currently proposed, the growth will be focused almost entirely to the west of the city in terms of new homes, schools and neighbourhood community facilities and there is only a "likelihood" of some of the land being serviced within the lifetime of the Plan and no guarantee.</p> <p>5.The reintroduction of "Phase 2 Residential" zoning and application of this to the land released to allow the east of the city to develop, would not hinder that land also developing in the lifetime of the Plan if the infrastructure is</p>	<p>1.All the land zoned in the Breaghagh Valley area and the Loughmacask area is serviced or is likely to be serviced within the lifetime of the Plan.</p> <p>2.It is important that critical mass is achieved within these plan areas during the lifetime of the Plan 2021 – 2027.</p> <p>3.This not only provides for housing but also the infrastructure to service the new housing such as roads water services an open spaces and recreational facilities.</p> <p>Notwithstanding the location of the lands within the built-up area and having regard to the planning history of the lands and the use of zoning as an active land management tool no change is recommended.</p> <p>Recommendation: No Change</p>

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		put in place and sufficient "Phase 1" zoned lands are committed or developed.	
KK-C162-169	Glendine Heights Association	<p>1.Amend wording of Objective C6R in Volume 2 to include <i>"during the period of this Plan"</i>.</p> <p>2.Requests inclusion of a timeframe for Objective C6L in Volume 2 or as an alternative prioritise this connection.</p> <p>3.Objective C6L refers to an additional bridge between John's Bridge and Ossory Bridge which provides a connection to the south, priority should be given to providing the northernmost bridge first.</p>	<p>1.The preparation and implementation will depend on finances available over the plan period and hence the implementation within the period of the plan cannot be assured.</p> <p>2.The provision of a pedestrian bridge would depend on funding and hence the implementation within the period of the plan cannot be assured.</p> <p>3.Noticed</p>
KK-C162-170	Colin Fennelly	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-171	Emma Fortune	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-172	Irish Thoroughbred Breeders' Association	1.Submission seeks the inclusion of a section on the equine industry in the Plan.	1.Section 7.2.5 of the Draft Development Plan recognises the role and importance of the equine industry and in particular the breeding, rearing and training of thoroughbred horses and seeks to support the improvement and expansion of the equine industry within the county.

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		<p>2.Outlines the importance of the equine industry to the local and national economy.</p> <p>3.States that the equine sector is sensitive to some large scale development in terms of visual impact, noise pollution and negative economic impact and also outlines effects of wind farms on the equine industry. Requests that Kilkenny be identified as a centre of excellence of national and international significance, and a policy framework be included to protect the industry from incompatible development, particularly in relation to wind energy developments, as follows:</p> <ul style="list-style-type: none"> Any large development within 20km of a registered thoroughbred equine facility should demonstrate it will have nil effects, Apply a minimum setback of 5km from wind farms, proximity to thoroughbred training and breeding establishments should be specifically identified as an environmental constraint, visual effects on equine facilities should be taken into account. 	<p>2.Noted.</p> <p>3.Chapter 11 sets out the development management requirements for all renewable energy developments. This includes reference to stud farms in Section 11.5.3.6, where it is stated that <i>"the provisions of the Guidelines in relation to noise and flicker will apply to registered thoroughbred stud farms"</i>. All other renewable energy developments must also satisfy development management standards in relation to effects on adjoining properties.</p> <p>Recommendation: A new section will be included in Chapter 11 entitled "Effects on Equine Facilities". This will include a Development management standard as follows that <i>"Applications for wind energy developments shall be accompanied by an assessment detailing potential impacts, mitigation and residual impacts upon the equine industry. Such assessments shall also consider issues including noise and shadow flicker"</i></p>
KK-C162-173	Office of Public Works	See Section 2A above	
KK-C162-174	Jane Power	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.

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KK-C162-175	Josie Grace	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-176	Kilmacow Hurling & Football Club	1.Provision should be made in the planning application process for a larger positive weighting to be given to planning applicants who demonstrate membership of local sporting and community organisations. 2.Provision of serviced sites in our rural parishes to prevent rural depopulation - If the direction of housing planning is to further restrict one-off housing applications can the County Council consider offering Rural Serviced Site Schemes for sale to local people looking to build in rural towns and villages.	1.Sporting or community membership does not ensure sustained involvement and commitment and is not a criterion set out in National Guidance. 2.Objective 18b of the National Planning Framework seeks to enhance the vibrancy, vitality and sustainability of smaller villages and towns and to provide alternatives to Rural Housing in the form of serviced sites in smaller towns and villages. The Council supports this objective though objective 4J and have accordingly designated 22 settlements for the provision of services sites throughout the County.
KK-C162-177	St Canices FC	1.Submission states that it hopes St. Canices FC would be able to avail of the potential development of any new full-sized playing pitches in the western Environs associated with the three new schools, which they hope to work with. The club's current facilities are confined to the Council owned "Waterbarracks" pitch, which is susceptible to flooding in inclement weather.	1.The Club's aspirations for growth and access to playing pitches in the Breaghagh Valley, formerly referred to as the Western Environs, is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breaghagh Valley. These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
			<p>establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p> <p>Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breaghagh valley.</p>
KK-C162-178	Bridget Finnerty	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-179	JETO Properties Ltd	<p>1.Submission on the change of zoning from "strategic reserve" to "Low density Residential" on land off the Ballyfoyle road.</p> <p>2.The site was previously zoned "Low Density Residential", but changed to Phase 2 lands in the 2014-2020 City and Environs Plan.</p> <p>3.The Draft Plan has no "Low Density Residential" land and opportunities for further low-density housing zoning is limited to gap sites along the Sion Road in the "Existing Low Residential".</p> <p>4.In particular NPF Objective 18b seeks to 'Develop a programme of "new homes in town and villages" and settlements which experience the greatest urban generated housing pressure for one off housing in their immediate hinterlands are the larger county towns and cities, including Kilkenny City. Under the draft Plan, those urban dwellers</p>	<p>1.Section 2.3 of Rural Housing guidelines indicate that Local Authorities should ensure that cities, towns and villages offer attractive and affordable housing options to meet the housing needs of urban communities and persons wishing to live in urban areas.</p> <p>3.The argument is advanced that the site proposed for housing would provide for an identified gap for low density housing for urban generated housing.</p> <p>4.The Guidelines recommend the "Development of individual serviced sites or housing schemes of appropriate scale and character, within, or in the vicinity of small rural towns and villages". Not in Towns and Cities of scale such as Kilkenny.</p>

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		<p>determined to build their own homes will be forced to do so in smaller towns and villages remote from Kilkenny City where serviced sites are planned.</p> <p>5.The ability of Kilkenny City to attract and retain high performing individuals in key positions who can develop and enhance essential facilities and/ or catalyse substantial financial investment in the local community will in large part be determined by its ability to offer them suitable housing opportunities. For this, new "low density" housing land within the city boundary is essential.</p> <p>6.The subject site has the potential for a mix of low-density houses and serviced sites.</p>	<p>5.Under construction or constructed recently are schemes that have provided for large housing on individual sites such as 14/586, 18/410, 17/860, 19/242, 19/706, 21/280, 21/252. These site in total provide for 119 large detached dwellings. Opportunities for infill and further large site develop is catered for in the policies and development management guidance in the Draft Plan.</p> <p>The lands are located outside any pre-determined expansion areas of the City over the lifetime of the Draft Plan until 2027. The lands are considered premature pending the roll out of significant development areas</p> <p>Recommendation: No Change</p>
KK-C162-180	Michelle Cullen	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-181	Rath Ullord Residents Association	Rath Ullard	See submission ref. KK-C162-60

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KK-C162-182	Alexander Walsh	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-183	Gillian Griffin	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-184	Michael Holland	1.Mr Holland wants to build on an unspecified 10-acre site in Castlecomer. Due to a shortage in sewage capacity in the Castlecomer it may be a hindrance for work to progress.	1.The Council is aware of the fact that the provision of potable water is an issue for development in Castlecomer. The Castlecomer Local Area Plan was adopted in 2019 and acknowledges the issue. The prioritisation of funding for Water infrastructure is however the responsibility of Irish Water. The Council will work with Irish Water on resolving this issue.
KK-C162-185	Caroline O'Keefe	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-186	Shane O'Keefe	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-187	Alex Wilsdon Jnr	1.In recent years there has been a noted increase Gyms, Play Centres, sports clubs etc on lands with zonings such as Business Park, Industrial & warehousing & Agri Business. This mix of activities poses some issues for parking, traffic & mixing of leisure users with active businesses.	1.Gyms are a commercial activity which are suitable in the general business zoning and also in the business park zonings. While not specifically excluded from other zoning categories in the interests of clarity it is considered that Gyms should be open for consideration in the following zoning categories:

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		2.The draft plan should address this deficiency by providing more appropriate locations for these activities which have specific characteristics that differ or conflict with other businesses at appropriate locations nearer to the residential areas that the users travel from.	Mixed Use, Existing Residential New Residential, Community Facilities, General Development New Ross. Recommendation: Add Gymnasiums as open for consideration in the following zoning objectives: Mixed Use, Existing Residential, New Residential, Community Facilities, General Development New Ross
KK-C162-188	Alex Wilsdon Jnr	1.The old railway track bed running from the Castlecomer roundabout out past Dunmore village to the Dunmore Recreation & Biodiversity park should be used for pedestrian & cycle access to Dunmore Village. Land Direct mapping shows the track bed has not been registered to others. The route of the railway is largely clear and undeveloped.	1.The Bio diversity park has gone through a Part 8 process (Ref Part 8: 12/20) and has been approved by KCC in March of 2021 with a number of access points for cycling and car parking at Dunmore community hall, at the Bleech Road entrance and with an Accessible car parking from the N77 (Castlecomer Rd, via the former Railway line from Kilkenny to Castlecomer. While the former railway may not be registered it is substantially gone. The Council has a more strategic policy to investigate the development of a Greenway to the north of the County to Castlecomer and Ballyragget which could incorporate access to the biodiversity park. See submission ERMA KK162-20)
KK-C162-189	James Cullen	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-190	Robbie Allen	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.

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KK-C162-191	Bernie Joyce	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-192	Lisa O'Connor	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-193	Aine Consulting	Rath Ullard	See submission ref. KK-C162-60
KK-C162-194	Joe Mulhall	<p>1.Submission relates to the New 'Urban Agriculture' planning zone category proposed</p> <p>2.Actively farmed land within the defined city boundary is proposed to be zoned in the vast majority of cases using one of two classifications:</p> <ul style="list-style-type: none"> • Agriculture • Area of strategic reserve <p>3.Just two active family owned/run farms representing a small fraction of the overall land received a new planning zone designation is proposed: "Urban Agriculture".</p> <p>4.The submission includes an analysis of the differences between the three abovementioned zonings. There is little practical difference in purpose and objective between them all.</p>	<p>1.The critical difference with the Urban Agricultural zoning is the fact that the two portions of land affected are within the exiting built up fabric of the city (along the Kells Road and along the New Orchard Road.)</p> <p>2.Lands zoned strategic reserve are on the periphery of the built-up area. Lands zoned agriculture are located outside the built-up area outside of any LAP Masterplan of Action Area Plan</p> <p>3.In both cases where Urban Agriculture has been proposed the areas were subject to previous Action Plans. (Smithlands Action Area Plan and Newpark Action Area Plan) and lands were developed for housing in these areas.</p>

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		<p>5.Urban Agriculture imposes restrictions on the farming activities that can be carried out. The definition in the draft plan qualifies the objective of protecting agricultural land from non-agricultural use by adding "provide for sustainable agricultural / horticultural uses. No clear definition of permitted or non-permitted farming activities are given nor indeed is the term 'sustainable' defined in this context.</p> <p>6.With Urban Agriculture unlike any other farmland zoning, the farm owners are not permitted to apply for planning permission for housing for a family member actively involved in the farm business.</p> <p>7.If the intention was to create an agriculture zoning for an 'urban context', this is negated by the use of 'Agriculture' and 'Areas of Strategic Reserve' zoning, for much more land in active agricultural use within the same city (urban) boundary.</p> <p>8.New restrictions should be clearly defined in advance of any final decision on introducing this new concept to allow for informed consultation, discussion and agreement by all stakeholders particularly the farming sector.</p> <p>9.All housing in the county is subject to the planning process, and the council already has an opportunity to refuse planning permission where it considers a development to be unsuitable or damaging to the area.</p>	<p>4.A stronger protection is required to ensure that development potential of the lands is protected given their location.</p> <p>5.There are no restrictions on agricultural practices within that zoning recognising that the lands are currently in agricultural use.</p> <p>6.In both cases the lands were removed from the vacant sites register.</p> <p>Recommendation: No Change</p>

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		<p>10. Within the same city boundary there are much larger tracts of family owned farmland in active agricultural use zoned 'Area of Strategic Reserve'</p> <p>11. 'Urban Agriculture' shares the exact same planning objective as the two other planning zone criteria for actively farmed lands within the city boundary. appears to apply extra restrictions, somewhat arbitrarily and without clear planning purpose. Either 'Agriculture' or 'Area of Strategic Reserve' zonings could be used for all actively used agricultural lands within the city boundary allowing for more effective, logical, clearer and fairer urban planning relating to land in agricultural use during the lifetime of the plan.</p>	
KK-C162-195	Vincent Kiely	1. This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-196	Eamon Bookle	1. This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-197	Pat & Therese Hearne	1. Submission writes about a proposed site for wind energy development in Garryduff Woods, which is located just north east of Owning, Piltown. Expresses concern that extra run-off water will make the farmland too wet to graze early and later in the year, and that there will be impacts on Garryduff woods. See discussion under Section 3.3 Templeorum.	1. There is currently no live application for a wind energy development in this vicinity. See discussion under Section 3.3 Templeorum.


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KK-C162-198	Martin O' Brien	Rath Ullard	See submission ref. KK-C162-60
KK-C162-199	Patrick Bookle	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-200	Noleen Bookle	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-201	Philip Brennan	1.Para 1.7 (VOL 2) Key Strategic Issues for Kilkenny City has no mention of the environment in the key strategic issues. 2.Implementation, accountability, transparency and future communications on the Development Plan should be stated and it is essential that the Council's work is known and recognised by the public at large (particularly among the young).	1.Although implicit by virtue of its prominence in Chapters 2 and 10, addressing Environmental challenges is a mainstay of the plan and remains a key issue for both the County and the City. The Plan is accompanied by a Strategic environmental Assessment and Appropriate Assessment Statement. 2.The implementation of the Plan will be communicated at the various statges of monitoring.
KK-C162-202	Thomas Bookle	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-203	Linda Murray	See submission ref. KK-C162-60	
KK-C162-204	Jessica Carroll	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.

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KK-C162-205	Patrick Brennan	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-206	Walter Power	1.Submission outlines heritage and historical importance of Sliabh Dile. See discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-207	Louise Mason	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-208	Philomena Cronin	1.Expresses concern about impacts of wind turbines in Blackbog, Ballinalina and Hugginstown. See discussion under Section 3.3 Templeorum.	1.See discussion under Section 3.3 Templeorum.
KK-C162-209	HSE	See Section 2A above	
KK-C162-210	Reuben Allen Grace	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-211	Tim Gilchrist	1.The submission seeks the removal of Mavis Bank House, Newrath, Ferrybank Co Kilkenny – RPS ref: C667 from the Record of Protected Structures due to structural issues on the rear Annex, not being energy efficient by modern day standards, health concerns particularly around single glazed windows and works required to windows and doors for security reasons.	1.The Conservation Officer inspected the structure and it is recommended that the structure not be removed from the RPS as apart from a crack visible at the interface between the rear annex and the main building, there are no other visible structural issues in the building. The property will benefit from specialised thermal treatment and the owner is eligible for a conservation grant to improve thermal performance of the building. The use of secondary glazing, spliced window repairs and new draught proofing will benefit the windows

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			and increase thermal performance of the house. The owner can obtain a Section 57 Declaration and where works don't affect the character of the house, it may proceed as exempted development. Alternatively planning permission may be obtained.
KK-C162-212	Paddy Cronin	1.This submission relates to the Wind Energy Strategy, and as a resident of Tullaghought expresses concern about wind energy development in the area. See discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-213	Kilkenny RFC	<p>1.As an established and long-standing sporting club Kilkenny RFC is particularly interested in the provision of suitable full-sized playing pitches to enable the expansion of service to meet the needs of the new community in the Western Environs and to enhance services to our existing membership.</p> <p>2.The club is eager to develop partnerships with the three new schools in the Western Environs and recognise the positivity of facilities being sited adjacent to the schools.</p> <p>3.The club requests that provision is made for an appropriate number of 120 metres by 70 metres full-sized</p>	<p>1.The Club's aspirations for growth and access to playing pitches in the Breaghagh Valley, formerly referred to as the Western Environs, is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breaghagh Valley..</p> <p>2 & 3. These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p> <p>Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-</p>

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		playing pitches adjacent to the proposed new schools in the Western Environs of Kilkenny City.	sport playing pitches on the Amenity Lands in the Breagagh valley.
KK-C162-214	Marie Fitzpatrick	1.This submission relates to the Wind Energy Strategy and expresses concern about the selection of a location for turbines– in the middle of the South Leinster way on route to the Blue way and the proposed Greenway extension from Waterford to New Ross. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-215	Vincent O'Shea	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-216	Mary O'Shea	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-217	Rita Kennedy	1.This submission relates to the Wind Energy Strategy and expresses concern about the selection of a location for turbines– in the middle of the South Leinster way on route to the Blue way and the proposed Greenway extension from Waterford to New Ross. See discussion under Section 3.2 Castlebanny. 2. Also expresses concern about Corbally Wood as an area that is designated as Acceptable in Principle. See discussion under Section 3.3 Templeorum.	1.See discussion under Section 3.2 Castlebanny. 2.See discussion under Section 3.3 Templeorum.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-218	Tullaroan GAA Club	1.The submission requests the plan to allow for protection of one-off rural housing policies and provision of serviced sites in our rural parishes to prevent rural depopulation	1.Rural Housing is not in need of protection and the policy in essence remains true to previous versions in plans adopted since the 2006 Rural Housing Guidelines issued. Objective 4J of the draft Plan supports the provision of Services Sites for small towns and villages under Objective 18b of the National Planning Framework. In this regard 22 villages, with Social and Engineering Infrastructure have been identified for growth. Within the boundaries of these villages the Rural Housing Policy will not apply.
KK-C162-219	Justin Moore	1.There seems to be an omission or lack of information regarding the (water) as in 3.6.6. "The EPA report concerning supply water as testing the ground water (sic)." There is a difference between both (reports??) and an oversight might leave ground water testing incomplete. There are 120 wells using the aquifer in the area these should be included in the report.	1.It is not clear which section is referred to as there is no Section 3.6.6 in the Plan. The Council has regard to Source protection areas and Section 10.1.8.5 "Development Management Requirements" includes the requirement to consider the Groundwater Protection Scheme.
KK-C162-220	Frank Walsh	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KK-C162-221	John Dermody	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-222	Paschal Ryan (Spa United AFC)	Spa United is a soccer club in Johnstown. The club shares Jim Maher Memorial Park with St. Fenians GAA club. The Plan should:	1.The Rural Housing Policy in essence remains true to previous versions in plans adopted since the 2006 Rural

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>1.Protect of one- off Rural Housing policies</p> <p>2.Provide a Rural Service Site Scheme</p> <p>3.Provide an area of expansion of our Community Sports Field in Johnstown, jointly leased by the Fenians Hurling Club and Spa United, the local soccer club.</p>	<p>Housing Guidelines issued but with changes as required by virtue Objective 19 of the National Planning Framework.</p> <p>2.Objective 4J of the draft Plan supports the provision of Serviced Sites for small towns and villages under Objective 18b of the National Planning Framework. In this regard 22 villages, with Social and Engineering Infrastructure have been identified for growth. Within the boundaries of these villages the Rural Housing Policy will not apply.</p> <p>3.Although the Plan does not zone lands or precure sites for facilities in smaller towns, section 8.5 includes the policy of the Council to co-operate with local sporting organisations and to enter into joint ventures where appropriate for the provision of such facilities.</p>
KK-C162-223	Tom Philips and Associates	<p>1.This submission to Kilkenny Draft Development Plan relates to the proposed site outlined in red on the map below. It measuring c. 6 ha (c. 14.82 acres) at Ormonde Woollen Mills, Canal Walk.</p> 	<p>1.The principle of having a tourism related development on the site is accepted but there are constraints as detailed in the submission such as flooding, natural and built heritage and conservation and accessibility issues.</p>

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		<p>2.The submission seeks the insertion of the following specific site objective:</p> <p><i>The Council will promote Kilkenny Castle ACA as a multi experience tourism destination and attraction in the County and will support and encourage the appropriate development of an integrated tourism/recreational product at the Ormonde Woollen Mills complex. This will be subject to appropriate development management standards and the provision or upgrade of the requisite physical infrastructure. Any proposed development on the site will ensure the protection of the integrity of the Protected Structure and its surrounds including the River Barrow and River Nore SAC and the River Nore SPA.'</i></p>	<p>2.The specific site objective should be aimed at investigating the potential at this stage.</p> <p>Recommendation: Insert specific objective Z12 as follows: <i>Notwithstanding the general open space zoning objective, the Council will be open to consider during the life of the Plan proposals for utilisation of Ormond Mill and associated lands for the development of a tourism destination and attraction for the City that will be aligned with the City & County Tourism strategy.</i></p>
KK-C162-224	Anthony Cottrell	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-225	Bernadette Kennedy	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-226	Ballagh Holdings Ltd	1.The Draft Development Plan 2021-2027 must commit a firm timeframe for the 2017 Ferrybank/Belview Local Area Plan to be reviewed given the earlier than expected change for Waterford in targets for population growth, employment growth and having regard for the creation of the Waterford Metropolitan Area	1.It is an objective (4I) to review the Ferrybank/Belview Local Area Plan as soon as is feasible following the adoption of the Kilkenny County and City Development Plan. The revision will have to have regard to agreed population targets for the concentric city and these will have to be agreed at Regional Assembly level prior to revision.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
			Recommendation: Amend Objective 4I to include for commencement within 6 months of the Plan taking effect.
KK-C162-227	David Rouse	Rath Ullard	See submission ref. KK-C162-60
KK-C162-228	Martin Doheny	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KK-C162-229	Dorothy Allen	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-230	Aiden Collins (Lightsource BP)	<p>1.The opening 'Introduction' to Chapter 11 omits solar (and indeed battery storage) from the Council's list of current renewable technologies.</p> <p>2.The Programme for Government (PfG), agreed in June 2020, commits to a 7% average yearly reduction in overall greenhouse gas emissions. The PfG should be mentioned in chapter 11.</p> <p>3.The Local Development Plan should consider the innovative approach known as co-location, where solar, battery storage and wind farms symbiotically co-exist.</p> <p>4.It should be possible to embark on repowering under compliance within a flexible and reasonable condition in any approval and clarity on the matter should be stated as an objective within the plan.</p>	<p>1.Although the Chapter deals extensively with Solar Energy, it is not mentioned as such in the introduction.</p> <p>Recommendation: Include reference to "Solar Energy" in the introduction of Chapter 11</p> <p>2.Annual targets will be set a national level and will be addressed in the Climate Action Plan.</p> <p>3.The Plan does not exclude the possibility of co-location and it is considered that subject to proper planning and development considerations, co-location can be accommodated.</p> <p>4.The definition of "Development" is set out in the act and conditions cannot govern repowering where significant changes are made to extant permissions.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>5.The final export capacity of a solar farm is not a land use issue and should not be controlled or capped within a condition of planning consent.</p> <p>6.A flexible and open condition requesting the submission and agreement of the final design, elevations, colour and location of panels and electrical infrastructure prior to the commencement of development could address the issue of non-material changes post permission.</p> <p>7.Quality Indicators for FDI investment include access to reliable energy that have come from low carbon sources. The Plan therefore should contain clear, targeted and focused policies and objectives, which demonstrate how renewable forms of energy are to be encouraged and in what areas of the local economy they can particularly assist.</p>	<p>5.The Plan does not limit the final export capacity of solar farms.</p> <p>6.Some discretion is already exercised in this regard, but the materiality of changes remains particular to each case</p> <p>7.The Planning Authority has set targets for renewable energy. Renewable Energy in the form of electricity can participate in all aspect of the economy. As a Strategic Aim and an objective (11C), in Chapter 11, Kilkenny aims to meet 100% of Electricity needs through renewable energy by 2030.</p>
KK-C162-231	Rebecca Walsh	<p>1.This submission relates to the Wind Energy Strategy and expresses concern about the selection of a location for turbines– in the middle of the South Leinster way on route to the Blue way and the proposed Greenway extension from Waterford to New Ross. See discussion under Section 3.2 Castlebanny.</p>	<p>1.See discussion under Section 3.2 Castlebanny.</p>
KK-C162-232	HRA Planning	<p>1.The submission seeks a change in zoning from Mixed Use to a Residential zoning as:</p> <ul style="list-style-type: none"> • Subject land must be flexible to facilitate the potential for multiple residential use 	<p>1.Permission was granted for a mixed-use development comprising of 266 residential units a nursing home for 126no. beds, office accommodation of 3,548sqm and small-scale retail, along with significant recreational facilities along the Breagagh valley.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<ul style="list-style-type: none"> Strategically located site on the edge of the city centre Brownfield site, identified for regeneration purposes, Highly accessible site with excellent connectivity to the city centre Fully serviced land Therefore, the subject site is eminently suitable as being included as an important residential site within the defined city. 	<p>Since the lodging of the submission An Bord Pleanala has confirmed the Councils decision to grant permission for a 10 year scheme.</p> <p>The mixed-use zoning is compatible with the scheme now permitted.</p> <p>Recommendation: No Change</p>
KK-C162-233	Martin Bookle	1. This submission relates to the Wind Energy Strategy and objects to the wind farm plan for Tullogher. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-234	Sisters of St. John of God	<p>1. The St. John of God site is 1.103ha in extent opposite St. Kierans College in Kilkenny City.</p> <p>2. The Sisters are in discussion with Sophia Housing Association to convert the St. Camillus convent building (protected structure) to apartments suitable for social housing with 11-13 units. A Phase two can also be accommodated with 6-8 single storey new builds. The site can also accommodate another single storey building.</p> <p>3. The sisters are requesting that the entire site of 1.103ha be rezoned for housing with each section of the site subject to differing densities.</p>	<p>1. The site relates to the residential area of what was the St John of God School lands. It contains the residential building used by the Sisters.</p> <p>The residential use formed part of the community use which included the school.</p> <p>The school is now separate to the residential element and there is no longer a direct link between the two.</p> <p>3. The proposed residential use is considered acceptable.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		4.A Masterplan is submitted with 4 areas, showing existing structures.	Recommendation: It is recommended that the site be rezoned to "Existing Residential" to allow for the conversion of existing structures,
KK-C162-235	Danny Walsh	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-236	Development Applications Unit (DAU)	See Section 2A above	
KK-C162-237	Yasmine Cullen	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-238	Art Generation Ltd.	1. This submission relates to the Wind Energy Strategy and welcomes the fact that lands at Byrnesgrove, Ballymartin and Ballynalacken and Ballyragget are designated as 'Acceptable in Principle'. This area is suitable for wind energy development for a number of reasons including: <ul style="list-style-type: none"> • General Environmental and Planning Suitability • Planning Precedent • Available Grid Capacity 	1. Noted. It is proposed to retain this area's designation as Acceptable in Principle.
KK-C162-239	Kilkenny Hockey Club	1.The submission requests full sized laying pitches 96mx59m in dimension. Pitches will be needed to expand the clubs service and meet the future needs of the new community in the Western Environs. Sand-dressed, 2G	1.The Club's aspirations for growth and access to playing pitches in the Breaghagh Valley, formerly referred to as the Western Environs, is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breaghagh Valley.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>synthetic pitches would be of huge benefit to our club and its progress</p> <p>2.The club is eager to develop partnerships with the three new schools in the Western Environs and recognise the positivity of facilities being sited adjacent to the schools.</p>	<p>These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p> <p>Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breaghagh valley.</p>
KK-C162-240	Barry Fitzpatrick	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-241	Peter Thomson	<p>1.Submission comprises a request for Strategic Industrial Land Zoning at Cillin Hill/Leggetsrath, Kilkenny.</p> <p>2.The submission explains the context for the request in three parts:</p> <ul style="list-style-type: none"> • Seismic impact of last 12 months in terms of Covid and Brexit and the combination of both. • The potential impact of same for Kilkenny and review the current "key Strategic issues for Kilkenny city" as articulated in the draft plan in the context of same 	<p>There are extensive lands zoned for strategic employment uses.</p> <p>No change recommended.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<ul style="list-style-type: none"> Specific recommendation to exploit this "once in a lifetime" opportunity by positioning Kilkenny as prime location for a strategic foreign direct investment <p>3.The submission proposed a 10th Strategic objective for the plan to: "To highlight and proactively promote the suitability of Kilkenny for all prospective Employers, and to expedite Strategic Development Land Opportunities for possible Foreign Direct Investments. "</p> <p>4.The Business Park zoned Land in the Draft Development Plan in the Leggetsrath area is unsuitable for a large scale or Strategic Development as the area has a Special Area of Conservation running through the area which has divided it into three distinct areas. The bigger companies Kilkenny should be attracting require large land parcels. would request that the Development Plan zones a further 50-acre site beyond the current zoning as Business Park or even "Strategic Development Land".</p> <p>5.The creation of a new access on the R712 so close to the existing Cillin Hill roundabout may be problematic. Submission suggest that the current access to Cillin Hill be noted in lieu of or in addition to the R8 Objective to open up the lands in the general Leggetsrath area – via Cillin Hill.</p>	

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-242	Tom Fitzpatrick	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-243	Kilkenny Age Friendly	<p>The submission deals with two main issues:</p> <p>1.The provision of public toilets at both the Castle and new Amenity area of the city.</p> <ul style="list-style-type: none"> • Toilets located in Kilkenny Castle and Kilkenny Courthouse are public toilets but there is no signage of same. The buildings have limited opening hours. • Numbers of visitors and residents requiring the use of public toilets would be in the region of 255,000 pa and the 4 toilets on the Parade are inadequate. <p>2.Requests the provision of two new toilet blocks, one at each end of the City to facilitate the needs of our growing population</p> <p>3.Secure long-term Coach Parking</p> <ul style="list-style-type: none"> • The submission makes some suggestions from him as to what would make Kilkenny an attractive place in order to attract additional coaches to visit: • Convenient long-term parking close to all facilities. • Drop off/pick-up points unsuitable as stopping and moving times are counted curtailing for the driver the limited legal number of driving and rest hours allowed per day 	<p>1.Toilets are currently available in the Castle. The provision of Toilets at the castle is however a matter for the Office of Public Works.</p> <p>2.The provision of additional toilet blocks is not an issue directly for the Plan. The Plan does not prevent the delivery of additional toilets within the City.</p> <p>3.The issues are traffic management issues. The opportunities and constraints will be addressed through the Local Transport plan.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>4. Conveniently located Toilet facilities, most essential for passengers when they arrive at a location and before departing to continue their journey</p> <p>5. Parking should be as convenient as possible to all amenities including coffee/tea facilities</p> <p>6. Safe secure overnight parking with CCTV cameras</p> <p>7. An App where drivers can view their vehicle. To stop buses being drained of diesel, CCTV would discourage this.</p> <p>8. Kilkenny should become a Coach Friendly City</p>	
KK-C162-244	Kilkenny GAA County Junior Board	<p>The GAA Junior Board requests that the following 3 policy issues be addressed:</p> <p>1. Serviced Sites Initiative.</p> <p>Some of our smaller rural areas within the county are experiencing poor growth in population. This is impacting local communities as they try to survive. The council should promote development in those smaller areas and schemes like the Serviced Sites Scheme should be an objective for all smaller villages including villages not mentioned in the Draft Plan.</p> <p>2. Water & Sewerage.</p> <p>There are many villages around the county that badly need sewerage upgrades or new sewerage schemes. Some schemes are at capacity and other smaller areas have none at all. The plan should contain an objective for the provision</p>	<p>1. Objective 18b of the National Planning Framework seeks to enhance the vibrancy, vitality and sustainability of smaller villages and towns and to provide attractive alternatives to Rural Housing in the form of serviced sites in smaller towns and villages. Objective 4J of the draft plan supports this objective and have accordingly designated sites in the district towns and 22 settlements for the provision of services sites throughout the County See Sections 4.6-4.8</p> <p>2. The provision of water and Wastewater is the responsibility of Irish Water and provided in accordance with Irish Water's Capital Investment Program. Kilkenny County Council is however working with Irish Water to upgrade water and</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>of upgraded sewerage schemes and new sewerage schemes where there isn't any.</p> <p>3.Rural Housing Policy</p> <p>The county as a whole is 90% considered as an Area Under Urban Influence in the Draft Plan. This makes obtaining planning permission far more difficult to achieve. This is not an accurate assessment.</p> <p>Figure 4.2 should be changed to accurately reflect areas of Urban Influence. Areas of Urban influence usually are areas in close proximity to large urban areas. Figure 4.2 should be changed accordingly.</p> <p>4.The weighting given to achieving planning permission on higher ground needs to be reduced as this also impacts rural housing.</p> <p>5.Anybody born in an area should be considered as fulfilling the local affiliation clause. The draft plan doesn't reference this specifically enough. This should apply even if they only</p>	<p>wastewater services to the smaller settlements. See Section 10.1.7. in this regard.</p> <p>3.The Categories for compliance with the rural housing policies are set out in Objective 19 of the National Planning Framework and the demarcation of the policy areas is evidence based. The plan still provides for local affiliations based on a demonstrable Social Need to live in an area, but adds the criteria of Demonstrable Economic Need. In conjunction with the new designations, requirements for compliance in any of the 22 settlements with boundaries dotted around the county has been removed, thus allowing anyone to potentially settle in a wide range of villages spread uniformly across the County, serving all rural areas. Once new National Guidance is published the plan will be reviewed for compliance.</p> <p>4.Visual impact and the assimilation of rural housing into the landscape remains an important consideration in the protection of rural character and amenity and each application is considered on its own merit.</p> <p>5.The five-year requirement allows for links to the area to be established and is not exceptionally onerous. Once new</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>live there for a short period it is still their home and they may wish to return.</p> <p>6.Removing hedgerows is another issue cropping up in quite a lot in planning applications. This is also having an impact on Planning Applications and should be addressed in the plan with the following comment, "where there are sightline issues and where the hedgerow needs to be removed this should be allowed to be pushed back rather than removed and should not impact planning decisions".</p>	<p>National Guidance is published the plan will be reviewed for compliance.</p> <p>6.The requirement to set back hedgerows is a road safety consideration. While hedgerows can be "moved" back it is not a straightforward process. In general hedgerow removal becomes an issue where it is considered there is excessive set back required either in length or in distance back from the road. This issues can be resolved by relocating the proposed entrance or by detailed replanting proposals. There is guidance on this issue in the Council's Rural Design Guide which is available free and can be downloaded from the Council's website.</p>
KK-C162-245	Kilkenny Stars Basketball Club	<p>1.Submission from Kilkenny Basketball under 18's club with 300 members expresses hope that new amenity, recreational and sports facilities should be located beside the 3 new schools in the Western Environs.</p> <p>2.The submission expresses hope that the new amenity and recreational facilities in Western Environs will include an Outdoor Basketball Court to allow players and coaches to</p>	<p>1.The Club's aspirations for growth and access to playing pitches in the Breagagh Valley, formerly referred to as the Western Environs, is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breagagh Valley..</p> <p>These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		exercise and train outside in the healthy open air as well as a full sized multi use green area such as a GAA / Soccer pitch with a running track/ walking and cycling route for wider community use.	Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breaghagh valley..
KK-C162-246	Noreen Smith	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KK-C162-247	Eirgrid	See Section 2A above	
KK-C162-248	Irish Wheelchair Association (IWA)	<p>1.Despite the ongoing implementation of the National Housing Strategy for People with a Disability there is still no strategically planned annual supply of fully wheelchair accessible properties.</p> <p>IWA recommends that:</p> <p>2.IWA recommends that a property is designed to be sustainable over the lifetime of a person who is a wheelchair user as needs, use of mobility and exercise equipment and the requirement for personal assistance change.</p> <p>3.Kilkenny Development Plan includes IWA's Think Ahead, Think Housing campaign in their housing strategy, which encourages people with disabilities to apply to their local authority to secure their future housing needs.</p>	<p>1.Noted</p> <p>2.The Council follows a Universal Design/Lifetime adaptable approach to new housing and implement all required guidance in this regard. This approach is currently undertaken but would be more related to disability strategy than anything else.</p> <p>3.The Think Ahead, Think Housing campaign has not yet launched. The campaign is proposed to encourage people to apply for local authority housing and therefore does not influence housing policy as such.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>4.Kilkenny Development Plan commits that that all social housing projects supported by Capital funding from the Department of Housing, Planning and Local Government deliver 7% of integrated fully wheelchair accessible social housing units within choice locations that are accessible to community amenities and transport links. Furthermore, the inclusion of fully wheelchair accessible design should be incorporated into each social housing project planning at stage 1 of the Capital Appraisal Process.</p> <p>5.Mixed tenure developments or integrated housing which will ensure sustainability of all future housing in terms of a mix of people; their ages and backgrounds, ensuring that persons of different ages and persons with and without disabilities from all walks of life are part of all future housing developments.</p> <p>6.All future housing should meet or exceed energy requirements.</p> <p>7.Kilkenny Council should ensure that the expertise of people with the lived experience of disability is included in the development and roll out of the Housing Strategy for Disabled People.</p>	<p>4.This primarily a matter for the Dept of Housing to dictate but would already be covered in Social Housing Design Guidance. The Council could put a general statement in the Housing Strategy re including wheelchair accessible units where feasible.</p> <p>Recommendation: Include text in Section 7 of the Housing Strategy to <i>"Where feasible, include at the project planning stage (Level 1 of the Capital Appraisal Process) provision for units with are fully wheelchair accessible."</i></p> <p>5.The Council promotes mixed tenure in all application and Part V covers mixed tenure requirement insofar as it can.</p> <p>6.Energy efficiency requirements are included in the Building Regulations.</p> <p>7.This is an operational matter and not a matter for the Development Plan.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>8.Kilkenny Council creates a register of accessible housing available from the local authority and Approved Housing Bodies in the area.</p> <p>9.Part M of the Building Regulations (2010) should be reviewed to include mandatory provision for liveable wheelchair accessible housing.</p> <p>10.Kilkenny Council promotes IWA Best Practice Access Guidelines (4th Edition) as a standard of choice in all new building designs.</p> <p>11.Kilkenny Council develops a plan to make the approach and access to all housing complexes wheelchair accessible.</p> <p>12.A review of the means testing of the Housing Adaptation Grant as it is out of touch with current building costs.</p> <p>13.Kilkenny Council creates a database with the following information readily available:</p> <ul style="list-style-type: none"> • Number of people on the housing list requiring supports to live independently. Number of people (requiring supports) in an offer zone. • Number of people in the offer zone who have received the required supports within 6 months. 	<p>8.This information on our iHouse (Housing Management database system). Work is ongoing on improving the quality of information on this database, but is not a public record.</p> <p>9.This is a Dept of Housing / Building Control issue</p> <p>10.The Plan promotes the NDA Building for Everyone-A Universal Design Approach. See reference in Section 12.10 and 13.2 in this regard.</p> <p>11.This already being done where possible and is a requirement of Part M of the building Regulations</p> <p>12.This is a Housing Policy issue as opposed to a development plan issue.</p> <p>13.The Housing Section's iHouse (Housing management database system) already has such data available, but work is ongoing on improving the quality of information. This database is not on public record.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<ul style="list-style-type: none"> Number of people in the offer zone who have not received the required supports within 6 months. 	
KK-C162-249	Colaiste Pobail Osrai	<p>1.The School requests Full size multi-sport grass or synthetic playing pitches</p> <p>2.That the playing pitches be located adjacent to the schools</p> <p>3.Safe walking and cycling infrastructure and connectivity to the city</p> <p>4.The promotion of the Irish language in the area through signage, street names etc.</p>	<p>1.The School's request for playing pitches in the Breaghagh Valley, formerly referred to as the Western Environs, to be available to schools and the community is noted. These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery.</p> <p>2.In accordance with the current plan the pitches will be located within the designated public park area close to but not adjacent to the schools.</p> <p>3.As part of the rollout of the Breaghagh Valley Plan, sustainable walking and cycling infrastructure will be required to form part of any planning proposal and will be informed by the Walking and Cycling plan for the city. Also see objectives 12 I and 12J in this regard.</p> <p>4.It is already a legislative requirement under the Official Languages Act that Irish be used in place names and signage.</p>
KK-C162-250	Martin Whitty	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-251	Irish Wheelchair Association (IWA)	<p>1.The IWA submits that shared space, shared surfaces as an urban design concept is generally not supported by people with a disability and is not recommended by IWA as a safe and inclusive design approach.</p> <p>2.The IWA recommends against:</p> <ul style="list-style-type: none"> • Removal of signal-controlled crossings • The removal of kerbs. • Cycle areas where cyclists are not required to dismount. • The use of bus islands • Parking spaces along cycle lanes • Cycle lanes on pavements. • Traffic light crossing times of less than 20 seconds • Bus and tram shelters that do not contrast against the background 	<p>1.Noted.</p> <p>2.Noted. These are traffic management arrangements that are not issues for the Plan as such, which already refers to the <i>Design Manual on Urban Roads and Streets (DMURS)</i> and <i>Building for Everyone: Universal Design Approach, External Environment and Approach</i> as guides. See Sections 12.10. and 13.2</p>
KK-C162-252	Waterford Golf Club	1.Submission requests that a portion of our Strategic Reserve land [approximately 0.7 of an acre] rezoned to allow Waterford Golf Club's Head Greenkeeper to build his family home as he needs to be available outside of working hours.	1.Waterford Golf Course is located within the area covered by the Ferrybank- Belview Local Area Plan and this matter should be dealt with during the review of that Plan in accordance with objective 4I, which will follow on from the adoption of the City and County Development plan. (See submission KK-C162-29)
KK-C162-253	Irish Wheelchair	1.The submission states there is an urgency for the plan to review the outdoor environment and to strategically plan how adaptations can be incorporated to accommodate	1.Universal Design is requirement for all Public Spaces and all development, new or retrofit, are to comply with the Building

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
	Association (IWA)	<p>people with disabilities and their right to exercise, socialise and enjoy the many benefits that being in the outdoors has to offer.</p> <p>2.The Plan should refer to the <i>Great Outdoors Access Guidelines</i> in designing and maintain the many parks and recreational zones of the city and county which IWA Sport and Sport Ireland have developed to provide organisations and land managers with relevant guidance and information relating to accessible design, including, in some instances.</p> <p>3.IWA strongly recommends the allocation of Changing Places facilities at strategic locations within the city centre and its environs, e.g. in public buildings that are open at weekends and evenings as well as office hours.</p>	<p>for Everyone: Universal Design Approach, External Environment and Approach. See Section 13.2. in this regard.</p> <p>2.Recommendation: That the plan includes in Section 13.2 reference to "<i>Great Outdoors Access Guidelines</i>" to guide the design of outdoor spaces.</p> <p>3.This is an operational matter, but the Council will welcome working with the IWA to provide accessible changing places.</p>
KK-C162-254	Mark Bannon on behalf of Raggett Homes	<p>1.The request is for the rezoning of a 0.4Ha portion of land immediately West of the Met station at Dunningstown Road and which adjoins Talbot's Court to be zoned for medium density residential usage to protect and reflect the established residential character of the area.</p> <p>2.The site has services readily available.</p>	<p>1.The land is outside the existing boundary to the Loughmacask Masterplan boundary.</p> <p>2.The lands are considered premature pending the roll out of significant development in the Loughmacask area itself and also areas such as the Breaghagh Valley, and significant sites within the built-up area of the City such as Abbey Quarter.</p> <p>Recommendation: No Change</p>
KK-C162-255	Nina Peaker	1.This submission relates to the Wind Energy Strategy and expresses concern about the selection of a location for	1.See discussion under Section 3.2 Castlebanny.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		turbines– in the middle of the South Leinster way on route to the Blue way and the proposed Greenway extension from Waterford to New Ross. See discussion under Section 3.2 Castlebanny.	
KK-C162-256	Breda and Denis Deasy	1. This submission relates to the Wind Energy Strategy and expresses concern about the proposed wind farm for Castlebanny, particularly as they have had experience of the excavation of a quarry on the hillside above their home. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-257	O'Loughlins Gaels GAA Club	<p>1. The club supports the development of full-sized pitches (GAA 90 metres * 145 metres) (Soccer 90 metres * 130 metres) in the Western environs to enhance services to our existing membership in the wider community of Kilkenny City and County.</p> <p>2. The Club is eager to develop partnerships with the three new schools in the Western Environs and recognise the positivity of facilities being sited adjacent to the schools.</p> <p>3. Suitable synthetic pitches would be of major advantage and such a facility is not available in Kilkenny at present.</p>	<p>1. The Club's aspirations for growth and access to playing pitches in the Breaghagh Valley, formerly referred to as the Western Environs, is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breaghagh Valley.</p> <p>These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p> <p>Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breaghagh valley.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-258	Henry Shefflin	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-259	Kilkenny Ladies Gaelic Football Club	<p>1.The club relies heavily on Dicksboro and James Stephens Hurling and Camogie Clubs to accommodate training and matches, but are particularly interested in the provision of suitable full-sized playing pitches (a number of with dimensions of 90 metres *145 metres (as a minimum)) to meet the needs of the new community in the Western Environs in addition to enhancing services to their existing membership in the wider community of Kilkenny City and County.</p> <p>2.The proposal in Section 8.5.2 to "Make better/more frequent use of existing sports facilities, including sharing of facilities" is a misnomer having regard to the issues and</p>	<p>1.The Club's aspirations for growth and access to playing pitches in the Breaghagh Valley, formerly referred to as the Western Environs, is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breaghagh Valley.</p> <p>These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p> <p>Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breaghagh valley.</p> <p>2.The approach is sequential and where no facilities are available the development of new facilities is available once other options have been exhausted.</p>

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		<p>constraints highlighted above in terms current arrangements around sharing of facilities.</p> <p>3.The Club urges the Council to consider including an objective (in Volume 2 City) to prepare an audit of Existing Sporting Facilities & their current & future capacity requirements in the City in order to ensure that sufficient lands are zoned (identified) for future recreational and sporting requirements.</p>	<p>3.The Kilkenny Recreation and Sports Partnership conduct research into the capacity of recreational facilities and the Council liases with the KRSP in this regard.</p>
KK-C162-260	Helen Dermody	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-261	Peter Thomson on behalf of O'Sheas Farm	<p>1.The submission requests the inclusion of a parcel of lands into the settlement boundary of Fiddown. Planning permission was granted under planning permission ref: 06/2324 for a factory for manufacturing and storing garden furniture and fencing products on this land.</p> <p>2.The developing of the balance of the former "industrial" zoned land between the existing Piltown Engineering workshops and parking and the N24 road carriageway would be inappropriate and contrary to objectives of the draft Plan towards the future development of the village.</p>	<p>1.Considering the size of Fiddown, the proposed land is at a remove of the town centre on the far side of Piltown Engineering and its inclusion will contribute to neither sequential residential development nor compact growth as required in the NPF and hence it is not considered that the inclusion of the lands would promote the long-term sustainable development of the town.</p> <p>Recommendation : No change</p>
KK-C162-262	Peter Thomson on behalf of O'Sheas Farm	1.In light of the Ferrybank and Belview Local Area Plan offering no serviced site opportunities, the designated Small Towns and Villages close to the Waterford Environs	1.. Considering the existing footprint of Piltown, the land already identified as potential areas for expansion it is sufficient lands are already within the boundary.

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		<p>will have an essential role in meeting the demand for serviced sites over the Plan period. The submission requests the inclusion of a portion of land adjacent to the river Pil into the settlement boundary of Piltown with potential access via the site of an existing bungalow.</p> <p>2.Previous permissions were applied for but refused due to, amongst others, lack of services.</p>	Recommendation: No change .
KK-C162-263	Patrick Dowling	<p>1.This submission requests an amendment of the current proposed settlement boundary for Urlingford town to be extended to include a 4Ha parcel of land.</p> <p>2.The submission shows the lands have the benefit of services provided by Irish water, including foul sewers and watermain supply which directly abuts the lands.</p> <p>3.The lands are within the 50km speed limit and in close proximity (700m) of all services Urlingford town offers, including school, Sports and Recreation facilities, Library, Garda Station, Shops, Restaurants, Financial Services and Church.</p>	<p>1.Considering the size of Urlingford and the extended linear nature of its historic growth, it is considered that the town now requires some consolidation to promote a more compact form. The inclusion of the proposed lands will however extend the linear form of the town, will not contribute to compact growth as required in the NPF and hence it is considered that its inclusion will not be in the interest of a more compact form and the long-term sustainable development of the town.</p> <p>Recommendation : No change</p>
KK-C162-264	Martin Gittens on behalf of Westcourt Healthcare Ltd	<p>1.The subject site is bounded by upper Pennefeather Way/ and the new pedestrian route traversing Lakeside Park and immediately adjoins the existing carpark of Newpark Neighbourhood Centre.</p> <p>2.The purpose of the submission is to establish in broad terms a framework for the development of the subject lands</p>	<p>1.Site is owned by the Council and was part of the open space delivered from the completion and taking in charge of the Lintown housing scheme.</p> <p>2.It is now part of the linear park from Garringreen and Johnswell Rd area to Newpark Neighbourhood Centre and further to the city.</p>

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		<p>for Neighbourhood Centre development as against the Recreation / Amenity / Open space zoning currently applied.</p> <p>3.The submission sets out the site's detailed description and characteristics and states that that this site is suitable for a denser urban generated development which will re-establish the vicinity as a defined urban centre within the overall city environs.</p> <p>4.The zoning of the site will:</p> <ul style="list-style-type: none"> • Facilitate future expansion of the Newpark Neighbourhood Centre and The Newpark Primary Care Centre. • Facilitate the development of the facility into a central community development node. <p>5.The site can be accessed via the existing access to the adjoining neighbourhood centre- with pedestrian linkage to Lakeside / Pennefeather Way.</p> <p>6.The request to Kilkenny County Council is that our clients zoning proposal is seriously considered. We would request that the appropriate Neighbourhood Centre or mixed-use Zoning(s) is implemented in the forthcoming Local Area Plan.</p>	<p>3.This submission was requested to be withdrawn by letter on the 8th April 2021.</p> <p>4. Recommendation: No Change</p>
KK-C162-265	An Taisce	See Section 2A above	
KK-C162-266	Mervyn and Nicola Briscoe	1.Submission objects to the change in designation for their area of Templeorum, which is located approx. 2km east of Owing. See discussion under Section 3.3 Templeorum.	1. See discussion under Section 3.3 Templeorum.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-267	Tom Philips and Associates	<p>1.The submission requests that the zoning of a site (c. 0.1 ha) adjacent to the Kenny's well on the Kennyswell road be changed from "Amenity/ Green links/ Biodiversity Conservation/ Open Space/Recreation', to 'New Residential', thereby permitting appropriate development on the site.</p> <p>2.The subject site, which is located within the built-up residential area of Kilkenny City in the St. Mary's ACA is suitable for an infill residential development of 2 housing units.</p> <p>3.The submission sets out the site context and the planning history of the area and the issues raised.</p> <p>4.It is the submission's contention that the 'Amenity' zoning on the subject site is not a viable land use - zoning objective for the site.</p> <p>5.The site fall within flood zones A and B and the submission indicates how houses can be locate having due regard to same.</p> <p>6.The submissions sets out how the site contributes to compact growth and infill development and will contribute to the 10 minute city and sustainable mobility.</p>	<p>The proposed change of zoning is immediately adjacent to Kennys Well.</p> <p>The Well has the following designations:</p> <ul style="list-style-type: none"> • RPS B115 • RMP - KK019-024----Ritual site - holy well <p>It is considered that development at this location would negatively impact on the well which is an archaeological site.</p> <p>Recommendation .No Change</p>
KK-C162-268	Padraic and Yvonne Treacy	Rath Ullard	See submission ref. KK-C162-60
KK-C162-269	Marion Acreman	<p>The submission seeks 11 changes to the Draft Plan.</p> <p>1.Amend S3.4.2 of the Draft Plan as follows: Insert the following paragraph: The Core retail area for Kilkenny City</p>	<p>1.The direct connection between McDonagh Junction and the retail Core area is via John's Street which.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
	MacDonagh Junction	<p>will be complemented by the MacDonagh Junction Retail/Mixed Use Opportunity Site to provide the necessary connectivity within the City Centre and address existing severance.</p> <p>2. Amend the Core Retail Area map which follows S 3.4.2 and also the Appendix 2 map to add the Retail/Mixed Use Opportunity Site at MacDonagh Junction to the core retail map.</p> <p>3. Amend the retail objectives at S3.4.4 to include a new objective (iii) To support the development of the Retail/Mixed Use Opportunity Site at MacDonagh Junction. The quantum of retail development at the site is not limited and is not subject to retail impact assessment as it is recognised as a retail/mixed use opportunity site located beside the public transport hub. Renumber all subsequent objectives at S 3.4.4.</p>	<p>The Council has carried out intentional positive direct responses in urban design and public realm restructuring to improve city life for the better for all citizens. It has also planned in the longer term for positive interventions in urban design place making and public realm restructuring across the City.</p> <p>2. The Core retail area is defined by the High St. Kieran St. Rose Inn St. It is a requirement to define, by way of a map, the boundaries of the core shopping areas of city and town centres and also location of any district centres (See Section 3.4);</p> <p>Insufficient evidenced base provided to warrant a change to Retail Core as suggested. To include John's Street & McDonagh junction within the core area would then allow a much wider catchment as edge of centre and potentially more sites for consideration.</p> <p>3. McDonagh Junction is identified as a retail opportunity site. As it is located outside of the Core retail area and given the potential floor area involved a retail impact would be likely.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>4.Amend Policy 4: City/Town centre first: The order of priority for the sequential approach is to locate retail development in Kilkenny City Centre CRA, and MacDonagh Junction's opportunity site the District Town Centre CRAs and village centre</p> <p>5.Amend Policy 5: Retail Impact Assessment: A retail Impact Assessment will only be required for development outside the retail core area and phase 1 opportunity sites. which features etc.</p> <p>6.Amend Policy 6: Kilkenny City Centre by the insertion of the following: In order to strengthen the retail function, profile, and competitiveness of Kilkenny City an opportunity site at MacDonagh Junction has been identified and applications for retail and other mixed-use development here will contribute to retaining Kilkenny's role as the dominant retail destination and will be supported.</p> <p>7.Amend S 2.9.19 of the Development Plan to include an objective for public realm improvement to connect John Street to MacDonagh Junction.</p> <p>8. Amend Fig CS3: Key Public Spaces in the City and include the projects F, G, H and I as follows and revise the map to indicate these projects.</p>	<p>4. Seeks to place order of choice from retail core in the City then McDonagh Jnct and then the District towns. This is inappropriate as the District towns are below the City in the settlement hierarchy and the scale of retail is not comparable between levels in the hierarchy. Policy 4 as written follows sequential approach.</p> <p>5. This is already the policy. Where development is within the retail core area of the city or town it does not require a retail impact assessment against that core area.</p> <p>6. It is inappropriate to single out McDonagh junction singularly which if done could prevent other potential opportunities coming forward.</p> <p>7. The ongoing civic realm upgrades are in the context of improving the public realm for vulnerable road users. Should a scheme be devised that allows for such improvements then John Street can be added to this list of public realm improvements</p> <p>8. For objective F listed the existing junction was designed prior to the construction of the ring road extension so traffic is much reduced in this area. This area will be examined in</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>F: Upgrade pedestrian connectivity of John Street to MacDonagh Junction.</p> <p>G: Upgrade public pedestrian realm on John Street.</p> <p>H: Enliven and upgrade public life at Goods Shed Square at MacDonagh Junction and promote vitality and vibrancy of the overall connected public realm.</p> <p>I: Integrate direct pedestrian link between public transport hub and MacDonagh Junction.</p> <p>9. Insert the following at Section 6.2</p> <p>The making of Quality Place: The development of the opportunity retail/mixed use site at MacDonagh Junction will consolidate and complete the regeneration of MacDonagh Junction and the enlivenment of Goods Shed Square Civic Plaza and the integration of public realm improvements on John Street will contribute to the public life and sense of place and a connected vibrant retail city centre.</p> <p>10. The Workhouse and Goods Shed should be listed as buildings of Interest in the Development Plan and included on the walking trails of Kilkenny City.</p> <p>11. City Tourism Objectives:</p> <p>Add C3 Objective: Enhance pedestrian facilities at junction of Dublin Road, Castlecomer Road and John Street adjacent to Kilkenny train/bus station (Public Transport Hub)</p>	<p>the context of active travel in the first instance but also from a public transport perspective.</p> <p>Making of place at Goods Shed Square is not a direct responsibility of the Local Authority but the Local Authority would welcome any such proposals.</p> <p>Recommendation include the following objective Prepare a scheme for the junction of John's Street Upper with the Dublin/Carlow rd and Castlecomer rd to address connectivity between the Railway station/McDonagh Junction and the City centre via John's Street</p> <p>9 The making of place at Goods Shed Square is not a direct responsibility of the Local Authority but the Local Authority would welcome any such proposals. There is strong support in the Plan for "Place Making" and the contribution it makes to the vibrancy and vitality of the urban area.</p> <p>10. The workhouse and goods shed and the tour can be referenced in the text as requested.</p> <p>11. This is covered in point 7 above.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-270	Niamh Smith	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KK-C162-271	Ollie and Carmel Harrington	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-272	Tom Philips and Associates on behalf of Ormonde Construction Ltd	<p>1.The site measures 13.67 acres (5.53 ha) and is located in the Breagagh Valley. The proposal is to rezone the site from 'Strategic Reserve' – to 'New Residential'</p> <p>2.It is submitted that the zoning of the land will contribute towards achieving the 10-minute city and housing targets, considering more land needs to be zoned than required due to market's delivery lag and infrastructure lag.</p> <p>3.Considering comparing the site with others zoned "Strategic Reserve", the subject site is the most appropriate for rezoning.</p> <p>4.The site context was assessed, including its context in the 10-minute city, the proximate social infrastructure, proximity to the LIHAF road, National Planning Framework and Guidance and the RSES.</p> <p>5.The Proposal considers the Section 28 Guidance and compares ESRI figures with the Core Strategy figures. The submission concludes that it does not address:</p> <p>6.How much zoned land is needed to achieve these annual targets?</p>	<p>1.The lands are located within the CSO boundary so by definition are within the built-up footprint of the City. The land is immediately adjacent to the LIHAF infrastructural scheme which is nearing completion.</p> <p>A planning application for 77 housing units was lodged with the Planning Authority on the portion of the lands already zoned residential.</p> <p>Having regard to the location of the site within the footprint of the City, the infrastructure being delivered in the area through the LIHAF scheme. The location of the lands within the Breagagh Valley plan led neighbourhood and the level of infrastructure planned (a primary school and 2 x secondary schools) it is considered acceptable to zoned the 5.53 ha for residential development.</p> <p>Recommendation: Add 5.53ha to the Zoning new residential / Existing residential.</p> <p>Insert requirements for Block M in the Plan.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>7.Where should zonings be allocated and what is the order of priority in the zoning of land?</p> <p>8.What type of housing will be needed in each instance? Traditional housing, apartments, co-living (now quashed), etc.?</p> <p>9.This in the core strategy will not be sufficient to deliver the number of built houses required in the HNDA guidance based on historical trends relating to the translation rate from permitted developments to build houses. The shortfall in zoning requirement to meet the identified need in the HNDA guidance is of the order of between c.29.5ha.</p> <p>10.The subject site is the closest landbank within the strategic reserve to key infrastructure and in particular the City Centre. The subject site is already well serviced with existing water and drainage infrastructure, alongside the recent investment in the area through the LIHAF road and school campus. Sufficient land must be zoned for 'New Residential', otherwise it is likely that the year-on-year deficit that is currently evident in the county in relation to housing requirements will be further compounded.</p>	
KK-C162-273	Castlecomer Discovery Park	1.The Castlecomer Discovery Park is encouraged by the continued focus and support for Tourism as a key economic driver for the County in the plan	<p>1.Noticed</p> <p>2.The 2012 Mary Tubridy and Associates report investigated option around the creation of a Greenway from Abbeyleix to</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		2.The submission requests that a greenway from Kilkenny City to Castlecomer be included in the plan, in addition to the Waterford to New Ross Greenway	Kilkenny City. The Study did not consider the Castlecomer Branch line, but states that "Castlecomer can be linked by another Greenway via a branch line. Recommendation: It is recommended that the following statement be included in Section 8.4 as follows: <i>"The Council will investigate the potential of developing a Greenway from Kilkenny to Castlecomer and Ballyragget and onwards to Portlaoise as part of the development of Greenways and Blueways within the County".</i> See Kk-162- 20
KK-C162-274	Rebecca Turbitt McEvoy	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KK-C162-275	Veronica Smith	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-276	Catriona Carroll, Save the South Leinster Way Group	1. Submission relates to wind energy strategy and asks that the Council retain the current wind energy designations across the county, in particular for the Castlebanny area. See discussion under Section 3.2 Castlebanny. 2. The Group encourages Kilkenny County Council to take this opportunity to assess the potential that can be harnessed from Solar energy developments.	1.See discussion under Section 3.2 Castlebanny. 2.The Draft Plan recognises the contribution that solar can make to our renewable energy targets, and contains a comprehensive section on Solar Energy in Section 11.8.
KK-C162-277	Seamus Walsh	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-278	Mairead Eoin	<p>1. Would appreciate greatly if Kilkenny County Council could liaise closely with TII to highlight our very legitimate concerns regarding the N77. Requests that significant road upgrade works be undertaken on the N77 similar to footpath on the N10 Callan extending for 1.7km from ring Road to include:</p> <ul style="list-style-type: none"> • Widening of the road • Provision of cycle-paths and footpaths with appropriate lighting • Traffic calming measures • Enhanced visibility at junctions 	<p>The N77 is a National Road and falls under the auspices of the TII for control of developments and funding. The provision of the upgrades mentioned would require an appropriate feasibility study and approval from the TII. The Plan as drafted does not preclude such a scheme coming forward if it is considered feasible during the life of the Plan.</p>
KK-C162-279	Catherine and Alan Carroll	1. Submission objects to the change in designation for their area of Templeorum, which is located approx. 2km east of Owing. See discussion under Section 3.3 Templeorum.	1. See discussion under Section 3.3 Templeorum.
KK-C162-280	Elaine Aylward	1. This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-281	Thomas Cunniffe	See submission ref. KK-C162-60	
KK-C162-282	Tom Philips and Associates on behalf of Jangate Ltd	<p>1. Submission seeks the rezoning of 22.76 ha of land to two zonings of Industrial/Warehousing 'and' 'Industrial/Technology Park' with the proposed zoning split 50% across the site.</p> <p>2. A portion the lands (11.3ha) is currently zoned Industrial/Warehousing</p>	<p>These lands are already zoned industrial warehousing and partially developed.</p> <p>Recommendation: Zone the 22.76ha of land as requested. The following site-specific objectives are recommended.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
			<p>Z14 For development to take place on this site the partially completed internal road must be completed and connected to the Outrath road.</p> <p>Z15: The roads objective R2 must be completed before development becomes operational.</p>
KK-C162-283	Tom Grace	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-284	Niall Kinsella	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-285	Áine Knox	1.This submission relates to the Wind Energy strategy and objects to the proposed change in designation for the South Kilkenny area, but the area is not specified. Expresses concern about wind farm developments damaging the local area, bring an increase in unsuitable traffic and increasing the anxiety levels of those living nearby.	1.See discussion under Section 3.1 Lingaun Valley, Section 3.2 Castlebanny and Section 3.3 Templeorum.
KK-C162-286	Catriona Carroll	<p>1. This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.</p> <p>2. St. Moling's Well and St. Moling's Cave should be listed as protected structures.</p>	<p>1.See discussion under Section 3.2 Castlebanny.</p> <p>2. Both St. Moling's Well and Cave are recorded monuments, and are currently not considered for inclusion in the Record of Protected Structures as they are sufficiently protected as archaeological monuments under the National Monument Act 1930.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-287	Christy English	1.This submission relates to the Wind Energy strategy and objects to the proposed changes governing wind turbines for a number of reasons, as it would allow a greater spread of turbines, which would be industrial vandalism.	1. The Council is obliged to prepare a Wind Energy Strategy in compliance with the Government's policy and Guidelines on Renewable Energy. The aim of the Strategy is to identify strategic locations where large scale wind energy would be appropriate, and also identifying areas where heritage and other considerations should be protected from large scale wind energy developments. Such areas are designated as Not Normally permissible. This strategy thereby reduces the spread of turbines across the County. On foot of a number of submissions, see Section 3.1, 3.2, and 3.3 there are a number of proposed changes to the Wind Energy Strategy.
KK-C162-288	Johnny & Mary Phelan	1. This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny. 2. Have concerns about surface water on their land at Ballytarsna, and that this may be exacerbated by any large scale wind energy development.	1. See discussion under Section 3.2 Castlebanny. 2. Measures to deal with surface water as part of any development proposal are set out in Section 10.2.7 of the Draft Plan.
KK-C162-289	Eilis Bergin	Rath Ullard	See submission ref. KK-C162-60
KK-C162-290	Tom Dowling	Rath Ullard	See submission ref. KK-C162-60
KK-C162-291 KK-C162-293	Mark Girling	1. Seek to build upon the social capital that has built up in and around Camphill communities, and enable the development of inclusive neighbourhoods, community led housing and social enterprise and promote the integration of a wide range of household types and people with varying degrees of support needs.	1. This is addressed in Section 6.4, 6.8 and 6.9, Volume 1.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>2.Community led housing pilots especially on rural sites could provide a new way forward for rural innovation</p> <p>3.Objectives and policies of the County Development Plan to be aligned and supportive of the Strategic Plan for Housing Persons with Disability</p> <p>4.Request to include additional text in Section 6.3</p> <p>5.Requested to include additional text in Section 7.1</p> <p>6.Additional policy measures are needed which expressly enable the integration between people of varying support needs (disability, mental health, older people), building on existing social capital and informal support networks.</p>	<p>2.Noted</p> <p>3.Recommendation: Include reference to '<i>Strategic Plan for Housing Persons with Disability</i>' in Section 6.8, Volume 1.</p> <p>4.Recommendation: Include text in Section 6.3 - "<i>In those rural settlements where Camphill communities have developed, the Council seeks to support new initiatives, along the lines of inclusive neighbourhoods, community led housing and social enterprise [through funding policy and planning regulations] to develop and thrive</i>"</p> <p>5.Recommendation: Include text in Section 7.1 - "<i>Where Camphill communities have developed, the Council seeks to support the development of inclusive neighbourhoods, community led housing and social enterprise and promote the integration of a wide range of household types and people with varying degrees of support needs</i>".</p> <p>6.Noted</p>
KK-C162-292	Catherine O'Brien	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-293	Mark Girling	See submission ref. KK-C162-291	
KK-C162-294	Frank O'Keefe	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-295	An Post	<p>1.An Post request that KCC provide a supportive policy framework for the future provision of postal infrastructure</p> <p>2.Inclusion of additional policy to assist in the delivery of future An Post projects in the City and County</p> <p>3.KCC recognise their specific operational requirements i.e. car parking, access and deliveries of An Post.</p> <p>4.Car Parking – May require greater levels of parking spaces including electrical vehicle charging points. Parking also required for staff owned vehicles that travel to An Post facilities and customers collecting mail items. Facilities must be future proofed to ensure long term viability of An Post's operations.</p>	<p>1.Section 2.9, Volume 2 sets out the zoning objectives for Kilkenny City indicating the type of development most appropriate to each land use category. Development of An Post services can be provided for in these objectives.</p> <p>2.The CDP supports all types of enterprises throughout the County and therefore does not specify. Section 5.3.2, Volume 1 sets out objectives to support enterprise and employment in the County whilst Section 3.3.4, Volume 2 refers to the City.</p> <p>3.Chapter 13, Volume 1 sets out the requirements for all development types which must be complied with at application stage.</p> <p>4.Section 12.14, Volume 1 sets out development management requirements for electric vehicle charge points. Table 12.3, Volume 1 set out car parking standards for each land use type. Such standards are applied at the discretion of the Council.</p> <p>5.Noted</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>5.The use of public transport is not an option for employees as shifts start at a time when public transport is not in operation.</p> <p>6.Car parking is required for parking storage areas for the delivery vehicles used to transport mail</p> <p>7.Delivery & Access – Request KCC note for future assessment of planning applications and preparation of planning policy that An Post require access to its premises on a 24 hour basis and therefore any restriction on times of deliveries/collections to/from An Post facilities impacts on its ability to deliver its service</p> <p>8.Request for KCC to engage with An Post should any future plan propose to amend delivery hours in town/city centre locations</p> <p>9.Sufficient level of vehicular access must be maintained and loading bay space provided to accommodate the collection and delivery of mail</p> <p>10.KKC to consult with An Post to ensure sustainable solutions are considered to maintain a sufficient level of access whilst also improving the appearance and function of town centre areas.</p>	<p>6.Noticed</p> <p>7.Noticed</p> <p>8.Noticed</p> <p>9.This is addressed in Section 12.12, Volume 1</p> <p>10.Projects of significance associated with mobility will be subject to the normal statutory consultation process which allows for public comment and engagement prior to decisions being made.</p>
KK-C162-296	Deirdre O'Mahoney	<p>1.Chapter 9 – Request to amend Chapter title to include 'The Arts'</p> <p>2.It is requested the Strategic Aim of Chapter 9 is amended</p>	<p>1.Recommendation: Amend chapter title as follows: Heritage, <i>Culture and The Arts</i></p> <p>2.Recommendation: "To seek the protection and sustainable management of <i>the Arts Culture and</i> heritage of</p>

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		3.Request for inclusion of additional text in Section 9.5	<p>Kilkenny for the benefit of current and future generations; to encourage the collection of knowledge to inform its protection; and to promote access to, awareness of and enjoyment of Heritage <i>Arts; and Culture, to further develop the infrastructure and actively support engagement with communities throughout Kilkenny.</i></p> <p>3.Recommendation: "The Council works to ensure that there is continued support in this sector, not simply for its intrinsic value, but as a driver of major economic <i>and social</i> development. <i>The office will continue to support artists at all stages, taking into account the range and needs of different disciplines and practices. The Office will support the active engagement of diverse audiences in rural and urban Kilkenny through social and collaborative practices."</i></p>
KK-C162-297	Robert Challoner	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-298	Marian Kendrick	1.This submission relates to the Wind Energy Strategy and objects to the change in designation for the hills of South Kilkenny (Owning, Garryduff, Mullinbeg, Templeorum, Harristown) to 'Acceptable in Principle'. See discussion under Section 3.3 Templeorum.	1.See discussion under Section 3.3 Templeorum.
KK-C162-299	Patrick Lydon	1.The submission relates to Paragraph 4.7 – Rural Nodes and to paragraph 7.8 – The submission does not propose specific measures but is intended to encourage the	1.Objective 4J of the draft Plan supports the provision of Services Sites for small towns and villages under Objective 18b of the national Planning Framework. In this regard 22

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		Development Plan to look at the many positive implications of this approach to Rural Nodes that could be facilitated through informed planning policies. "Smart Villages" proposals include, sharing resources in smaller local developments, creating environments that are inclusive, accessible, sustainable and linked to the wider urban and regional developments through high quality broadband services. The inclusion of an objective to promote inclusive rural neighbourhoods in line with the Smart Villages proposals can be included in the County Development Plan.	villages with Social and Engineering Infrastructure have been identified for growth. Small clusters of housing will also be allowed in smaller rural nodes. It is an objective of the plan to prepare design and best practice guidance for the provision of clusters in these settlements. It is envisaged that these clusters will have many if not all of the Smart village attributes referred to in the submission.
KK-C162-300	Patrick Lydon	<p>1.HIQA regulations includes the concept of "Designated Centres" – in which the residential area for people receiving support must be defined and regulated, with many restrictions being imposed on the use of the centres that are designated solely for the support of the residents with disabilities.</p> <p>2.There is a clear conflict between broad development policy in relation to Housing and Community and the restricted regulatory requirements of HIQA. County Development Plan should foster policy and development objectives that will encourage full community inclusion with regard to housing for people with support needs.</p>	1.The HIQA policy is not a matter that can be reviewed in the Development Pan. The plan however supports inclusivity through universal design and Section 6.2 of the Housing Strategy in particular includes an objective to ensure that new housing and development for renewal which includes housing, include a mix of house types with universal design single level living units for people with disability in accordance with Kilkenny's plan for Housing People with Disability, as may be reviewed.
KK-C162-301	Dicksboro GAA Club	1.Dicksboro GAA's ambition is to grow in size in line with the expected population growth in the Western Environs	1.The Club's aspirations for growth and access to playing pitches in the Breaghagh Valley, formerly referred to as the Western Environs, is noted. An extensive area has been

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		<p>and Loughmacask area over the duration of this development plan.</p> <p>2.The Club estimate that it could potentially double in size throughout the lifetime of this development plan and to that end we would welcome any potential opportunity that could be afforded to attain the use of two additional playing pitches in the Western Environs / Loughmacask general area.</p>	<p>earmarked for future Amenity/Open Space and Recreational use within the Breaghagh Valley..</p> <p>These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p> <p>Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breaghagh valley.</p>
KK-C162-302	Gas Networks Ireland	See Section 2A above	
KK-C162-303	Thomas and Nichola Barry	1.This submission relates to the Wind Energy Strategy and objects to the change in designation for the lands in their area (Corbally, Garyduff, Mullenbeg, Harristown, Templeorum). See discussion under Section 3.3 Templeorum.	1. See discussion under Section 3.3 Templeorum.
KK-C162-304	Orlaith Treacy	1.Request to include additional text in Section 9.5	<p>1. Additional text added in Section 9.5 (see KK-C162 296)."</p> <p>2.Recommendation: Include following in Section 9.5.1: <i>Subtitle Film Festival, Rhythm and Roots Music Festival, AKA Festival, Tradfest and Design and Crafts Council of Ireland.</i></p>

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		<p>2.Request to include additional festivals and organisations in Section 9.5.1</p> <p>3.Request to include additional text in Section 9.5</p>	3.The proposed text noted but there is sufficient text already included.
KK-C162-305	PJ Liston	1.Restore Swimming in the River Dinin as it was 30 years ago. The plan should make more use of natural settings of the rivers to make them available for community enjoyment, especially for swimming.	1.The plan already supports the promotion of the natural amenity of the three sister rivers in order to facilitate the development of amenity, recreation, biodiversity and tourism and will work with agencies and communities to improve access to facilities along rivers at appropriate locations, subject to the availability of resources. Smaller tributaries such as the Dinin by implication is included. See section 8.4.1 in this regard. The opening of particular stretches of river for activities a such as swimming is an operational consideration.
KK-C162-306	Charlotte Shilabeer		1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.

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KK-C162-307	Irish Architects Declare	<p>1.Proposal to integrate the 'Green Factor Approach' into planning policy of the CDP. This would address the following strategic issues – Climate Action, Quality Housing and Sustainable Neighbourhoods, Green Infrastructure, Open Space, Recreation and Natural Heritage and Sustainable Environmental Infrastructure and Flood Risk.</p> <p>2.Green Factor Approach will mitigate the effects of development by maintaining sufficient levels of green infrastructure while enhancing the quality of the remaining vegetation</p> <p>3.Integration of the Green Factor Method into the CDP will help set the Council's vision of sustainability into action. It would help reduce the negative impacts of climate change whilst managing flood risk, promoting biodiversity and supporting the creation of attractive and healthy neighbourhoods</p>	<p>1.These issues are adequately addressed throughout the Draft Plan</p> <p>2.Section 9.2.3, Volume 1 refers to Green Infrastructure</p> <p>3.Section 2.4, Volume 1 sets out how climate change is integrated into the Development Plan. Each of the issues are addressed adequately</p>
KK-C162-308	Madeleine Carroll	<p>1.The submission states that modern materials like concrete and steel is not in keeping with our limestone and marble past of Kilkenny city and is also environmentally problematic. The city is losing its identity and becoming a carbon copy of other cities with older buildings are being let rot along with the beautiful wooden shopfronts. Although in private ownership, owners must be held accountable</p>	<p>1.The historic areas of the City are all designated Architectural Conservation Areas (ACAs) in which strict requirements apply in order to ensure that development does not affect the heritage characteristics of the area. The Statement of Character for the ACAs and the Development Management Requirements for ACAs are set out in Section 4.5 of Volume 2 and the Development Management Requirements for shopfronts in Section 13.24 -Section. Transgressions of the Planning Act are Enforceable offences</p>

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			and are dealt with accordingly. Each development proposal is assessed on its own merits against this policy backdrop.
KK-C162-309	David and Deirdre Walsh	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-310	Eoin Smith	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-311	Ciara Ann Smith	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-312	Harmony Solar Ireland Ltd	<p>The submission makes a range of recommendations.</p> <p>1.Recommendation 1: That the Kilkenny City and County Development Plan fully elaborates further on National and International policy for climate change and provision of renewable energy and that the plan includes a firm policy framework that supports renewable energy proposals and recognises the specific development requirements to facilitate large, grid scale renewable energy projects at suitable locations in the county.</p> <p>2.Recommendation 2: That the Kilkenny City and County Development Plan (2021-2027) inserts a specific policy objective which: "Supports utility scale solar PV development at suitable locations where it can be</p>	<p>1.Chapters 2 and 11 (Sections 11.1 and 11.3) sets outs the International, National and Regional Policies related to climate Change. The current references are considered adequate.</p> <p>2.Section 11.8.5.1 already provides for utility scale solar PV. Objective 11C supports the use of all renewable resources to achieve the 2030 target of 100% electricity from renewable resources.</p>

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		<p>demonstrated that there are no significant adverse impacts to landscape or local amenity."</p> <p>3.Recommendation 3: That Kilkenny County Council do not adopt an overly restrictive approach in establishing the acceptable or suitable locations for solar PV developments but rather assess developments on their merits on a case by case basis, following engagement with the Planning Authority at pre-application stage.</p> <p>4.Recommendation 4: Suggests that the following text be amended in Section 11.8.5.1 of Chapter 11: "A decommissioning statement plan should be included as a standard condition attached to a grant of planning permission component of a planning application for utility scale solar PV to be submitted to the Planning Authority three months prior to the decommissioning of the development"</p> <p>5.Recommendation 5: It is for this reason that permissions for a ten-year period is strongly believed to be appropriate and that such proposed developments cannot be thought of as being premature or unreasonable in considering the aforementioned factors. Submission</p>	<p>3.Section 11.8.5 of the plan does not have an overly restrictive approach towards the location of solar PV developments but does state that all development will be assessed on a site-specific basis and goes on to list the considerations for suitable locations for solar developments.</p> <p>4.The current requirement is that a decommissioning statement should accompany the application in the first instance. This is considered reasonable but can amount to a commitment to decommissioning only. The details of the decommissioning can be agreed three months prior to decommissioning.</p> <p>Recommendation: That the text in section 11.8.5.1 be amended to reflect the requirement for a commitment to decommissioning at application stage. A condition to agree decommissioning details will be a consideration during the decision-making process.</p> <p>5.The statutory appropriate period for executing a permission is five years and can be extended. Applicants can however request an extended appropriate period The operational period is a separate consideration and will be considered as part of the application. Long operation</p>

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		<p>requests that future solar PV developments be granted planning permission for an operational period of between 35 – 40 years.</p> <p>6.Recommendation 6: Kilkenny County Council should consider the siting/location of new developments on a case by case basis, recognising that there is a necessity in some instances for larger scale solar developments to be fragmented across a large site area on account of ecological considerations, access requirements, flood related concerns, land suitability, residential amenity considerations and land availability.</p>	<p>periods of 20 to 30 years are also not uncommon. The operational life of the project is conditioned with a decommissioning required after the period.</p> <p>6.The plan does not militate against fragmentation and each application is already considered on its own merit. See Section 11.8.5 and in particular Section 11.8.5 in this regard.</p>
KK-C162-313	Kilkenny County Board	<p>1.The County Board is particularly interested in the provision of suitable full-sized playing pitches in the Western Environs and eager to develop partnerships with the three new schools and recognise the positivity of facilities being sited adjacent to the schools.</p> <p>2.County Board request that provision is made for an appropriate number of full-sized playing pitches adjacent to the proposed new schools in the Western Environs of Kilkenny City Suitable synthetic pitches would be of major</p>	<p>1.The County Boards aspirations for growth and access to playing pitches in the Breaghagh Valley, formerly referred to as the Western Environs, is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breaghagh Valley.</p> <p>These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p>

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		advantage and such a facility is not available in Kilkenny at present. Playing pitches requires should be 90 metres x 145 metres minimum.	Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breaghagh valley.
KK-C162-314	RWE Renewables Ireland Ltd	<p>This submission relates to the Wind Energy Strategy.</p> <p>1.RWE commend Kilkenny County Council on the ambitious target of 100% generation of its electricity needs from renewable sources by 2030 however they seek clarification around the proposed target as there is also mention of 70% target. RWE commend the updated and comprehensive Renewable Energy Strategy (RES).</p> <p>2. RWE asks that the Council account a sufficient area of the county for wind energy development as is appropriate to meet these targets.</p> <p>3. The submission requests that any extracts from the Draft Guidelines on Wind Energy Developments (2019) be removed in anticipation of the final published guidelines this year.</p> <p>4.RWE ask the Council to also consider Large Scale Wind Energy Developments (>5MW) in areas designated as</p>	<p>1 and 2. These targets have been resolved.</p> <p>3. It is appropriate that the Draft Plan refer to any relevant provisions of the Guidelines. References to the Draft Guidelines will be replaced by a reference to the Government's <i>Wind Energy Development Guidelines</i>²³, and any revisions thereof". Once the revised Guidelines are adopted, the Council will review its Strategy to ensure compliance.</p> <p>4. A strategic approach has been taken to the identification of areas for large scale wind energy developments, in line</p>

²³ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

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		<p>'Open to Consideration' as, according to Appendix K, these areas have "no significant conflict with environmental designations or sensitivities", and existing or planned electricity grid capacity should not be considered a constraint for the purposes of determining whether areas of County Kilkenny are suitable or unsuitable for wind energy development.</p> <p>5. RWE do not necessarily agree with Plan statement, "that a typical wind turbine requires a land take of 0.4 hectares, (and) it is clear that notwithstanding the 500m setback criteria from residences, this Strategy provides for sufficient land area." They set out that there are many constraints operating to reduce the area available to wind farms, including setback distances from residences, Natura sites, setback from 110kV overhead lines and existing wind farms, and to allow for a natural attrition rate across development sites and projects. They estimate that an area of 21 ha is needed around a turbine to optimise the wind take.</p>	<p>with the Government's <i>Wind Energy Development Guidelines</i>²⁴. This included identifying the areas of the county most suitable for large scale wind energy developments, based on a number of factors. It is considered prudent to take a strategic approach, and encourage large scale developments into those areas designated as Acceptable in Principle, rather than allowing a widespread dispersal of large-scale developments.</p> <p>5. The Plan stated that a typical wind turbine requires a land take of 0.4 hectares, which referred to the constructed hardstand, not including wind take. This will be clarified in the Plan. See Chapter 11 for a discussion of the capacity of the total area of land designated.</p>
KK-C162-315	Kilkenny Cycling and Walking Campaign	1.The mapping of infrastructural requirements to support the concept of a 10-minute city should be an output of the Local Transport Plan.	1.The Kilkenny Local Transport Plan (KLTP) will produce walking and cycling plans in support of the 10-minute city.

²⁴ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

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		<p>2.KCWCG stress the urgent need for a Cycling Strategy with an overall vision for the city and county incorporating a detailed design of a county-wide cycle network</p> <p>3.A multidisciplinary team should be put in place to lead on the development and delivery of the cycling strategy.</p> <p>4.An Active Travel team should focus solely on the delivery of walking and cycling infrastructure and complementary behaviour change programmes.</p> <p>5.It is appropriate to consider how the city might re-assert pedestrian and cycle ways as the predominant model in its medieval core.</p> <p>6.The submission makes various detailed recommendations for the city centre permanent changes to the city centre, including prioritising pedestrian and cyclist facilities in line with the DMURS and to the standards outlined in the National Cycle Manual.</p> <p>7.Reimagining the back lanes would create a network of cyclist/pedestrian routes, showcasing the built heritage of the city and creating shared spaces for economic, cultural and social activities.</p> <p>8.KCWCG welcome the vision for the Abbey Quarter as an inclusive place for an inter-generational community to work, live and play.</p> <p>9.Consideration might also be given to constructing a further pedestrian bridge beyond Brett's sawmill on the</p>	<p>2.The Plan contains an objective to produce a cycling strategy for the City through the Kilkenny Local Transport Plan. There are also policies to enhance cycling within the County..</p> <p>3. A suitable project team will be formed to deliver the project.</p> <p>4.This will be an operational matter for the Council.</p> <p>5.The Local Transport Plan will include a traffic Management plan for the city centre.</p> <p>6.The longer-term traffic management arrangements for the City Centre will be addressed in the Kilkenny City Transport Plan and as project evolve there will be further opportunities for engagement on the specific details of the projects.</p> <p>7.The Backlanes have already been considered in the recent Kilkenny Cycling study and will be further addressed in the Cycling Plan for the city to be contained in the Kilkenny City Local Transport Plan.</p> <p>8.Noted.</p>

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		<p>Sion Road to allow full off-road access to the Kilkenny-Bennetsbridge Nore Walk, without diverting people onto the Sion Road.</p> <p>10.The City Nore Spinal Route should include:</p> <ul style="list-style-type: none"> • The widening of the existing path and boardwalk and the separation of cyclist and pedestrian facilities where possible. • Installation of raised area at Johns Bridge to slow oncoming traffic and thus allow cyclists and pedestrians to cross safely. • Enhanced access at Johns bridge to the bank at the Rivercourt Hotel. • Access through St Canices hospital to the Old Dublin Road and access from the viewing point on Dublin Road to below the Lacken steps. <p>11.Supports the provision of an additional pedestrian bridge between Ossory Bridge and John's Bridge to connect St. Canice's campus to the Canal Walk</p> <p>12.Supports the provision of a pedestrian bridge at Talbotsinch</p>	<p>9. In the longer term as the River Nore Linear Park develops consideration of such infrastructure could be given. However in the time frame of this plan such an objetvie is considered to be aspirational.</p> <p>10.The proposals for the Spinal route will be considered in the Kilkenny Walking and Cycling plans to be contained in the Kilkenny city Local Transport Plan.</p> <p>This is a traffic management issue and not a matter for the development plan.</p> <p>The lands at Rivercourt Hotel are in private ownership and pedestrian access is already available.</p> <p>The Council will work with the Health Services Executive to do a Masterplan for the St. Canice's land in accordance with objective Z4 and Section 2.4.1. The matters raised will be considered in the plan.</p> <p>11.The Plan proposes an indicative future pedestrian crossing point across the River Nore at the Canal walk halfway</p>

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		<p>13.The construction of a Boardwalk with cyclist provision at Greensbridge to link the River Nore Riverside Walk with the new Riverside Linear Park in the Abbey Quarter.</p> <p>14.A pedestrian/cyclist bridge alongside Greens Bridge to join both banks, possibly as part of a restoration of Greens Bridge.</p> <p>15.The provision of an additional bridge, south of Ossory bridge with access to Sion Rd and Bennetsbridge Road, overcoming severance of the Ring Road and providing access to industrial parks while also completing a circular route along the river.</p> <p>16.Include in P93 Objective C6M: To develop access along the eastern bank of the river up from Greensbridge, to the proposed bio-diversity park at Dunmore as part of the River Nore Linear Park as opportunities arise and resources permit and link with the proposed pedestrian bridge at Talbots Inch.</p> <p>17.Segregation of radial routes into city centre with cyclist provision to continue through all junctions on routes and particular works on various routes in the city.</p> <p>18.The roundabouts on the ring road have been identified as major severance points. Cyclist provision needs to</p>	<p>between the Ossory bridge and John's bridge. See Objective C5Q.</p> <p>12.The Plan proposes an indicative future pedestrian crossing point across the River Nore at Talbotsinch. See objective C5O.</p> <p>13.The plan proposes a Boardwalk at Greensbridge to link the Riverside Walk and the New riverside Walk in the abbey Quarter. See objective C5P.</p> <p>14.See objective C5P above which addresses the construction of a boardwalk at Greensbridge.</p> <p>15.It is considered that an additional bridge beyond Ossory Bridge which will militate against the achievement of Compact Growth and the 10-minute city as envisaged by the Plan by further aiding urban sprawl.</p> <p>16.Recommendation: Include in objective C6M (add text) below: <i>"To develop access along the eastern bank of the river up from Greensbridge, to the proposed bio-diversity park at Dunmore as part of the River Nore Linear Park as opportunities arise and resources permit and link with the proposed pedestrian bridge at Talbots Inch."</i></p>

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		<p>incorporated at all roundabouts in line with the National Cycle Manual.</p> <p>19.All roundabouts within the ring road should be reduced to single lane entries with Dutch style treatment for cyclists where possible and all in line with the National Cycle Manual.</p> <p>20.All schools in the city and county should be considered for a Safe School Zone to reduce traffic speed and volumes at school gates or eliminate where possible through School Streets.</p> <p>21.Provision of Park and Ride Locations with provision of Cycling Lockers and/or covered bike parking at identified sites on the approach roads.</p> <p>22.Bike parking and shower facilities should be incorporated into all new office spaces for commuters</p> <p>23.Secure bike parking should be provided, similar to other cities, with electric charging points for E-bikes</p> <p>24.All Bike Parking should be close to entrances and in full view and provided at shops, medical centres, government buildings</p> <p>25.A Bike Park or Pump Track is required for the city</p>	<p>17.This is a traffic management issue and will be addressed in the Kilkenny City Local Transport Plan.</p> <p>18.This is a traffic management issue and will be considered in the Cycling plan to be contained in the Kilkenny City Local Transport Plan.</p> <p>19.This is a traffic management issue and will be considered in the Cycling plan to be contained the Kilkenny City Local Transport Plan.</p> <p>20.This is a traffic management issue and will be addressed in the Kilkenny City Local Transport Plan.</p> <p>21.This is a traffic management issue and will be addressed in the Kilkenny City Local Transport Plan.</p> <p>22.See Development Management Requirement vi. in Section 12.5.1</p> <p>23.Cycle parking is required through development management requirements and the Council provides cycle</p>

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		<p>26. Explore the following routes as potential for Rothar Roads / Greenways at:</p> <ul style="list-style-type: none"> • Kilkenny to Inistioge Greenway - linking Bennetsbridge, Thomastown and Inistioge to the City and to the Greenway in New Ross to the South. • Kilkenny to Castlecomer Greenway - linking Kilkenny, Ballyragget and Castlecomer • Old Waterford Road, Knocktopher and Mullinavat to link to the Waterford Greenway 	<p>parking in public realm areas. A comprehensive cycle strategy will be prepared as part of the Kilkenny Local Transport Plan.</p> <p>24. These will be considered on a case by case basis when considering applications for development.</p> <p>25. Following completion of the Local Transport Plan projects will follow to implement the cycle provisions which can at that stage include for the necessary details.</p> <p>26. The development of additional linkages in the County is supported by the Council.</p> <p>Recommendation: Insert supporting text in Section 8.4 <i>"The Council will investigate the potential of developing a Greenway from Kilkenny to Castlecomer and Ballyragget and onwards to Portlaoise as part of the development of Greenways and Blueways within the County (see submission KKC162-20)</i></p>
KK-C162-316	Rosie Lynch	1. Request to include additional strategic objective in Section 6.2	<p>1. Recommendation: Include additional strategic objective – <i>"To ensure that people are at the centre of all placemaking activities. To ensure that co-design and participatory processes are used to engage people in shaping their built-environment, with a particular focus on supporting harder to reach communities to take part in public engagement processes."</i></p>

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		<p>2.Request to include additional housing objective in Section 6.9</p> <p>3.Request to include additional text to opening paragraph of Section 6.3</p> <p>4.Include additional text in Section 7.1</p> <p>5.Include additional text in Section 8.1</p>	<p>2.Recommendation: Include additional housing objective – <i>"Acknowledgement and associated support of Community-Led Housing as a means of empowering communities to meet their specific housing needs affordably and collectively."</i></p> <p>Recommendation: Include following text in Section 6.3 – <i>" In those rural settlements where Camphill communities have developed, the Council seeks to support new initiatives, along the lines of inclusive neighbourhoods, community-led housing and social enterprise [through funding policy and planning regulations] to develop and thrive"</i></p> <p>4.Recommendation: Amend text in Section 7.1 as follows – Maintain and enhance the existing rural community to ensure vibrant sustainable rural areas. <i>In those rural settlements where Camphill communities have developed, the Council seeks to support new initiatives, along the lines of inclusive neighbourhoods, community-led housing, cultural amenities and social enterprise [through funding policy and planning regulations] to develop and thrive.</i></p> <p>5.Recommendation: Amend text in Section 8.1 as follows – <i>To ensure that people are at the centre of all open-space and recreation opportunities and activities. To ensure that co-design and participatory processes are used to engage people in shaping their built-environment, with a particular focus on supporting harder to reach communities to take part in public engagement processes.</i></p>

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KK-C162-317	Rosie Lynch	<p>1.Request to amend title of Chapter 9</p> <p>2.Include an additional text to Strategic Aim of Chapter 9</p> <p>3.Section 9.5.1 needs to reflect the breadth of arts and cultural organisations in the county and outside the city.</p> <p>4.Amend text in Section 9.5.1</p> <p>5.Request to include additional strategic objective in Section 9.5.2</p>	<p>1.Recommendation: Amend title of Chapter 9 as follows – <i>Heritage, Culture and Arts</i></p> <p>2.Recommendation: Revise text of strategic aim as follows: <i>"To seek the protection and sustainable management of the Arts Culture and heritage of Kilkenny for the benefit of current and future generations; to encourage the collection of knowledge to inform its protection; and to promote access to, awareness of and enjoyment of Heritage Arts; and Culture, to further develop the infrastructure and actively support engagement with communities throughout Kilkenny.</i></p> <p>3.This is now addressed due to recommended changes from Submission Ref. KK-C162-304</p> <p>4.Recommendation: Text in Section 9.5.1 has been amended to show the breath od arts and cultural organisations in the City & County. (See KK-C162-304)</p> <p>5.Support for the development of arts infrastructure county-wide, is included within the revised Strategic aim."</p>

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KK-C162-318	Ballyragget Community Hall	<p>1.Create biodiversity along roads and protect vulnerable properties along the floodplains</p> <p>2.Rollout better broadband in Ballyragget.</p> <p>3.Provide more opportunities for extracurricular activities and social engagement in Ballyragget</p> <p>4.Action to reduce the number of uninhabited and derelict premises in the town</p> <p>5.The submission makes other recommendations for Ballyragget dealing with economic development of the town and tourism, traffic management in the town, litter control, street lights, traffic calming, dog fouling, signage, requirement for a health centre, Garda presence, the potential to develop the Nore as an amenity, heritage of farming, cycling routes around the town, river walk, looped walk around the green, preservation of historic graveyard, bridges etc, additional tree planting, Infrastructure requirements,</p> <p>6.The submission supports renewable energy, alternative energy group schemes and green living.</p>	<p>Ballyragget is one of 22 settlements identified in the Core Strategy as having a settlement boundary within which the Council will support economic development, services, town renewal and serviced sites. Section 4.6 sets out the approach that will be followed for these settlements. Ballyragget already had a health check done under the town and village renewal scheme. Kilkenny County Council and Kilkenny Leader Partnership are currently in discussions with various Ballyragget community groups to, under the Town & Village Renewal Scheme, put Ballyragget forward for the next round of Community Health Checks and to establish a town team and undertake a town plan. The detailed town specific issues raised in the submission are not issues to be addressed at County Plan level, but should form part of the town plan and will form part of a package of issues that the Council will generally assist with and help with applying for funding.</p> <p>Recommendation: Include the following Objective 4 M in Chapter 4 <i>"To support the recommendations of the town plans compiled under the Town and Village Renewal Scheme subject compliance with the provisions of the Habitats and Birds Directives and subject to the availability of funding."</i></p>
KK-C162-319	ESB	See Sectuion 2A above	
KK-C162-320	Shane Alyward	1.The submission raises two issues with section 7.8.4 Rural Housing.	1 & 2 The policy is intended to facilitate those people who are an intrinsic part of the rural community through

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>2.The criteria state full time engaged in agriculture etc., this does not allow for part time/ small farming enterprises.</p> <p>3.This criterion states the applicant cannot previous have owned a rural house. This is discriminatory and does not allow a person engage in agriculture if the opportunity arose. If a person was living in a rural area and the opportunity came to purchase a farm they will not be able to construct a house on this farm.</p>	<p>their economic activity and/or local connection. It is not exclusively for full time farmers. People who are parttime farmers and are from the area will qualify for consideration for a rural dwelling.</p> <p>3. The rural housing policy is deigned to satisfy the demand from people who have a rural generated housing need and who are endeavouring to satisfy that need for the first time. The provision is intended to manage to extent for rural house provision and development of new dwellings in the countryside.</p>
KK-C162-321	Conor Foley	1.Request to retain policy in Section 8.2.13 of 2014-2020 County Development Plan in relation to noise control	1.This policy is included in Section 10.2.2.1 Noise Control of the Draft Kilkenny City and County Development Plan 2021-2027
KK-C162-322	Natural Forces Renewable Energy Ireland	<p>This submission relates to the Wind Energy Strategy.</p> <p>1.NFRE work with communities to develop renewable energy generators in their area, and the Small-Scale category of wind energy development is the most relevant to these communities. NFRE seek to remove the 65m hub height limit for small scale projects. They cite the current Renewable Energy Support Scheme which has a specific community category, for which the threshold generation is less than 5MW. NFRE propose that the Draft Plan mirror this by using 5MW as the threshold, not a height limit. Modern turbine technology requires only one turbine to achieve an optimal MW (but remain less than 5MW). A 65m</p>	<p>1.The Wind Energy strategy divides the county into three policy areas, and also categorises wind energy developments by their scale. In order to take a strategic approach, larger scale developments are only permissible in a smaller geographical area; the "Acceptable in Principle" area. Smaller scale projects, due to their reduced impact, will be considered in both the "Acceptable in Principle" and the "Open for Consideration" areas. In order for such community projects to be considered more widely across the county, it is necessary to apply a scale threshold. Any communities</p>

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		hub height limit will mean communities will need to build more turbines.	within the "Acceptable in Principle" areas may apply for larger turbines.
KK-C162-323	Michael Bookle	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-324	Andy Murphy	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-325	Christine & Gerard Byrne	<p>1.The submission includes a request for rezoning of lands at Kilcreene lodge for 'New Residential'. Three distinct planning units within the overall Kilcreene lands. (Sites A, B and C). The overall lands have two separate zoning objectives.</p> <p>2.Site A (2.02Ha) was zoned for 'Phase 2 Residential' and in the draft is proposed 'Amenity / Green Links / Biodiversity Conservation / Open Spaces / Recreation'. Site A has permission for 9 sites under permission Reg. Ref. 18/856. The submissions state the applicant will shortly be lodging a planning application for the individual house types for the nine sites.</p> <p>3.Site B (0.78Ha) and C are zoned for 'Amenity / Green Links / Biodiversity Conservation / Open Spaces / Recreation'.</p> <p>4.It is requested that sites A and B be rezoned for "New Residential".</p> <p>5.Site C relates to the existing derelict outbuildings associated with Kilcreene Lodge. It is proposed that a</p>	1. Recommendation: It is proposed to zone the area (A) which is subject to the outline permission ref 18/856 for existing residential and provide for a site-specific objective Z13 for restoration of out building for residential use subject to the normal development management criteria.

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		<p>Specific Local Objective is placed in that area of the site to provide for the renovation and extension of the derelict outbuildings to provide for two residential units.</p> <p>6.The submission discusses the site in the context of the Loughmacask Masterplan, which includes 25.84 ha of land zoned for 'New Residential' development, which has the potential to deliver 904 housing units.</p> <p>7.The proposed zoning is considered in the context of the Appropriate Assessment Screening conducted as part of a previous application for site A, Reg. Ref. 18/856, the Flood Risk Assessment and Archaeological Impact Assessment which accompanied the application.</p> <p>8.In combination with zoning sites A and B to 'New Residential', it is proposed that an objective be inserted stating 'The Council will support the sensitive redevelopment of the derelict outbuildings associated with Kilcreene Lodge (Protected Structure) to bring them back into use by providing for residential accommodation which is sensitive to the character and integrity of the site.'</p> <p>9.The sites have extant permissions, are within the 20minute city and close to social infrastructure and supports sustainable mobility.</p> <p>10.The submission includes a justification in terms of the core Strategy Housing demand and concludes that there is ample headroom available to rezone the subject site.</p>	

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-326	David Tennyson	<p>1.This submission relates to the Wind Energy Strategy and states that he is interested in developing a wind farm in the area of Ballyvoole Inistioge. This area is designated as Acceptable in Principle in the Draft Wind Energy Strategy and the submission outlines that the area is suitable for wind energy development for a number of reasons including:</p> <ul style="list-style-type: none"> • General Environmental and Planning Suitability • Planning Precedent <p>2.Available Grid Capacity</p>	1.Noticed. It is proposed to retain this area's designation as Acceptable in Principle.
KK-C162-327	Freshford Garages Ltd	<p>1.Request for Freshford settlement boundary to be altered to facilitate reconfiguration of site to facilitate existing business on the site and future expansion as well as serviced sites.</p> <p>2.Applicant is willing to provide parking for users of the public park and proposal would enable provision of public footpath along the southern boundary.</p> <p>3.Site B is a greenfield site. To the East of the settlement. Proposal to be developed for serviced sites</p> <p>4.Request for 50kph speed limit on R693 to be moved out as far as cemetery</p>	<p>1.Recommendation: Extend settlement boundary of Freshford to include Site A as denoted in submission.</p> <p>2.Noticed</p> <p>3.Site B is situated a considerable distance from the settlement core of Freshford and therefore will not be included as part of the settlement boundary</p> <p>4.This request cannot be achieved under the remit of the CDP process</p>
KK-C162-328	Martin Rochford	1.Request for KCC to adopt and enforce a policy that hedgerows be cut no lower than 1.5m, ideally be left at 2m	1.Section 9.2.5.1, Volume 1 set out policy and objectives to support the protection of hedgerows in the event of

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		or more. Away from roadways trees should be uncut in hedgerows, just some side trimming where necessary.	development proposlas The maintenance and control of hedgerows is not a development plan function.
KK-C162-329	Monica Mullen	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-330	Irish Water	See Section 2A above	
KK-C162-331	Tesco Ireland	<p>1.Tesco Ireland is one of the primary convenience retailers in Ireland. Tesco is keen on investing in the county at appropriate locations. The submission is made to highlight the requirements of modern convenience retail operators such as Tesco</p> <p>2.Given the predicted growth of Kilkenny there could be retail leakage and Kilkenny County Council should provide policies and objectives as part of the Development Plan to spur new retail investment in the Kilkenny City area.</p> <p>3.Tesco did a retail comparison between Kilkenny and other towns and concluded that Kilkenny has fewer retail convenience stores than some smaller settlements such as Athlone and Killarney, whilst it has the same number of stores as Mullingar, which has a population that is c. 20% smaller than Kilkenny City.</p>	<p>1. The position of Tesco is noted</p> <p>2. While leaking to other centres can be a challenge the Planning Authority considers that challenge to retailing and town centre vitality and vibrancy should not be focused on leakage but should be focused on a more holistic approach to the town centre as identified in the town centre first polices in this plan and by national policy.</p> <p>3.The comparison between Kilkenny and the towns identified is simplistic in nature focusing just on simple ratios of number of convenience units to total population. This is a very limited comparison. A more detailed comparison was carried in the retail study which showed that Kilkenny sits healthily alongside its nearby competition.</p>

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		<p>4. There are a number of potential development sites in Kilkenny City for retailing including the Former Mart Site and Abbey Quarter, both of which are appropriately zoned 'general business' and centrally located.</p> <p>5. The Local Authority appears to be placing an over-reliance on the Abbey Quarter in terms of retail phasing. This could delay the provision of retail development at the Mart site. It is, therefore, submitted that there is no requirement for the additional retail phasing restrictions set out in Policy 14.</p>	<p>4. The City & County development Plan has a retail strategy that is aligned with the City & County core strategy and complies with Retail Planning Guidelines 2012.</p> <p>In line with the Government's Town Centre first policy the Core retail area is given primacy for retail development. Opportunity sites for retail development are identified in the City centre which are the Abbey Quarter, McDonagh Junction and the former Mart Site.</p> <p>5. Given the location size and extent of the Mart site a requirement for a masterplan is an objective of the Plan. That master plan process can be provided jointly with the developer and Local Authority. These objectives fully support the provision of retailing for an expanding City.</p> <p>It should also be remembered that the majority of the residential development will take place in the Breaghagh Valley and Loughmacask master plan areas which in themselves will contain appropriate retailing at neighbourhood scale.</p> <p>Recommendation</p> <p>Having regard to the masterplan requirement and the process associated with its delivery and the mix of uses identified it is considered reasonable to omit the phasing requirements of the plan for retailing and allow development proposals in the context of the any provisions of the Masterplan and conforming to the other Development Plan policies and the requirements of the Retailing Planning Guidelines. Omit</p>

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		<p>6.The submission sets out the requirements for convenience retailers such as extensive open areas of floorspace with associated car parking and provision for large goods vehicles. This typically requires large unobstructed and level floorplates, including back of house facilities.</p> <p>7.It is requested that the policies in the forthcoming Development Plan recognise that the design of modern retail formats are dictated by retailer's requirements, current Building Regulations, Fire Safety and Disability Access requirements. In this regard, policies which provide flexibility and allow for the development of modern convenience retail units should be included.</p> <p>8.It is requested that the plan:</p> <ul style="list-style-type: none"> • Allocate adequate convenience retail floorspace to Kilkenny City and that appropriate lands be zoned for such development without restrictive phasing requirements. • It is also submitted that more flexible zoning should be provided to allow for sites to come forward over the life of the proposed Plan. • Include policies and objectives that can spur investment in the convenience retail sector and provide for adequate convenience floorspace to be allocated in settlements across the county. 	<p>reference to Phase 1 and Phase 2 in Retail policies page 40 Vol2.</p> <p>6. The retailing landscape is changing particularly with the advancement of online shopping, click & collect and direct deliveries. With this in mind it is considered that the spatial requirements for retailing will evolve in the short to medium term. Not considered advisable to align to one particular format.</p> <p>7.The Plan does not allocate a particular quantum of convenience retail floorspace to the County. The zoning provision is flexible within the core area and the opportunity sites identified.</p> <p>Recommendation:</p> <p>Change Policy 14 from: The Abbey Quarter will be the focus for city centre expansion (including convenience and comparison retailing) in the City & Environs over the plan period and City Centre expansion shall take place in a phased approach. The following phasing of development lands for retail within the City & Environs is proposed: Retail Phase 1: Abbey Quarter and, at an appropriate scale, MacDonagh Junction; Retail Phase 2: The former mart site at the Castlecomer Road.</p>

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			<p>The release of phase 2 lands for major retailing will only be considered where either planning permission is granted and/or the local authority is satisfied that, significant expansion has already occurred on the phase 1 lands and that any additional retailing on the phase 2 lands will not have a negative impact on the vitality or viability of the retail core or other centre. It is considered that the definition of major retail expansion for the purposes of this section of the City & Environs is 1,000 sqm for convenience goods and 2,000 sq. m for comparison goods.</p> <p>To: In line with the sequential approach of the Retail Planning guidelines the first-choice location for significant retail development is the Abbey Quarter followed by McDonagh Junction and then the former Mart site.</p> <p>See also submission KK-C162-269.</p>
KK-C162-332	McCutcheon Halley Planning on behalf of Glenveagh Properties	<p>1.The submission is made in relation to a site on the Granges Road measuring 3.34 ha (8 acres).</p> <p>2.The submission seeks an alteration to Open Space requirements to provide for 15% in green field areas and 10% on brownfield sites.</p> <p>3.It also seeks changes to the car parking requirements of the Plan.</p>	<p>1.While the quantative standard in the Draft Development is in excess of that quoted in the Sustainable Residential</p> <p>2.Development in Urban Area Guidelines 2009 there is sufficient flexibility in the Draft Plan to allow for reduction in the quantity should sufficient quality of design is provided (See page 256 Vol 1)</p> <p>3.The Car Parking requirements will be reviewed as part of the Local Transport Plan.</p> <p>4.The lands are zoned residential in the Draft Plan.</p>

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		4.Retaining residentially zoned lands that are deliverable accessible and consolidate existing and approved development.	Recommendation: No Change
KK-C162-333	Aiden Clancy	1.Proposal for a pedestrian and cycle bridge at Aughmalogue Bridge considered for inclusion in the Kilkenny City Development plan.	1.Aughmalogue bridge is located within the City boundary. The local Transport plan will deal with cycling and walking strategy. Also Objectvie C5C is to map and identify infrastructural requirements to support the '10-minute' city concept within the City which will identify the requirements in this area. .
KK-C162-334	Lucy Glendinning	1.The Dairy industry should not be continuing on its current course of growth as the average dairy farm emits three and a half times more greenhouse gasses than the average for beef farms, average greenhouse gas emissions from dairy farms have grown by almost 18% since 2012, there is a large number of unwanted calves and ethical issues with breastmilk substitutes exported.	1.The Plan supports Food wise 2025 as contained in Section 5.4 of the National Planning Framework as it strives to achieve sustainable farming practices and the sustainable growth in the farming sector. The imposition of a dairy quota as such is not a matter for the Plan.
KK-C162-335	Mark O' Duffy	See submission ref. KK-C162-60	
KK-C162-336	Bord na Móna	1.The Council should stand positioned to support appropriate commercial and industrial development on Bord na Móna's land. 2.There are several proposals for amenity development along the old bog railway and this can be positively integrated into the cutaway landscape without significant trade-offs to the other ecosystem services (climate, biodiversity, water).	1.Chapter 7, Volume 1 sets out policy and objectives to support to manage rural change and guide development to strengthen the rural economy. 2.Support for the protection of the railway line for amenity is addressed in Section 8.4, Volume 1.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>3.Baunmore Bog has been selected to be part of a project to establish and accelerate the development of native woodland that would have climate action benefits and provide significant new habitat for a wide range of species.</p> <p>4.Bord na Móna request that the importance that cutaway bogs have in terms of renewable energy generation is recognised.</p> <p>5.These lands are prime sites for the development of large scale renewable energy projects and this should be reflected in the finalised CDP to ensure consistency with the objectives and policies of existing National and Regional Plans.</p> <p>6.Peatland rehabilitation and re-wetting has other eco-system benefits, including water quality of the downstream catchments.</p> <p>7.Investment in grid development in remote or rural areas could have a twofold benefit:</p> <ul style="list-style-type: none"> • Providing grid access for the most efficient renewable projects; and • Developing grid access to a level suitable for large demand outside of the 5 main cities. <p>8.Given advances in turbine technologies that the SEAI Wind Atlas or any similar general wind resource data should not be used as a constraint for zoning areas for renewable</p>	<p>3.Recommendation: Reference to this will be included in Section 9.2.8 Peatlands.</p> <p>4. The Bruckana wind farm in the northeast of the county is located on Templetohy bog.</p> <p>5.The land in the ownership of Bord na Móna; Templetohy, Derryville and Baunmore Bogs, are all located in the northwest of the county. In the Draft Wind Energy strategy some of this area was designated as "Open for Consideration". Recommendation: The area of the Bruckana wind farm, on Templetohy bog, will be changed to "Acceptable in Principle". The area of Baunmore is located in an area designated as Open for Consideration.</p> <p>6.Noted</p> <p>7.Noted</p> <p>8. The formulation of the Wind Energy Strategy followed the methodology as set out in the Guidelines, which states as Step 1: "Assess the areas of wind potential ranging from areas with extensive wind energy resources to lesser wind resources using SEAI's Wind Atlas for Ireland."</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>energy development and should be considered on a case by case basis.</p> <p>9.Bord na Mona requests the Landscape Character Assessment is reviewed to ensure a consistent approach to the determination of lands that are suitable for the development of wind energy projects in the County.</p> <p>10.Bord na Mona noted the Draft Plan relies on the requirements of the Revised Draft Wind Energy Development Guidelines (2019) which have not yet been adopted. It is suggested the finalised Plan should not directly rely on the detail of these Guidelines. Additional text to this effect is suggested.</p>	<p>9. The Landscape Character Assessment was carried out by CAAS consultants in 2003. Section 9.2.12 Landscape sets out the national context for landscape assessment. Recommendation: This section will be amended to reflect the publication of the National Landscape Strategy. One of the recommendations of the NLS is to develop a National Landscape Character Assessment, and once that is completed the Council will review its own LCA to ensure compliance.</p> <p>10.Recommendation: Inclusion of text as follows – <i>All planning applications for wind energy developments shall be assessed against the DEHLG's publication Wind Energy Development Guidelines, 2006, (and any subsequent update of these guidelines) and the County Council's Wind Strategy.</i></p>
KK-C162-337	Ann Marie and Barrie Garbutt	1.This submission relates to the Wind Energy Strategy and objects to the change in designation for lands in their community (Corbally, Garyduff, Mullenbeg, Harristown, Templeorum) to 'Acceptable in Principle'.	1. See discussion under Section 3.3 Templeorum.
KK-C162-338	Shane Aylward	<p>1.Kilmoganny settlement boundary is very restrictive and does not take into account the GAA pitch.</p> <p>2.Potential development land with direct access to Church Street to be included in the boundary.</p>	<p>1.Kilmoganny GAA pitch is located a considerable distance from the main settlement core of Kilmoganny and therefore will not be included in the revised settlement boundary.</p> <p>2. The lands proposed are located off the main street and with additional lands provide an opportunity for placemaking.</p>

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			Recommendation: Include lands as requested and one additional field within the revised settlement boundary
KK-C162-339	Kilree Partnership	<p>1.Kilree partnership requests that the lands of the Primary Healthcare Centre adjacent to the Newpark Shopping Centre not be rezoned.</p> <p>2.The Primary Care Centre (PCC) will be a complementary facility to the existing and well-established Newpark Shopping Centre</p> <p>3.Demand has not increased to justify the change in zoning. It would be contrary to the retail planning guidelines which are in place to safeguard neighbourhood centres in development plans.</p> <p>4.Retail objective 5U states "To ensure a town centre first approach is adopted...</p> <p>5.There is no justification for reducing the area of land zoned for Amenity/Green links/Biodiversity conservation/ Open Space/Recreation uses.</p>	The response and recommendation to this submission is provided for under KK-162-342 below as both submissions are considered to be regarding the same topic.
KK-C162-340	Mark Anthony McGrath	1.This submission relates to the Wind Energy Strategy and objects to the change in designation for lands in their community (Glenbower Wood/Mullenbeg, Garryduff Wood, Blackbog, Owning Hill and through the Lingaun Valley and Templeorum) to 'Acceptable in Principle'. See discussion under Section 3.1 Lingaun Valley and 3.3 Templeorum.	1.See discussion under Section 3.1 Lingaun Valley and Section 3.3 Templeorum.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>2.Chapter 11 of the Draft Development Plan has only a couple of paragraphs and a very poor quality map relating to wind energy.</p> <p>3.It was stated at one of the online events that CAAS consultancy carried out the Landscape Sensitivity; have they decided that the entire area of South Kilkenny was no longer unsuitable for windfarm development?</p> <p>4.In the event that a large-scale wind farm development is being assessed by the Bord, what regulations pertain to this assessment?</p>	<p>2.Chapter 11 of the Draft Plan contains the policies and development management guidance for wind energy developments. The Wind Energy Strategy is contained in Appendix K. The map is deliberately printed at A4 scale in the Draft Plan to reflect the fact that these are broad policy areas and do not necessarily relate to lines on the ground.</p> <p>3. As set out in Appendix K, a Landscape Character assessment was carried out by CAAS in 2003, and this identified areas of extreme landscape sensitivity; these have been designated as Not Normally Permissible. The LCA also identified sensitive landscape features; these are now being added to the Wind Strategy, see Section 3 Wind Energy Strategy.</p> <p>4. In the event that an application is being assessed by An Bord Pleanála, either as Strategic Infrastructure or through an appeal, the Bord must have regard to the Government Guidelines, and also to the Planning Authority's Development Plan policy.</p>
KK-C162-341	Vanessa Liston	<p>Biodiversity</p> <p>1.Inclusion of an objective to contribute, to the maximum extent possible, our share of the national commitment to protect 30% of the Earth's lands and seas by the end of the decade.</p> <p>2.The Draft Plan should aim to align with the expected level of ambition in the new National Biodiversity Action Plan.</p>	<p>1.As stated in Section 2.3, Volume 1 KCC Local Adaptation Strategy forms part of the National Adaptation Framework</p> <p>2.Section 9.1 sets out policy supporting the National Biodiversity Action Plan</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>3.Objective 2H be amended to align with the national target of 7% reduction per annum and what areas it will be measured.</p> <p>4.Objective 2G be amended to include targets of how much and by when</p> <p>5.The Draft Plan is an opportunity to include a policy on pursuing low carbon and sustainable materials for development</p> <p>6.Request to include an objective to build on the outcomes and learnings from the new decarbonisation zones pilots.</p> <p>7.Request to include a specific objective to incorporate new methodologies, data and insights as they become available and use to adapt actions to achieve climate, biodiversity recovery and land protection targets.</p> <p>8.Request for the Plan to include a reference to a heritage-led approach to town centre development as well as the Town centre first approach.</p> <p>9.The Plan should have stronger objectives to ensure all policies and plans do not negatively impact on minority ethnic communities.</p> <p>10.Draft Plan to include an objective on equality proofing the Draft Plan and all planning related proposals and policies.</p>	<p>3. The Development Plan is set out to deliver the National targets at local level. National Targets may change over time and there will also be a requirement to prepare Local Climate Action Plans where it it would be more appropriate to define climate change taregts.</p> <p>4.This is addressed in Kilkenny County Council Climate Change Adaptation Strategy 2019-2024²⁵</p> <p>5. In section 11.12.4 change the first bullet point to read as follows: <i>The Planning Authority will through the development management process promote the use of low carbon footprint materials to reduce transport emissions in the sector instead of those that require intense high temperature and carbon emissions.</i></p> <p>6.Recommendation: A section on decarbonisation zones will be included to Chapter 11.</p> <p>7.Section 1.8, Volume 1 sets out how the Plan will be monitored and reviewed over the 6-year period of the Plan.</p>

²⁵ <https://www.kilkennycoco.ie/eng/Services/Environment/Climate-Change/Climate-Change-Adaptation-Strategy-2019-2024/Climate-Change-Adaptation-Strategy.pdf>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>11.Incorporate an objective in Chapter 6 to adopt the Gunning Principles in all engagements.</p> <p>12.Section 9.2.5 – Inclusion for request of Tree Management Plans to ensure trees are strongly protected during development according to BS standards and ensure trees are incorporated into the design of new developments.</p> <p>13.Section 9.2.5 – Include text to mandate the protection and preservation of existing hedgerows in new development. Ensure the highest standard methodology is used for the assessment, removal and protection of the hedgerow and seek their replacement with new hedgerow.</p> <p>14.Include requirement that where trees are removed they must be replaced in suitable locations at a ratio of 4:1.</p> <p>15.Include an objective for the development of tree planting policy for the County.</p> <p>16.Request for EIA to be prepared where a development would have a significant impact on a rare and threatened species.</p> <p>17.Assessment of planning applications for the impact on natural heritage and wildlife and protected species must be significantly strengthened as a core objective of the Plan.</p> <p>18.Include objectives around connecting parks and opens spaces via green corridors.</p>	<p>8.Policy and objectives for the protection of heritage is set out in Volume 1, Section 9.3 and Volume 2, Section 3.4.5 and 4.4. All development proposals must adhere to these policies and objectives</p> <p>9.The Plan is inclusive off all groups and does not negatively impact upon any minority communities as outlined in Section 6.15, Volume 1.</p> <p>11.Public consultation is carried out by the Council with the aim of reaching as many people and garnering as many views as possible. The Council is always seeking new ways to consult.</p> <p>12.Tree management on construction sites is addressed in Section 9.2.5.1 and 13.29, Volume 1</p> <p>13.This adequately addressed in Section 9.2.5.1, Volume 1.</p> <p>14.The replacement of trees on a like for like basis is not always possible and enforceable. It is considered that a provision in Section 13.29 are adequate.</p> <p>15.This is addressed in Section 13.29, Volume 1, pg. 268</p> <p>16.The requirements for EIA are set out in the Planning and Development Regulations and are statute based in the first</p>

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		<p>19.Include objectives for promoting community supported agriculture (CSA), allotments and community gardens.</p> <p>20.Inclusion of a clear objective to promote the transition to pollinator friendly green spaces in all open space public lands managed by the Council.</p> <p>21.New developments should be required to ensure all open spaces include landscaping with native trees and plants</p> <p>22.Include clear objective for urban forests and urban greening</p> <p>23.Include goal to effectively manage features such as field boundaries that are essential for the protection and restoration of wild species</p> <p>24.Plan should acknowledge and raise awareness of the negative impacts of artificial lighting on wildlife.</p> <p>25.Include objective highlighting the importance of the European Landscape Convention and objective to implement National Landscape Strategy 2015-2025</p> <p>26.Include a clear objective against development that would adversely affect the character, principal components of, or the setting of historic parks, gardens and demesnes of heritage significance.</p>	<p>instance. Screening for EIA is a multifaceted assessment and is not contingent on a single issue.</p> <p>17.Planning applications are robustly being assessed against the natural heritage aspects of the Plan and National guidance.</p> <p>18.Policy, objectives and development management requirements in set out in Section 8.4.3, 9.2.3 and 13.20.2.1, Volume 1.</p> <p>19.This is addressed in Section 8.8, Volume 1 and 6.8.10, Volume 2.</p> <p>20.Policy supporting pollinators is set out in Section 9.2.9, Volume 1 and the county biodiversity plan.</p> <p>21.This is addressed in Section 13.29, Volume 1</p> <p>22.Policy relating to this is set out in Section 9.2.5.1, Volume 1.</p> <p>23.The management of hedgerows is the responsibility of the Parks section.</p> <p>24. Recommendation: Include reference to impacts of artificial lighting on wildlife in Chapter 9 Heritage.</p>

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		<p>27.Guidelines of the Inland Fisheries 'Planning for Watercourses in the Urban Environment' should be implemented as policy in the development plan</p> <p>28.Dereliction should be tackled as a priority in the Plan, there is a strong need for town health checks and place-making interventions.</p> <p>29.The Plan should ensure all new proposals for development should be fully permeable for walking and cycling</p> <p>30.New residential developments should provide for filtered permeability – provide for walking, cycling, public transport and private vehicle access only.</p> <p>31.Include an objective for incentivising and enabling new measures to support active travel to school.</p> <p>32.Include reference to European Green Deal</p> <p>33.Plan should pursue economic development that incentivises transition from old practices of consumption, production and product lifecycles</p> <p>34.Include reference to Waste Action Plan for a Circular Economy and include its policies and objectives</p> <p>35.Plan should support sustainable tourism in a way that has a positive impact on the environment.</p>	<p>25.The Plan acknowledges each of these documents in Section 9.2.12.1, Volume 1.</p> <p>26.Section 9.3 sets out development management guidance for any development in the vicinity of built heritage</p> <p>27.Recommendation: Reference 'Planning for Watercourses in the Urban Environment' in the Plan.</p> <p>28.This is addressed in Section 4.2.1, Volume 1</p> <p>29.This is adequately addressed in Section 12.2, Volume 1.</p> <p>31.School travel plans are addressed in Volume 1 Section 12.3 and Section 12.5.2. It is a development management requirement to provide work place travel plans. Travel Plans are included in DM standards.</p> <p>32. This is implemented through Government policy which is fully referenced in the Plan.</p>

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		36.Include an objective to develop strong links with tourism providers to encourage and incentivise environmentally conscious and responsible tourism.	<p>33.Noted.</p> <p>34.The Plan supports the implementation of the Southern Regional Waste Management Plan, which supports the promotion of resource efficiency and the circular economy.</p> <p>35.Recommendation: Include sustainable tourism in Objective 5C <i>"To continue to develop sustainable high quality tourism, leisure and complementary activities for the City & County with the key stakeholders enhancing the position of Kilkenny as a Hero site within the Ireland's Ancient East Branding"</i>.</p> <p>36.This is an operational matter and not a matter for the plan</p>
KK-C162-342	Kilree Partnership	<p>1.Lands at Newpark Shopping Centre should not be rezoned as requested by Wescourt Healthcare.</p> <p>2.The land owners at Newpark Shopping Centre were not made aware of this and Westcourt Healthcare Ltd do not have permission to access the subject lands via Newpark Shopping Centre.</p> <p>3.It would be contrary to the retail planning guidelines which are in place to safeguard neighbourhood centres in development plans.</p>	<p>1.As stated in the submission itself the Planning Authority would regard the Primary Care Centre as a complimentary facility to the existing and well-established Newpark Shopping Centre which is currently servicing the surrounding community.</p> <p>2.The operation of the Health Care Facility and the uses therein will be governed by the HSE as operators.</p> <p>3.Planning policy will indicate that the neighbourhood is there to provide neighbourhood facilities at a scale which will be commensurate with the neighbourhood being served.</p>

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		<p>4. Subject lands in question are part of the open space requirement for the Lintown Hall Housing Estate.</p> <p>5. There is no justification for reducing the area of land zoned for Amenity/Green links/Biodiversity conservation/ Open Space/Recreation uses.</p>	<p>4. The unit is now constructed and open and is operating with various health care uses. It will integrate into the Newpark Neighbourhood centre over time.</p> <p>5. If the current zoning of the primary care unit remains then each and every new use to go into the centre could in theory contravene the open space zoning of the site. This would make the operation of the unit impractical.</p> <p>The zoning of the primary care unit site to be changed to Neighbourhood zoning</p> <p>Recommendation: Change the site of primary care unit site (buildings excluding car park (as defined under ref 18/59) to Neighbourhood centre</p> <p>See also submissions 124, 339, 390, 395 & 439.</p>
KK-C162-343	Nicola Ryan	Rath Ullard	See submission ref. KK-C162-60
KK-C162-344	Eithne Lacey	Rath Ullard	See submission ref. KK-C162-60
KK-C162-345	Brian O' Reilly	Rath Ullard	See submission ref. KK-C162-60
KK-C162-346	James Kelly	Rath Ullard	See submission ref. KK-C162-60
KK-C162-347	Clare Molloy	1. This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-348	Liam Fennelly	1. The omission of specific 'zoning maps' as had been included in the 2014 - 2020 Development Plan is a concern. Given that many of the smaller towns and villages scheduled in the Draft Plan already have had LAPs	The LAPs for Bennettsbridge and Kilmacow have expired and have, due to not meeting statutory thresholds for Local Area Plans, not been renewed.

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		<p>2.The absence of plans would compromise the Planning Authority in exercising its development management control function. In the absence of any alternative objective development management control measures for "development in smaller towns and villages " the zoning Maps as the settlement boundaries should be retained until reviewed with the Local Community.</p> <p>3.All of the smaller towns and villages scheduled in the Draft Plan should be categorised as rural as per the NPF and CSO.</p>	<p>2.Development management in these settlements will be undertaken with due regard to the settlement boundary and regard can still be had to previously expired plans (See Section 4.8).</p> <p>3.In accordance with Table 4.4 these smaller towns and villages are classified as "Rural".</p>
KK-C162-349	Jennifer McIntyre	Rath Ullard	See submission ref. KK-C162-60
KK-C162-350	Pauline and Leonard O'Shea	1.This submission relates to the Wind Energy Strategy and objects to the change in designation for lands in their community, which is not specified. Their reasons include: lack of consultation, impact on the natural species, Pollution, both from construction and visual and impacts on heritage.	1.The Wind Energy Strategy has been amended as outlined under Section 3.1 Lingaun Valley, Section 3.2 Castlebanny and Section 3.3 Templeorum.
KK-C162-351	Eoghan Kinane	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-352	Kieran Butler	1.Proposed settlement boundary for Ballyragget will be detrimental to the SAC/SPA/pNHA	<p>1.Proposed development will be assessed against the Habitats Directive. Any development detrimental to the protected area will not be permitted</p> <p>2.This will be assessed at planning application stage</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>2.This area is adjacent to the floodplain and is therefore inviting contamination from runoff from potential construction and residents</p> <p>3.Request to designate River Nore/Abbeylax Wood Complex pNHA 0025076 as a NHA</p> <p>4.Carry out necessary surveys and engage with residents on how to work with them to improve the area to the benefit of both the environment and the people of the town</p> <p>5.Request commitment to improve the quality of water within the catchment and clarity on what efforts are proposed to reach the high-water status of programmes such as the Blue Dot catchment programme</p> <p>6.Provide protection for the river corridor of the River Nore and the tributaries that discharge to the river.</p> <p>7.Link designated areas to local biodiverse areas</p> <p>8.Provide stepping stone area to reduce distance between wildlife corridors</p>	<p>3.This does not come under the remit of the Development Plan process.</p> <p>4.This could be achieved as part of the Town Team to create a Town Plan for the settlement</p> <p>5. Improvement to water quality is an objective of the Water Framework Directive. Measures for the safeguarding of water quality are identified through the SEA and brought forward as policy and development management recommendations.</p> <p>6.This is addressed in Section 9.2.2, Volume 1</p> <p>7.Noticed</p> <p>8.Noticed</p>
KK-C162-353	Clara GAA	<p>1.Request for inclusion of an objective for the provision of a pedestrian facilities from Clara school to Clara GAA Club, to provide a pedestrian and cyclist crossing to Clara GAA Club and segregate the cycle facility on the R712, to allow this to be used as a cycling route to Kilkenny.</p> <p>2.Consider identifying Clara as a smaller settlement</p>	<p>1. Mobility & connectivity is encouraged in the Plan. Where new developments are proposed the connections to any proposed development can be examined. In the case of existing developments facilities require to be retrofitted. There is a general objective in the draft plan to cover these type of improvements within the county. (Objective 12H)</p>

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			2. All settlements were assessed at plan making stage. Clara did not meet the criterion for a smaller settlement. It is classified as a node.
KK-C162-354	Ecopower Ltd	<p>1.This submission relates to the Wind Energy Strategy and is from Ecopower, which was established in Kilkenny in 1996 as a renewable energy company concentrating on the development of on-shore wind energy. The submission seeks that the definition of 'Small-Scale Wind Energy Developments' be amended as follows:</p> <ul style="list-style-type: none"> • Increase the output limit from 5MW to 15MW, • increase the hub height limit from 65m to 90m, <p>as they consider this to be restrictive in the context of the output capacity of modern wind turbines and the commercial reality of developing windfarms. This would increase viability for a community led project to succeed in any future Renewable Energy Support Scheme (RESS) Auction and be capable of financing the necessary grid connection.</p>	1.The Wind Strategy allows for 'Small Scale Wind Energy developments' to be considered in areas designated as Open for Consideration or Acceptable in Principle. Given that these strategy areas encompass such a large proportion of the county, it is considered prudent to maintain the limitations to scale as they are. Any larger scale wind farm will be considered in the Acceptable in Principle areas.
KK-C162-355	Southern Region Waste Management Planning Office	See Section 2A above	

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KK-C162-356	Peter Thomson on behalf of Kilkenny Cooperative Livestock Market Limited	<p>1.The submission relates to Cillin Hill and seeks an increase in the percentage of industrial and related use floor.</p> <p>2.Space relative to the entire floor area permitted on the site from 40% to 60% and that that the range of permitted uses under the zoning is increased, without introducing uses into the zoning objectives which would undermine the city centre and neighbourhood centres and other business zoned lands.</p> <p>3.It is also evident from the enquiries received from business premises enquiries, that demand exists for a wider range of uses than those currently available. Many of these uses, while not directly agri-related, would be equally suited to Cillin Hill as they would to industrial or business parks and would benefit the existing Agri trades by their presence.</p> <p>4.Cillin Hill has the capacity for some speculative industrial units, including start-up/ nest units, and it is confident that, if developed, there would be no shortage of take-up.</p> <p>5.Submission requests the following additions - information technology-related, industrial and office development and ancillary services, enterprise centre, light industrial, office-based industry, science and technology-based industry and motel.</p>	<p>1.A recent study as part of planning ref 20/327 identified that 37% of the uses on the site either constructed and/or permitted are of the non-agri business category.</p> <p>2.Having regard to the extent of lands left undeveloped (approx. 1.5ha) the extent of development that has already occurred on the lands it is considered reasonable that the percentage of non-agriculture development be increased from 40% to 60%.</p> <p>3.The permitted uses already include for technology-based industry and it is not considered suitable for office-based industry considering the extent of zoning for such use with the plan area already so no change to the permitted uses in the zoning category.</p> <p>Recommendation: Change the text on page xx Vol2 to as follows: The total of industrial and related uses amount of non agricultural trade uses should not extend to more than 60% of the entire floor area of buildings on site.(p26 vol 2)</p>
KK-C162-357	Carrick-on-Suir Tourism and	1. This submission relates to the Wind Energy Strategy and is from COSTEDC, which is an umbrella body for a number	1. See discussion under Section 3.1 Lingaun Valley.

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	Economic Development Committee	of development-oriented entities in the town of Carrick-on-Suir and its hinterland with a particular emphasis on tourism and economic development. COSTEDC is very concerned that the change in the Kilkenny Development Plan will enable permission to be granted for wind turbines around the Lingaun Valley and will also make it acceptable to grant permission for wind turbines in Tipperary at Carraigadoon above Faugheen with a consequent deterioration of the visual appearance of the backdrop to Carrick-on-Suir on the Kilkenny border. See discussion under Section 3.1 Lingaun Valley.	
KK-C162-358	Josephine Rohan	1.This submission relates to the Wind Energy Strategy and refers to the Kilkenny Co. Co and Tipperary Co. Co Wind Turbine Strategies, and that areas previously unsuitable to turbines are now zoned/deemed suitable. This submission therefore relates to the Lingaun Valley area, see Section 3.1.	1. See discussion under Section 3.1 Lingaun Valley.
KK-C162-359	Evergreen FC Submission	1.The club requests that provision is made for an appropriate number of full-sized playing pitches adjacent to the proposed new schools in the Western Environs of Kilkenny City. The provision of suitable full-sized playing pitches 130m X 90m in the Western environs could enable the club to expand our service to meet the needs of the new community in addition to enhancing services to our existing membership.	1.The Club's aspirations for access to playing pitches in the Breaghagh Valley, formerly referred to as the Western Environs, is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breaghagh Valley. These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is

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		2.The club are also eager to develop partnerships with the three new schools in the Western Environs and recognise the positivity of facilities being sited adjacent to the schools.	recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands. Recommendation: <i>Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breaghagh valley.</i>
KK-C162-360	Brendan Barry	1.This submission relates to the Wind Energy Strategy and refers to the area around Windgap, Kilmaganny and Owing. See Section 3.1 in relation to the Lingaun Valley area.	1. See discussion under Section 3.1 Lingaun Valley.
KK-C162-361	Martin and Lorraine Bookle	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-362	Wyn Mathias, Mrs Elaine Mathias, Ms Ellie Mathias, Master Samuel Mathias, Ms Mia Hogan	1.This submission relates to the Wind Energy Strategy and objects to the change in designation for lands in their community (Templeorum) to 'Acceptable in Principle'. See discussion under Section 3.3 Templeorum.	1. See discussion under Section 3.3 Templeorum.
KK-C162-363	Kilkenny Green Party	1.Welcomes Kilkenny County Council's clear commitment to taking on the challenge of reducing carbon emissions. and tackling the equally serious crisis in biodiversity loss. The	

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	Kilkenny Green Party	<p>language used in the County Development Plan should be strengthened to reflect this very serious commitment and ambition.</p> <p>2.Section 2.1. Replace red with yellow text as below:</p> <p><i>(a)Develop policy in the City & County Development Plan to use wherever feasible (promote) local materials and use of sustainable, low carbon footprint materials instead of those that require intense high temperature and carbon emissions</i></p> <p><i>(b)Develop policy in the City & County Development Plan to promote and advise for (make a priority), the use of environmentally friendly material and appropriately designed new buildings, which utilise orientation, shelter, sun, light, etc. in design details, (for all projects).</i></p> <p><i>(c)Aim to measure (Report annually to the people of Kilkenny) the carbon impact....</i></p> <p>3(a)Deliver a 50% improvement in energy efficiency by 2030 (on the 2009 baseline), (Annual target required)</p> <p>(b)Ensure that policies and practices at local government level lead us towards low carbon pathways and put in place...</p> <p>(c)Exercise planning and regulatory roles to help improve climate outcomes in the wider community and beyond the public sector, by developing and implementing robust evidenced</p> <p>(d).....by influencing spatial pattern of development, encouraging (ensuring) a modal shift from private car to</p>	<p>2.(a), (b) and (c)</p> <p>Recommendation: No Change</p> <p>The text from these sections is taken from the adopted strategy and should not be changed.</p> <p>3.(a), (b) and (c) Recommendation: No change.</p> <p>Targets and reporting procedures will be governed by State in the Climate Bill when enacted.</p>

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	Kilkenny Green Party	<p>more sustainable modes of travel, assisting in the protection and promotion of biodiversity, the protection of trees and hedgerows, etc. This Plan sets out to integrate climate implications to inform (drive) spatial choices...</p> <p>4.(a) Support and translate National and Regional targets/obligations to a local level.</p> <p>(b) Ensure integration on these policies and objectives in (underpin) planning related decision-making processes.</p> <p>(c) The implications of this approach are that Climate change policies are integrated into (underpin) all sections of the Plan.</p> <p>5. Through its own projects and through the development management policies within the Plan the Council seeks to (will) protect and enhance biodiversity.</p> <p>Strategic Objectives</p> <p>2.5 2A To support and encourage (ensure) sustainable compact growth.....</p> <p>7.2B To support the implementation of the National Climate Action Plan and the National Climate Action Charter for Local Authorities, and to facilitate (implement) measures which seek to reduce emissions...</p> <p>8(a).2C To promote, support and direct effective climate action policies and objectives that seek to improve climate outcomes...</p>	<p>4. No change recommended.</p> <p>5. Change text from "seeks to" to "will."</p> <p>6. The policies and objectives in the Plan are set out to achieve sustainable compact growth in line with the NPF.</p> <p>7. Recommendation: No change. Measures in the National Climate Action Plan will be mandatory.</p> <p>8(a) and (b) Recommendation: No change.</p>

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	Kilkenny Green Party	<p>8(b).2E To ensure that the Draft Development Plan transposes, supports and implements strategic objectives of the National Planning Framework and the Southern Regional Spatial and Economic Strategy to create an enabling (a) local development framework that: (a) promotes and integrates (ensures) important climate considerations (are key) in local development and the assessment of planning applications and (b) supports the practical implementation of national climate policy and sets targets to assist in the delivery of the national transition objective.</p> <p>9.2F To promote and encourage (adopt) nature-based approaches and green infrastructural solutions as viable mitigation and adaptation measures to reduce greenhouse gas emissions</p> <p>10.2G To reduce energy related CO2 emissions of Kilkenny County Council (by 7% per annum)</p> <p>General Notes</p> <p>11. There is no mention of the environment in the key strategic issues (Para 1.7) for Kilkenny City (which is surprising given the content of Chapters 1, 2, 4 and 7).</p> <p>12. There is very little on the implementation, accountability and future communications on the Development Plan. The Council should regularly update on the progress of the plan during its lifetime.</p>	<p>OPR and Regional assembly satisfied with compliance in this section of the Plan.</p> <p>9.Recommendation: Amend Objective 2F as follows - To adopt nature-based approaches and green infrastructural solutions as viable mitigation and adaptation measures to reduce greenhouse gas emissions where feasible.</p> <p>10.These targets will be governed by the Climate Action bill when enacted. No change required.</p> <p>11.Section 1.7. This is the text from the Corporate Plan which is formally adopted by the Council.</p> <p>12.There is a requirement to produce a Chief Executives report on the implementation of the Plan after 2 years. In addition, the monthly chief executives report gives details of progress across all sections of the Council.</p> <p>13(A)NIS (4.3.1.6) In the NIS it states that "potentially conflict with climate mitigation and provisions that will help to contribute towards climate mitigation."</p> <p>13(B). Section 1.3 "Appropriate Assessment" of the Plan provides that 'Projects giving rise to significant cumulative,</p>

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	Kilkenny Green Party.	<p>13(a) 4.3.1.6 Climate Change: The report states that "The Plan includes provisions that potentially conflict with climate mitigation".</p> <p>13(b) No provision that potentially or actually conflicts with climate change mitigation should be included in the County Development Plan.</p> <p>15.Ch 2. Climate Change. Objective 2B, C, D, E, F, G, H: The Plan should identify a decarbonisation zone and set an objective to, at minimum, match the carbon reduction targets of the National Climate Action Plan. Kilkenny City is the most obvious decarbonisation zone.</p> <p>16.Ch 2. Climate Change. Objective 2H: "...reduction of greenhouse gas emissions by 10 percent every 5 years..."; this is not sufficiently ambitious, and does not align with the stated national policy objective of a 7% reduction per annum.</p> <p>17.Ch 3 3.9 – Key strategic issues for this plan: Kilkenny County Council restate its commitment to delivery of the</p>	<p>direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted on the basis of this Plan. No change required.</p> <p>15. Work on the decarbonisation zone is progressing. It is recommended that a specific objective 2I be included in the plan for the identification of a decarbonisation zone.</p> <p>16. Climate Action targets will be governed by the Local Climate Action Plans which will be statutory documents.</p> <p>17. There is a commitment to deliver housing in the Abbey Quarter as part of the land use mix of between 30 and 35%. (page 26 of the Urban Design Code)</p> <p>18. The appropriate infrastructure required will depend on which area is being examined at a particular time.</p>

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	Kilkenny Green Party.	<p>social housing scheme for the Abbey Quarter Development as stated in Phase 3 of the AQD Master Plan. avoid the creation of any new car parks in Kilkenny and facilitate the movement of tourists from existing coach parking facilities, by way of electric tourist vehicles or city link mini buses.</p> <p>18.Ch 4; Core Strategy Objective 4J To develop a programme for new homes in small towns and villages' should be strengthened with specific mention of what consists of appropriate infrastructure, e.g. transport links to larger towns, broadband, community hubs, shared remote working facilities, public EV charge points, sports and recreational facilities etc.</p> <p>19.Ch 5 - Tourism: The more people working in hospitality, the greater the need for social and affordable housing and with every job created in this industry, will create a need for housing at a cost to the Council.</p> <p>20.Ch 5 Economic Development Objective 5Q should be reworded to read "... all modes of transport that contribute positively towards climate change mitigation and environmental improvement."</p> <p>21.Ch5 Economic Development Objective 5Aa This is far too vague and insufficiently ambitious, in the context of the National Climate Action Plan. Definite objectives need to be set, e.g. provision of park and ride (incl park and bike) facilities on the outskirts of Kilkenny City, integrated with the</p>	<p>19. The housing strategy set out how the various types of housing required including the requirements for social housing.</p> <p>20. Recommendation: Amend objective 5Q as follows - To improve the accessibility of each of the County's town centres and promote all sustainable modes of transport.</p> <p>21.The specifics of how the City will transition is far too detailed to be covered with one objective. The Local Transport Plan will set out an agenda of objectives for improved sustainable transport which it is an objective of the Council to implement.</p> <p>22.Individual designs are assessed against the backdrop of all the policies contained in the development plan including conservation and design principles set out in placemaking. For the Council's own developments these are also required to have planning consent under the Part 8 process and along</p>

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	Kilkenny Green Party.	<p>bus service and cycling / walking routes into and around the City. Objectives 12D, E, F and G also refer.</p> <p>22.CH 6 – Strategic Objective 6A: Caution against the proliferation of box type architecture and encourage the Council to seek innovative designs for new buildings, that enhance our 'sense of place' and our existing built heritage.</p> <p>23.CH 6 – 6.15 Social Inclusion: would like to see it acknowledged that one bed apartments are not universal design and do not meet the criteria of meeting 'lifetime housing' and there should be no more purchase of one-bed units for council housing stock. The provision of 'Changing Places' toilet facility must be a priority for the new public library.</p> <p>24.CH 6 Housing and Community Objectives 6M, N: There already are and will be too many schools located west of the Nore. It should be a strategic objective of the plan to appropriately re-balance the location of primary and secondary schools around Kilkenny City.</p> <p>25.Ch7 7.3 – Remote working: Would like to see Kilkenny County Council take a lead in the provision of quality remote working hubs in the city and at suitable locations in the county where broadband is available.</p> <p>26.Ch7 Rural Development Objective 7a: This objective should support and encourage suitable housing</p>	<p>with that there is additional requirements for procurement which also affect the over design.</p> <p>23.In the housing strategy one bed apartments are identified as a needed housing solution. The purchase of these units is not a matter for the Development Plan. It is an operational issue.</p> <p>24.It is unrealistic to seek the movement of existing school sites without the co-operation of the schools themselves or the Department of Education. New schools and/or relocation of existing school are planned for areas that will see population expansion of the plan period and beyond.</p> <p>25.There is a specific objective introduced as part these amendments to support remote working hubs. (see submission RA)</p> <p>26.There are policies in the plan supporting rural villages as a potential alternative to one off rural housing. There are discouraging ribbon development.</p>

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	Kilkenny Green Party	<p>developments in and immediately adjacent to existing towns and villages and to pro-actively discourage ribbon development and other housing developments located outside of rural towns and villages.</p> <p>27.Ch 8 – 8.3 The GP feels it is imperative to maintain and protect the variety of walks and trails use by locals and tourists alike.</p> <p>28.Ch 9 Heritage and Culture Objective 9M: This should be reworded to read "To provide a facility for the Barnstorm Theatre group within the Abbey Quarter", i.e. not "...provide for a facility...</p> <p>29.Ch 11 Renewable Energy: The GP urge Kilkenny County Council to ensure at pre planning meetings, that any community impacted by the development of a wind farm are fully consulted well in advance of an application being lodged, so as to give the community an opportunity to consider the application and make meaningful submissions. Any unnecessary barriers should be removed so as to encourage take up of renewable energy systems.</p> <p>30.Objectives 12A and 12B: These objectives should be worded "to plan for and progressively implement..."; they're not sufficiently ambitious as stated in the draft.</p>	<p>27.Amenity walks and trails are protected through various policies and objectives of the plan and objectives to develop more are also included.</p> <p>28. It is the intention of the Council to accommodate The Barnstorm theatre group within the Abbey Quarter</p> <p>29.The public consultation process required for renewable energy projects is set out at national level. The Council always encourages developers to engage in consultation.</p> <p>30.Recommendation: Amend Objective 12A as follows - <i>To plan for and progressively implement a sustainable, integrated and low carbon transport system by enhancing the existing transport infrastructure in terms of road, bus, rail, cycling and pedestrian facilities and interfacing different modes as the opportunity arises</i></p> <p>31. No requirement to add to paragraph 9. Communications of the Council's work and activity is important and apart from the statutory requirements the Council proactively communicates and is always seeking to improve its communication with citizens.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
	Kilkenny Green Party	<p>31.Vol 2 Amend Para 1.7 to read: Subpara 9: Prioritise the environment and maintain the quality of life offer in Kilkenny City which is renowned, as evidenced in its population growth Add a Subpara 10 to read: Develop and implement a strategic communications plan to update the public on the progress of the County and City Development Plan.</p> <p>32.Vol 2 Objectives C2C and C2D: These two objectives should be targeted with a much shorter timescale, e.g. within the first two years of this Plan.</p> <p>33.Objectives C2E: This should also be completed within the first two years of the Plan, at most.</p> <p>34.Objective C3F: should be amended to make it clear that the provision of office or other commercial accommodation will not be to the exclusion of residential space.</p> <p>35.Ch 4 – 4.4 Urban Structure: there is no mention of James Stephens Barracks in this Chapter on Heritage and Culture or in the entire Development Plan. Amend Para 4.4 to add: Kilkenny City is the home of the 3rd Infantry Battalion of the Defence Forces, based at James Stephens Barracks, one of the longest occupied military barracks in the country.</p>	<p>32. Both master plans were halted due to the impacts of Covid -19. St Canices master plan has recommenced and a public consultation exercise will commence in June 2021. Fair Green master plan will commence in Q3 2021.</p> <p>33. It is expected that a masterplan for the Mart site would be completed within 2 years. There is a specific objective which allows the plan to be developed with the site owner.</p> <p>34. The mixed-use zoning of that area does allow for residential use.</p> <p>35. Recommendation: Insert paragraph on James Stephen's Military Barracks in Section 1.6 of Vol 2 as follows: <i>"The significant contribution of the presence of the 3rd Infantry Battalion of the Defence Forces and James Stephens Barracks to the local economy by means of employment and emergency management and response is acknowledged."</i></p> <p>See Kk162-115</p>

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	Kilkenny Green Party	<p>36.Ch 5 Movement and Mobility: There should be a specific objective to address the issue of parking associated with events taking place at Nowlan Park.</p> <p>37.Cha4 or Ch 6: There should be a specific objective to provide an off-road sulkie racing facility for members of the Traveller community and other interested parties.</p>	<p>36.The parking associated with activities at Nolan Park is an operational issue and not properly addressed through the City Plan.</p> <p>37. Proposals for such facilities in appropriate locations can be assessed by the council. The Plan does not militate against the provision of such a facility.</p>
KK-C162-364	Suzanne Finnerty	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KK-C162-365	Kilkenny LGFA Linda Healy	<p>1.The development of a second LGFA Club in Kilkenny City is being considered, access to playing facilities in this part of the city will support and accelerate this process.</p> <p>2.In this spirit of partnership, the Association is committed to developing partnerships with the three new schools in the Western Environs and recognise the positivity of facilities being sited adjacent to the schools.</p> <p>3.The Association is supportive of delivering a facility in the Western Environs and request that a number of playing pitches with dimensions of 90 metres * 145 metres (as a minimum) be made available.</p>	<p>The Association's aspirations for growth and access to playing pitches in the Breagagh Valley, formerly referred to as the Western Environs, is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breagagh Valley.</p> <p>These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p> <p>Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breagagh valley.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-366	Linda Healy	<p>1.Relates to lands at Kellymount, Paulstown, immediately adjacent to the proposed settlement boundary and to the North of the Applegreen filling station complex. It is considered Paultown's position in the Core Strategy does not reflect its size and potential.</p> <p>2.The inclusion of these lands would benefit the village by providing for sustainable development and consolidating the village core from the An Choill Rua development to Applegreen, providing connectivity and accessibility to one of the largest employers and services provider within the village, all within walking distance of the village core.</p> <p>3.The submission quotes Objective 3a, 18b and 19 of the NPF.</p> <p>4.Irish Water, in conjunction with Kilkenny County Council, have announced plans for the upgrade of the Gowran Regional Water Supply Scheme and new water treatment plant.</p>	The land lies to the North of the regional road and does not contribute towards compact town form. It is not recommended that the land be added to the boundary.
KK-C162-367	James Stephens GAA Club	1.The Club are aware that the development of the Western Environs of Kilkenny City will include a new town centre/commercial hub, housing, recreational and amenity facilities and three new schools and are particularly interested in the provision of suitable full-sized playing pitches to enable meeting the requirements of the Western Environs in addition to enhancing services to our existing	<p>The Club's aspirations for growth and access to playing pitches in the Breaghagh Valley, formerly referred to as the Western Environs, is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breaghagh Valley.</p> <p>These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these</p>

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	James Stephens GAA Club	<p>membership in the wider community of Kilkenny City and County.</p> <p>2.The club are eager to develop partnerships with the three new schools in the Western Environs and recognise the positivity of facilities being sited adjacent to the schools and require playing pitches with an area of 90 metres * 145 metres.</p>	<p>will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p> <p>Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breagagh valley.</p>
KK-C162-368	Mark Bannon on behalf of Raggett Homes	<p>1.The subject 5.8Ha site adjoins the Loughmacask Masterplan area and is located to the West of the Dunningstown Road and South of the Hillcrest Estate.</p> <p>2.The lands are adjacent to existing zoned lands, have access to public utilities and immediate access to the proposed inner relief road / Central Access Scheme road from the Freshford Road (R693).</p> <p>3.The site has access to existing public services such as mains foul sewer and water, E.S.B., Gas and Telecommunications available. The site is close to planned CBS and amenities such as James' Park and the River Nore Linear Park and within walking distance of primary and secondary schools along the Granges Road and within minutes of Kilkenny City Centre.</p> <p>4.Submission suggest that the lands should become zoned for low density residential usage to protect and reflect the established residential character of the area.</p>	<p>The lands are located outside any pre-determined expansion areas of the City over the lifetime of the Draft Plan until 2027. The lands are considered premature pending the roll out of significant development areas such as the Breagagh Valley, Loughmacask and significant sites within the built-up area of the City such as Abbey Quarter.</p> <p>Low density housing on the periphery of the City is antithetical to the concept of compact growth and the 10-minute City.</p> <p>Recommendation: No Change</p>

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KK-C162-369	Windgap GAA Club	1.The submission proposes the development plan should contain the idea of "serviced sites" to encourage families to re-locate back to their communities from further afield/abroad. One off housing developments should also be encouraged in the Windgap area. The plan as proposed does nothing for communities like Windgap with many more areas around the county are also neglected in this plan.	Windgap is a 4 th Tier Rural Node and identified as such on Figure 4.2 of the Core Strategy. As a Rural Node, the draft plan requires that new growth in Windgap should be appropriate to the size of the settlement. The draft Plan does however not militate against rural housing in general or against the return/relocation of people back to rural communities, including Rural Nodes such as Windgap.
KK-C162-370	Coillte	<p>This submission relates to Forestry, Tourism and Renewable Energy.</p> <p>Forestry and Tourism</p> <p>1. In relation to Forestry, Coillte seek that references in the Draft Plan are broadened to refer to the fact that regulation of forest practices and policy resides with the Department of Agriculture, Food and the Marine and their professionally qualified inspectorate.</p> <p>2. In relation to Woodstock, Coillte seek that the provision of forest based tourist accommodation could be provided at an appropriate location within the Coillte estate, whilst protecting and enhancing the natural and built assets of Woodstock.</p> <p>3. More broadly, the submission requests that the Council consider the inclusion of policy support for forest-based tourism accommodation typology at suitable locations within the county, and to consider the provision of planning</p>	<p>1. Forestry is covered in Section 7.4 of the Draft Plan, and a reference to the regulatory role of the Department of Agriculture will be included as follows:. The Department of Agriculture, Food and the Marine regulates forestry practices and has published a vision document Forests, products and people Ireland's forest policy – a renewed vision in 2014.</p> <p>2. Policies for Woodstock are set out in Section 5.2.6 Woodstock of the Draft. A reference to forest-based tourist accommodation will be included here.</p>

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	Coilte	<p>policies / land use zoning objectives, to support development on Coillte lands where suitable.</p> <p>Renewable (Wind) Energy</p> <p>4. Coillte welcome the supportive renewable energy policies and objectives in Section 11 of the Draft Plan.</p> <p>5. The submission requests that any extracts from the Draft Guidelines on Wind Energy Developments (2019) be removed and that the Draft Plan simply cross reference the Guidelines on Wind Energy Developments, or any update thereof, for development guidance.</p> <p>6. Coillte recommend that the Council recognise the benefits of larger capacity turbines, due to their energy output and potential to meet national renewable targets. In this context, the height limit of 65m for turbines to be considered in the Open for Consideration category should be increased as:</p> <ul style="list-style-type: none"> the landscape and visual impact of potentially more developments with smaller turbines in clusters of 5, versus fewer larger turbines is complex and should be determined at a project specific level with the benefit of site specific visual 	<p>3. Section 5.2.7 Camping/Glamping Sites will be amended to include reference to forest based tourism accommodation.</p> <p>4. Noted.</p> <p>5. It is appropriate that the Draft Plan refer to any relevant provisions of the Guidelines. References to the Draft Guidelines will be replaced by a reference to the Government's <i>Wind Energy Development Guidelines</i>²⁶, and any revisions thereof". Once the revised Guidelines are adopted, the Council will review its Strategy to ensure compliance.</p> <p>6. The height restriction is considered appropriate in the areas open for consideration.</p>

²⁶ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

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	Coilte	<p>assessments, rather than as a policy in the Draft Plan,</p> <ul style="list-style-type: none"> turbines with 65m hub height are becoming scarce and difficult to source on the market, the energy output of these smaller models make the project less commercially viable (This is also the case if the total capacity is capped at 5MW). <p>7. Wind speeds should not be a distinguishing factor between lands that are 'acceptable in principle' and lands that are 'open to consideration' in the final WES. In addition, the SEAI Wind Atlas of Ireland 2013, which is used to delineate this spatially in the Draft Plan is derived from a computer model and would not be as accurate as on-site wind measurements.</p> <p>8. Coillte outline the many constraints operating to reduce the area available to wind farms, including setback distances from residences, site level constraints, landowner reluctance, ecology, heritage, and grid connection. More land (headroom) should be designated to account for the difference between theoretical resource and the actual capacity.</p> <p>9. Coillte has been advocating for the preparation of Regional Renewable Energy Strategies, however in the absence of those, each local authority should engage closely with neighbouring local authorities and with other</p>	<p>7. The formulation of the Wind Energy Strategy followed the methodology as set out in the Guidelines, which states as Step 1: "Assess the areas of wind potential ranging from areas with extensive wind energy resources to lesser wind resources using SEAI's Wind Atlas for Ireland."</p> <p>8. See Section 3.4 Targets for a discussion of the capacity of the total area of land designated.</p>

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	Coilte.	<p>local authorities in the Region to strive to attain the same important benefits and synergies of a Regional Energy strategy. In addition, county targets should be linked to the overall national ambition, rather than being based on the individual county demands.</p> <p>10. In relation to grid capacity, existing constraints should not be considered hard constraints, as the development of the Grid will react to (planning) consented developments where necessary.</p> <p>11. Wind energy is of importance to the county both in addressing Climate Change and in growing the Kilkenny economy and providing employment opportunities.</p> <p>12. Coillte request that conditions are not applied to restrict the life of a wind farm, as this would enable wind farms to continue producing clean energy at a very low cost to the consumer, for as long as possible and continue to contribute via rates to local authorities.</p> <p>Timber</p> <p>13.Coillte requests that the Council promote the use of sustainable timber products.</p>	<p>9. As set out in Appendix K, the Wind strategy designations in adjoining counties were considered, and we will continue to liaise with adjoining counties. Section 4.4.1 <i>Strategy areas of adjoining counties</i> of Appendix K will be updated to reflect any changes since the Draft Plan. As our target is 100% generation of Kilkenny's electricity needs from renewable sources, we intend making a greater contribution to the national ambition than our own county demands.</p> <p>10. Noted. Grid capacity is not considered as a hard constraint in the Draft Wind Energy Strategy. This will be clarified in the revised WES.</p> <p>11. Noted.</p> <p>12. The Draft <i>Wind Energy Development Guidelines</i>²⁷ recommend a time limit of approximately 30 years; and reference is made in the Plan to the development management guidance as contained in the Guidelines.</p> <p>13. Section 11.12 Sustainability and Energy Efficiency in Buildings promotes the use of sustainable, low carbon footprint materials.</p>

²⁷ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

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KK-C162-371	Ballyragget Playground Committee	Duplicate submission to KK-C162-318	Recommendation: Include the following Objective 4 M in Chapter 4 "To support the recommendations of the town plans compiled under the Town and Village Renewal Scheme
KK-C162-372	Kilkenny IFA	<p>1.Kilkenny IFA oppose any increase in Development Charges for once off Rural Housing as rural dwellers. IFA requests that landowners should retain the right to sell a site should they need/want to.</p> <p>2.Vacant Site – Kilkenny IFA insists that there is no change to the policy that active farm land should not be included in the vacant site register and is seeking clarity on the terms "urban agriculture" and "sustainability".</p> <p>3.IFA insists that farmers sons and daughters wanting to build on their parent's lands should not be impeded in any way.</p> <p>4.Kilkenny IFA suggest that the Local Authority complies with the national broadband Plan.</p> <p>5.IFA requests that rural road networks should be maintained to an acceptable standard equitable to road standards in urban areas.</p> <p>6.Kilkenny IFA requests the County Council to acknowledge that every farmer in the county has a right to bore a well on his land and source water for his/her family and Livestock.</p>	<p>1.The Development Contributions scheme is a separate document and is not part of the city and County Development Plan. The Plan does not prevent landowners from selling sites should they need or want to.</p> <p>2.Noted. Active Farm land in the ownership of the landowner prior to the combining into power of the Vacant site Levy provisions are not affected.</p> <p>3.The Rural Housing Policy allows for local Social need, such as the children of land owners.</p> <p>4.In section 10.4.1.2 includes the policy to facilitate the delivery of the National Broadband Plan.</p> <p>5.Rural Roads are maintained in accordance with the annual roads programme. This is an operational issue</p> <p>6.The plan does not restrict the right to bore a well for the use of an existing family or livestock, but does restrict development within Source Protection Areas in accordance with the Groundwater Protection Scheme and the Water Services Act.</p>

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		<p>Any restrictions on a landowner in that area needs to be dealt with and proper compensation for income and capital loss needs to be addressed.</p> <p>7.Greenway projects under development in the county should only be implemented after extensive consultation with landowners and adjoining landowners without the use of CPO.</p> <p>8.Kilkenny IFA requests that the current window for hedge cutting is maintained at a minimum.</p> <p>9.Kilkenny County Council should facilitate and encourage the microgeneration of renewable energy. Roof top solar on personal residences needs to be exempt from planning and development contributions.</p> <p>10.There needs to be zero cost access for the establishment of developments up to 50kw as set out in the governments Microgeneration Support Scheme (MSS) proposals.</p>	<p>7.Kilkenny County Council remains committed to consultation as part of all Greenway or other projects affecting farmland as required. The CPO process is however a statutory provision which acts in the public interest and the plan cannot impact the CPO process.</p> <p>8.The extent of the Hedge Cutting Season is not a matter for the Plan.</p> <p>9.The Plan already encourages micro generation of renewable energy. Roof Top Solar Development is exempt but restricted in extent in accordance with the Planning and Development Regulations and hence are not subject to development contributions. Where developments however exceed exempt limitations, planning permission is required and the levying of development contributions is a matter or the Development Contribution scheme and not the City and County Development Plan.</p> <p>10.The charges under the Microgeneration support scheme is not a matter fo the development Plan.</p> <p>11.Forestry Applications are dealt with by the Forestry Services and not Kilkenny County Council.</p>

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		<p>11.A proper planning system must be put in place to cater for all stakeholders in future developments / planning permission for new entrants into forestry.</p> <p>12.Sufficient funding must be available to tackle areas of the county where flooding is at issue notwithstanding the cost benefit clause. IFA insists that farmers have the right to protect their holdings from flooding and when maintaining drainage on public roads landowners and farmers should be consulted before any works are carried out.</p> <p>13.Farmers, who wish to start a Rural Business on their farms, should be looked at more favourable by the local Authority when planning issues arise and should receive an exemption from local authority rates for the first three years.</p> <p>14.The submission lists several proposals to deal with litter and dog attacks on farms.</p> <p>15.Kilkenny County Council should encourage Tunnels and Underpasses in the County for public safety and animal welfare reasons. All costs, restrictions and bureaucracy that the Local Authority have imposed needs to be reviewed.</p> <p>16.Kilkenny County Council needs to formulate a plan to deal with the decline of Rural Villages in the County and</p>	<p>12.This is an operational issue and is not a matter for the Development Plan</p> <p>13.Section 7.7 deals with Rural Diversification and the Council will support the development of suitable and sustainable Agriculture related industries. The requirement to apply for permission is as statutory requirement in the planning and Development Act (2000) and neither this requirement nor the imposition of rates are matters for the plan.</p> <p>14. Litter and dog attacks on farms are not matters that can be addressed in the City and County Development plan.</p> <p>15.Tunnels and Underpasses will be considered favourably for reasons of safety subject normal planning criteria.</p> <p>16.The designation of rural settlements for services site in accordance with Objective 4J of the draft plan and 18b of the NPF is a first step to the encouragement of development in settlements.</p>

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		<p>includes incentives such as rates exemptions. Local services in the community such as provision of supports to rural GPs, the rural post office network, rural schools and the local grocery/convenience shop should be seen as a key component of the character and life of any village in rural Ireland and needs to be assisted.</p> <p>17.To achieve greater accessibility to services in rural areas, it is necessary to improve the frequency and reach of public transport services.</p>	<p>17.Though the Rural Transport Programme/Local Link, the NTA in consultation with the County Council is already working on options for improving the frequency and reach of public transport services throughout the county.</p>
KK-C162-373	Finola Walsh	<p>1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.</p>	<p>1. See discussion under Section 3.1 Lingaun Valley.</p>
KK-C162-374	Helen Bacon	<p>The submission requests the Council to make it easier for older people in large rural properties to downsize by building a smaller house more suitable to their needs on their own land, or in their immediate area.</p>	<p>Meeting the housing needs of all sectors of society is a significant challenge and adaptation through different life stages presents difficulties both for rural and urban dwellers. Having a policy to allowing a second rural house could in the longer term affect the viability of rural practices through the urbanisation of the country side. The Council does at present operate a policy of allowing a second home on the basis of the original home satisfying the housing need of a family member. In the context of the Core Strategy and proposed distribution of population in the settlement hierarchy this is considered reasonable.</p>

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KK-C162-375	James Gannon	1.This submission relates to the Wind Energy Strategy and objects to the change in designation for lands in their community (which is not specified) to 'Acceptable in Principle'. Expresses concern about the potential effects such as visual impacts in their rural environment. In particular, they are concerned about a young child who has autism and is sensitive to noise, and may be also affected by flicker, shadow and vibrations.	1. The Wind Energy Strategy has been amended as outlined under Section 3.2 Castlebanny, Section 3.1 Lingaun Valley and Section 3.3 Templeorum.
KK-C162-376	Cathal Phelan	1.This submission relates to the Wind Energy Strategy and objects to the proposed plan, however the area to which the submission refers is not specified. Expresses concern about the potential effects on heritage, such as historic monuments and protected species. States that alternatives to large scale industrial wind farms should be pursued, as wind energy uses inefficient, obsolete technology.	1. The Wind Energy Strategy has been amended as outlined under Section 3.2 Castlebanny, Section 3.1 Lingaun Valley and Section 3.3 Templeorum.
KK-C162-377	Paul Crowley	1.It should be easier for older people in large rural properties to downsize by building a smaller house more suitable to their needs. Consideration should be given to allow the building of smaller houses in towns villages and also rural. It is currently encouraged in urban areas as infill but not permitted in the countryside.	Meeting the housing needs of all sectors of society is a significant challenge and adaptation through different life stages presents difficulties both for rural and urban dwellers. Having a policy to allowing a second rural house could in the longer term affect the viability of rural practices through the urbanisation of the country side. The Council does at present operate a policy of allowing a second home on the basis of

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			the original home satisfying the housing need of a family member. In the context of the Core Strategy and proposed distribution of population in the settlement hierarchy this is considered reasonable.
KK-C162-378	Kilkenny Recreation & Sports Partnership	<p>1. That participation in sport, physical activity, active recreation and active living is incorporated into the new Development Plan as an important objective in its own right.</p> <p>2. That Kilkenny County Council acknowledges the clear and important role of the local authority in implementing the actions of the National Sports Policy 2018-2027.</p> <p>3. That Kilkenny County Council commits to the development of a Local Sport Plan for Kilkenny.</p> <p>4. That Kilkenny Recreation & Sports Partnership will continue to be supported in the delivery of its strategy to increase participation in sport and physical activity in Kilkenny and will be included at an early stage in all relevant discussions and plans</p> <p>5. That there will be a dedicated physical activity/infrastructure unit in Kilkenny County Council</p> <p>6. That access to recreational spaces, facilities and amenities is improved for all citizens regardless of ability, age, socio-economic status etc.</p>	<p>1. Recommendation: To include a Strategic Objective in the Plan in Section 2.5 <i>"To promote and support physical activity, active recreation and an active lifestyle"</i></p> <p>2. That the following text be included in section 6.16 <i>"Kilkenny County Council plays an important role in implementing the actions of the National Sports Policy 2018-2027."</i></p> <p>3.</p> <p>4. Noted. This is an operational matter and KRSP will be included in all relevant project at the earliest stages.</p> <p>5. This is an operational matter and not a matter for the Development Plan.</p> <p>6. The Council is committed the principles of universal design as set out in the Building for Everyone: A Universal Design Approach, external Environment and Approach as per Sections 12.10 and 13.2.</p>

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		<p>7. That policy and design guidelines and processes are strengthened to ensure new and existing developments and infrastructure are physical activity friendly and fit for purpose.</p> <p>8. That infrastructure, including accessible public amenities eg. showers, bike racks, safe cycle parking, bike storage etc is provided to enable and promote walking cycling and other forms of mobility.</p> <p>9. That there is a plan put in place for improved provision of opportunities for physical activity in natural environments, supporting participation in physical activity, by all people of diverse abilities.</p> <p>10. That accessibility, inclusion and a multi-use approach is prioritised in the development and usage of the natural and built environment and outdoor recreation amenities.</p> <p>11. That a policy be put in place to support and facilitate the prioritisation of infrastructure to facilitate active lifestyles, safe places to walk, run and cycle.</p> <p>12. That Kilkenny County Council continue to commit to and support the development of Urban and Rural Community Sports Hubs through Kilkenny Rereation & Sports Partnership.</p> <p>13. Prlmary & Post Prlmary Schools in the Breagagh Valley Neighbourhood- Investment in additional and complementary facilities adjacent to the schools will</p>	<p>Recommendation: That the plan includes in Section 13.2 reference to <i>"Great Outdoors Access Guidelines"</i> to guide the design of outdoor spaces.</p> <p>7. Kilkenny County Council is committed to ensuring that new developments have the required infrastruture in place from the earliest stages (See section 8.9) and is committed to ensuring that where needs are identified in existing neighbourhoods, these needs are addressed in conjunction with local sporting and community groups as per section 8.5.</p> <p>8. Accesible public amenities are a priority for the Council and subject to funding, will accompany individual projects.</p> <p>9. Section 8.5 commits to the Council working with local development organisations, community groups and sporting organsiations in the development of active recreational facilities thoughourt the County and where required, enter into joint venture arrangements.</p> <p>10. See 6 above.</p> <p>11. It is recommended that the following text be inserted in section 6.16 <i>"to support and facilitate the prioritisation of infrastructure to facilitate active lifestyles, safe places to walk, run and cycle"</i>.</p> <p>12. Kilkenny County Council remains committed to these hubs.</p> <p>Recommendation: It is recommednded that the following text be included in section 6.6 <i>"Kilkenny County Council is</i></p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>provide opportunities for shared use between the school and community and the creation of a Community Sports Hub in the Western Environs incl. full size playing pitches (not available under the Department of Education scheme) to support sports clubs in the area in addition to other alternative recreational facilities and amenities based on a public consultation process.</p> <p>14. KRSP is delighted to see the continued commitment to the development of a water sports hub on the River Nore (8D).</p> <p>15. Kilkenny County Council should consider this development as a part of a wider action for the development of a Blueway on the River Nore.</p> <ul style="list-style-type: none"> • The submission is a feasibility/business plan for A Kilkenny Blueway Trail from Kilkenny City to Inistioge. Canoeing Ireland and the Irish Sports Council - National Trails Office to consider the Nore Valley for development a Blueway Trail of National significance. • The feasibility study concludes that the Nore Valley Blueway should be developed in two phases. This creates opportunity for local economic activity in the provision of guiding and rental services. 	<p><i>committed to the support the development of Urban and Rural Community Sports Hubs".</i></p> <p>13. It is recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands in the Breagagh Valley. Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breagagh valley.</p> <p>14. Noted</p> <p>15. The Plan supports the development of greenways and blueways, see Section 8.4 Greenways and Blueways.</p> <p>16. Objective 6N addresses this concern "To complete the preparation of a masterplan for the lands a St. Canice's campus in partnership with the Health Services Executive within the period of the plan".</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<ul style="list-style-type: none"> The submission includes extensive detail of the proposed Nore Valley Blueway Network, seven separate trails and 8 Trailheads. <p>16. St. Canice's Lacken - There is no action-or commitment to the development of the masterplan in St. Canices Lacken.</p> <p>17. In addition to the completion and promotion of the Kilkenny Greenway and the South East Greenway, a plan to enhance access to and offshoots from the Greenway connecting and to support safe and easy access to the Greenway should be put in place.</p>	17. The Plan supports the development of greenways and blueways and their connectivity, see Section 8.4 Greenways and Blueways.
KK-C162-379	Helen and Nicky Hawe	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KK-C162-380	Carrickshock GAA Club	1.Carrickshock GAA club have secured planning permission for a sports facility at Ballycaum Stoneyford. within the parish of Aghaviller the ongoing development of open play and recreation sites (as detailed in chapter 8 of the draft) needs to be extended to the village of Hugginstown.	1.Although the Plan does not zone lands or procure sites for facilities in smaller towns, section 8.5 includes the policy of the Council to co-operate with local sporting organisations and to enter into joint ventures where appropriate for the provision of such facilities.
KK-C162-381	Mooncoin GAA Club	<p>There are 3 items of concern in Rural Development Section. They are.</p> <ol style="list-style-type: none"> Protection of one of rural housing policies. 	1.Rural Housing in essence remains true to previous versions in plans adopted since the 2006 Rural Housing Guidelines issued but has been amended to reflect the requirements of objective 19 of the National Planning Framework.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>2. Provision of serviced sites to prevent rural depopulation.</p> <p>3. Provision of area for expansion of club facilities</p>	<p>2.The draft Plan supports the provision of Services Sites for small towns and villages under Objective 18b of the National Planning Framework. In this regard 22 villages, including Mooncoin, with Social and Engineering Infrastructure have been identified for growth. Within the boundaries of these villages the Rural Housing Policy will not apply.</p> <p>3.Although the Plan does not designate lands or procure sites for facilities in smaller towns, section 8.5 includes the policy of the Council to co-operate with local sporting organisations and to enter into joint ventures where appropriate for the provision of such facilities.</p>
KK-C162-382	Cloneen GAA Club, Clogh	<p>1.The lack of planning permission to one off- houses is a problem and refers to one case.</p> <p>2.The Council could purchase land and provide service sites in order for people to be able to live in the area.</p>	<p>The Rural housing Policy in essence remains true to previous versions in plans adopted since the 2006 Rural Housing Guidelines issued, but has been amended to reflect the requirements of objective 19 of the national Planning Framework.</p> <p>The Plan does provide for the development of serviced sites in towns and villages to assist in people securing housing in rural locations.</p> <p>2. The Plan includes an objective (4J) to develop a programme for 'new homes in small towns and villages' in conjunction with, public infrastructure agencies and objective 4L to prepare design and best practice guidelines for the provision of cluster housing in the rural settlements</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-383	Keep Kilkenny Beautiful	<p>1.Integrate Kilkenny Tree Cover Master Cover Plan, initiated in 2020 into Kilkenny City and County Tree Management Strategy as part of KCC's Climate Change Adaptation Strategy</p> <p>2.Request for KCC to collaborate with Keep Kilkenny Beautiful in an annual Biodiversity and Tree Planting Challenge</p> <p>3.KCC would identify and acquire additional suitable land for continued tree planting</p> <p>4.Request for native trees and hedgerows be planted in Market Yard and St. Mary's Car Park in accordance with Climate Change 2019 Adaptation Strategy</p> <p>5.That native tree and hedgerow planting be used in new housing developments and avoid the use of Laurel.</p> <p>6.Request for the principles of Net Biodiversity Gain be adopted as a condition of all future infrastructure and housing development</p> <p>7.That a Municipal bio-digester be constructed as a priority within or close to the city.</p> <p>8.Request for KCC to devise and implement Local Area Biodiversity Action Plans in line with the Kilkenny Tree Cover Master Plan.</p> <p>9.Request for KCC to commit to increasing their actioning of the National Pollinator Plan</p>	<p>1. Alteration to the Climate Change Adaptation Strategy is not under the remit of the plan making process.</p> <p>2. This request will be forwarded request to Parks Section of Kilkenny County Council</p> <p>3. Tree planting and biodiversity forms part of all works projects by the Council where that is feasible.</p> <p>4.The Development Plan supports the Adaptation Strategy. While tree planting in the areas identified is not specified there are a series of actions in the Climate adaptation plan to facilitate tree planting.</p> <p>5.This is addressed in Section 9.2.5.1, Volume 1.</p> <p>6.This must be assessed on a case by case basis with each planning application. A blanket requirement would not be practical.</p> <p>7. Waste disposal is not a service that the Council is directly involved in and private sector proposals for such a facility would be assessed on its merits.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>10.KCC to recognise and further develop the many societal and health benefits of increasing citizen participation, learning and understanding in biodiversity, nature and growing food.</p> <p>11.KCC and appropriate stakeholders would explore an expanded conservation management plan for the Newpark Fen and incorporate the wet woodlands owned by Kilkenny College with public access.</p> <p>The following for the River Nore:</p> <p>12.Development of a Boat House and Jetty as a river amenity within the City</p> <p>13.Provision of additional boat slips offering controlled boat and kayak access</p> <p>14.Provision of a white water and slalom kayaking amenity at Lacken Weir.</p> <p>15.Opening up vistas of the river from the Bishops Meadows Linear Park in line with local residents wishes</p> <p>The following for the Rivers Bregagh and Pockocke:</p> <p>16.KCC establish Local River conservation groups to restore Good Ecological Status.</p> <p>17.Restoration of Good Ecological Status to be achieved prior to commencement of any riverside-associated residential development</p> <p>18.Develop appropriate access to and from River Bregagh and Pockocke</p>	<p>8.This can be included as part of the review of the Local Area Plans in the County</p> <p>9.This is addressed in Section 9.2.9, Volume 1</p> <p>10.Noticed</p> <p>11.The Newpark Fen is protected under the policies and objectives of the Plan. The upgrading of the facility for recreation purposes is an operational and budgetary issue.</p> <p>12.The future development and improvement of river corridors is set out in Section 6.8, Volume 2</p> <p>13.This is addressed in Objective C6O, Volume 2</p> <p>14. This is not a priority for the Council at this time and is considered a resource and budgetary issue..</p> <p>15. Open of vista's can be examined at any time. This is operation issue for the Parks Department.</p> <p>16.Development of the River Bregagh and Pockocke is addressed in Section 6.8.1.3</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>19.Explore feasibility of Pocock riverside walkway from the Sion Rd to Johnswell Rd roundabout</p> <p>20.Undertake survey and installation of attenuation ponds to intercept runoff and silt running from the Ring Rd into the River Pococke.</p> <p>Transport</p> <p>21.Request for KCC to follow evidence based best practice of reducing car use and prioritising more sustainable forms of transport</p> <p>22.Creation of new cross river cycle and pedestrian links</p> <p>23.Scope out the provision of pedestrian access along the eastern bank from Greensbridge to Talbots Inch</p> <p>Sustainable Tourism</p> <p>24.Introduce composting bins in public areas</p> <p>25.Encourage provision of package free food and sustainable alternatives at public festivals and events</p> <p>26.Provide drinking fountains in the City</p> <p>27.Include tree planting and maximum biodiversity gain as an integral part of good street design.</p>	<p>17. Restoration of water quality is an objective of the Water Framework Directive and there are policies in the Plan to protect and enhance water quality and mitigate the impact of development on water quality.</p> <p>18. & 19 There are policies and objectives to develop these areas as riverside parks.</p> <p>20 This is an engineering operation issue.</p> <p>21.A Transport Plan is being prepared for the City and will include recommendations</p> <p>22.Proposed pedestrian links and crossings is set out in Section 5.6.4, Volume 2</p> <p>23.This is addressed in Objective C5O, Volume 2</p> <p>24. – 27 Each suggestion is noted and will be encouraged through information and education programmes.</p>
KK-C162-384	Cummins & Voortman on behalf of Canview Ltd	<p>1.Proposes zoning for mixed use in underused quarry outside Johnstown to provide for Anaerobic Digestion Plant, off-grid hydrogen power plant and hydrogen conversion facility for farming machinery and a series of light industrial buildings for compatible use and allow the</p>	<p>1.The area outside Johnstown where the worked-out quarry is located is an unzoned agricultural area and all applications for the uses proposed in such areas are considered on their own merit. The proposed uses will be considered in the</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		creation of a local enterprise area to be implemented over the next 20 years, starting with a solar farm.	course of an application for same under the Planning and Development Act.
KK-C162-385	Eamon Holden	1.This submission relates to the Wind Energy Strategy and objects to the change in designation for the lands in their area (Corbally, greater Piltown and Templeorum). See discussion under Section 3.3 Templeorum.	1.See discussion under Section 3.3 Templeorum below.
KK-C162-386	Failte Ireland	<p>1.Failte Ireland requests that the Ancient East branding logos for these initiatives are included in Plan to increase brand awareness in the Development Plan.</p> <p>2.The Development Plan does not present a clear strategy for tourism and a dedicated tourism chapter is required for a comprehensive strategy for the City and County. Failte recommends a Tourism Chapter/chapter(s) that: (a) encompass all of the policies and objectives relating to this important economic driver, building on the actions and objectives set out in the wider Development Plan and (b) recognise the significant role that tourism plays in the overall operation and development of the City and County.</p> <p>3.The plan should place a stronger emphasis on 'Sustainable Tourism', 'tourism that takes full account of its current and future economic social and environmental impacts...." Tourism development must be balanced with the protection of the natural environment</p>	<p>1.Branding is not considered appropriate for the Development Plan.</p> <p>2.Tourism is an economic driver for the City and County and Tourism is interspersed in more than one chapter. As such the Plan does not require a separate tourism chapter. Tourism is incorporated in Sections 5.2.5 of Volume 1 and 3.2 of Volume 2. The Plan supports the Government's Tourism Strategy, People, Place, Policy – growing tourism to 2025 and Kilkenny's Statement of Tourism Strategy and Work Programme as well as setting out tourism policy and objectives for the City in Section 3.2 of Volume 2, which references various city initiatives.</p> <p>3.Recommendation: It is recommended that sustainable tourism be referenced in Section 5.2.5 as <i>'tourism that takes full account of its current and future economic social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities'</i>.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>4. Fáilte Ireland request specific reference to Fáilte Ireland Destination Experience Development Plans (DEDPs) and request an objective acknowledging and supporting these plans with objectives supporting continued collaboration with Fáilte Ireland and tourism stakeholders.</p> <p>5. The submission requests that policy be inserted in Section 8.4 to support the expansion of the greenway network.</p> <p>6. It is suggested that Kilkenny Food Vision 2020 – 2025 should be specifically referenced in the Development Plan alongside support for developing food tourism and a food network.</p> <p>7. The Council should reference this Plan the three-year Destination Marketing, Sales and Revenue Growth Plan for Kilkenny City and County that seeks to deliver growth in</p>	<p>4. Recommendation: To include the following text in Section 5.2.5, <i>"To support the delivery of Destination Experience Development Plans through continued collaboration with Fáilte Ireland."</i></p> <p>5. Recommendation: To insert the following text in Section 8.4 <i>"The Council will support the progression of long-distance linear greenways and greenway town networks, and the further development and improvements of cycling and walking trails and paths in County Kilkenny, and the provision of appropriate services along these trails, and for the development of linkages between these trails and adjoining counties."</i> Also see recommendation under KK-C162-315 Kilkenny Cycling and Walking Campaign)</p> <p>Recommendation: To insert the following in Section 5.2.5 <i>"The Council will support cycle and walking tourism initiatives, in tandem with the development of greenways and blueways in the County."</i></p> <p>6. Recommendation: It is recommended that <i>Food Vision 2020-2025</i> be referenced in section 5.2.5.</p> <p>7. This is not a Development Plan issue</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>international visitors and room nights for the City and County that was completed in 2019</p> <p>8. That proposed wording for a policy to support the improvement of tourism infrastructure at appropriate locations be inserted into the plan.</p> <p>9. Fáilte Ireland requests the inclusion of a map showing key nodes, transport links, tourism centres, sensitive Environs, areas of unrealised potential and branding be included in the plan, similar to figure 4.2.</p> <p>10. The submission recommends changing the text of the focus issues listed in section 5.2.8 and 5.2.9 and Objective 5E with specific wording to broaden the objective</p>	<p>8. Recommendation: That a new policy should be inserted into section 5.2.5 <i>"To support the provision and improvement of visitor facilities, infrastructure and accommodation (including self-catering, hotels, hostels, guesthouses, B&Bs, caravanning, camping, motorhome service areas and glamping) at appropriate locations, preferably clustered within existing settlements, in order to provide a range of accommodation type to suit all visitors."</i></p> <p>9. This is not required as part of the Plan. The Core Strategy map is sufficient.</p> <p>10. Recommendation: That the following changes (in bold) be made to Section 5.2.8 and 5.2.9-</p> <ol style="list-style-type: none"> 1. <i>Developing and adding depth to Kilkenny's Tourism Experience by implementing the Orientation and wayfinding plan for Kilkenny through both approved Destination towns funding and other funding streams.</i> 2. Section 5.2.8- 'Use the new Kilkenny – Best of Ireland brand, the Outdoor Kilkenny and Taste Kilkenny brands and visit kilkenny.ie website to attract more visitors to Kilkenny'. 3. Section 5.2.9- to include the following text: <i>"To develop Kilkenny City and County as a leading tourism destination through continued sustainable</i>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		11. Failte Ireland recommends the inclusion of the following proposed new policies, to be inserted in Section 9.3, which deals with Built Heritage	<p><i>expansion of the tourism sector, with a focus on creating high-quality visitor services and the continued development and enhancement of visitor attractions and activities, capitalising on our natural and cultural heritage assets, whilst safeguarding these resources for future generations".</i></p> <p>4. Objective 5E: add to the end of sentence <i>-The Council will ensure that the maintenance, cleanliness, and animation of public spaces is managed in order to encourage visitors to dwell more in these spaces.</i></p> <p>Although the plan supports measures to counter dereliction, the use of buildings and structures for the promotion of the tourism product should be specifically promoted.</p> <p>11. Recommendation: To include the following two policy statements in Section 9.3:</p> <ul style="list-style-type: none"> • <i>"The Council will encourage the sensitive redevelopment and / or return to suitable use, of derelict, vacant or redundant buildings, in appropriate locations in order to provide for visitor accommodation and tourism development, while having regard to ecological constraints and architectural heritage requirements.</i> • <i>The Council will encourage the reuse and refurbishment of vernacular buildings (houses or farm/ industrial buildings) in appropriate locations for tourist related facilities, including holiday home accommodation. The development shall relate</i>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>12.The following should be included in Section 5.7.1.3., Volume 2 of the Plan. The Placemarque Orientation Study recommends creating a permanent coach park in Irishtown to support the Irishtown and Abbey Quarter areas and this should be incorporated into this Section.</p>	<p><i>in scale to the site's characteristics and location, shall not be detrimental to the rural amenity of the surrounding area and be in accordance development standards of this plan, particularly as they relate to the protection of the natural and built environment."</i></p> <p>12.Section 5.7.1.3 recognises the need for a temporary coach park. The establishment of a permanent coach park should however also be a longer-term objective of the plan.</p> <p>Recommendation: That an objective be included in Section 5.7.1.3 for the location of a permanent Coach Park to Serve Irish Town and the Abbey Quarter.</p>
KK-C162-387	Kelleher Architecture on behalf of Messrs	<p>1.The subject lands, 2.38ha in extent, are located on high ground to the west of Kilkenny City Centre at Drakelands Lower, Kilmanagh Road, Kilkenny, adjacent to Drakelands Nursing home.</p> <p>2.The submission sets out the extensive planning history of the site and adjacent nursing home.</p> <p>3.Submission sets out the Housing Demand figures, the requirement for compact growth, the Regional policy context, previous phase two designation, location within the Western Environs, infrastructure prerequisites for the development of parcel A.</p>	<p>The lands the subject of the proposed zoning are within the original Western Environs LAP.</p> <p>The lands are located within Parcel A of the Plan.</p> <p>The release of Parcel A for development is premature at this stage of the development of the Breagagh Valley(Western Environs)</p> <p>Recommendation: No Change</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>4.The zoning of subject site has been changed from "Phase 2 Residential" to "Agricultural". This is a material change to the previous Development Plan and our client wishes to strongly object to this change.</p> <p>5.The submission refers to the lack of housing supply. The requirement for housing and associated Infrastructure for future jobs, the anticipated population growth, the reduction in household size and Eurostat "Household composition statistics" assumes an average occupancy rate of two persons per residential unit. Combining demand factors suggests that 2,886 to 3,443 housing units are required in Kilkenny by 2026.</p> <p>6.The submission states that there is insufficient land zoned for residential development within the Kilkenny City area to provide housing for the projected population increase of 3,641 persons to 2027 based on average occupation levels per housing unit and the development of the Western Environs should be prioritised.</p>	
KK-C162-388	John and Alice Culleton	1.This submission relates to the Wind Energy Strategy and objects to the change in designation for the lands in their area (Templeorum). See discussion under Section 3.3 Templeorum.	1. See discussion under Section 3.3 Templeorum.
KK-C162-389	Cllr. Martin Brett	1.This submission relates to the Wind Energy Strategy, in particular the development proposed for Castlebanny. The submission proposes a setback for turbines to be situated	1. See discussion under Section 3.2 in relation to Castlebanny and setback distances.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		10 metres from a residential property for every metre in height of the turbine, i.e., 1,000 metres setback for a hundred metres in height.	
KK-C162-390	Sheehy Pharmacy	<p>1.Concern raised that under Submission KK-C162-124, the developer of the Primary Healthcare Centre now asks for a change in the zoning of its property to Neighbourhood Centre to allow for the introduction of commercial uses. Such change to the zoning would be inappropriate and at odds with the spirit of the material contravention of the current Development Plan.</p> <p>2.The Planning Authority should focus on the proper planning and development of the wider area and consider how the introduction of commercial uses at the Healthcare Centre would undermine the viability and sustainability of the Newpark Neighbourhood Centre.</p>	<p>1.Permission has been granted for the Primary Care unit. The unit is now constructed and open and is operating with various health care uses. It will integrate into the Newpark Neighbourhood centre over time.</p> <p>If the current zoning of the primary care unit remains then each and every new of use to go into the centre could in theory contravene the open space zoning of the site. This would make the operation of the unit impractical.</p> <p>2.The zoning of the primary care unit site to be changed to Neighbourhood zoning</p> <p>Recommendation: Change the site of primary care unit site (buildings and car park (as defined under ref 18/59) to Neighbourhood centre)</p>
KK-C162-391	EDF Renewables Ireland	<p>This submission relates to the Wind Energy Strategy, and is from EDF Renewables Ireland which is a utility and renewable energy developer.</p> <p>1.The submission requests that the Council provide sufficient flexibility surrounding the development of wind energy as:</p>	<p>1. The Draft Wind Energy Strategy (WES) was formulated in line with the Wind Energy Guidelines and the Draft <i>Wind Energy Development Guidelines</i>²⁸, which recommend that a strategic approach be taken to identify the areas within the county where various scale wind energy developments would be considered. This offers clarity to applicants, and also, in</p>

²⁸ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

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		<ul style="list-style-type: none"> the energy targets as set out will not be met as there are many constraints operating to reduce the area available to wind farms, including setback distances from residences, and project specific environmental/planning constraints. The figures outlined in the Draft of a total land area in Acceptable in Principle of 50,000ha is an over-estimation. The submission includes constraints mapping in support of their contention, which shows that the actual areas of viability for wind energy projects is greatly reduced from the theoretical resource once constraints have been applied, The DWES (contained in Appendix K) states that both the Acceptable In Principle and Open for Consideration areas are broadly identified as having no significant conflicts with environmental designations or sensitivities, A number of Planning Authorities (they cite Cork's Development Plan 2014) have a built-in level of flexibility within their policy which allows sites to be considered on a case-by-case basis in which the onus is on the applicant to prove that the proposed development would not harm the receiving environment, 	<p>combination with other Renewable energy sources, will contribute to Kilkenny meeting its stated targets. Areas of the county with highest wind speed have been strategically targeted for large scale wind energy developments. See Section 3.4 Targets for a discussion of the capacity of the total area of land designated.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<ul style="list-style-type: none"> Wind energy developments will be inappropriately constrained based on broad stroke strategic level designations, and the designation of restricted areas of Kilkenny is unnecessarily extensive due to the high level strategic approach taken during the sieve analysis, the strategic level assessment should be a guide to channel development proposals, and identify environmental sensitivities, but it should not be used as a significant policy impediment or a pre-determinant of the outcome of the EIA and planning processes. <p>Specifically, they request that a note be added to Table 11.3 to allow for individual sites to be considered on their own merits, if they can demonstrate no significant adverse impacts on identified environmental sensitivities in the Wind Energy Strategy.</p> <p>2.The submission seeks a change in the definition of "Large Scale Wind Energy Developments" (>5MW, and in excess of 65m hub heights) as they perceive this is an artificial and inappropriate restriction, as a typical wind turbine ranges between an output of 4.5MW to 5.5MW. This also feeds an inappropriate public perception that 5MW wind farms are in fact large.</p>	<p>2. A strategic approach has been taken to the identification of areas for all scales of wind energy developments, in line with the Draft <i>Wind Energy Development Guidelines</i>²⁹. This has identified the areas of the county most suitable for large scale wind energy developments, based on a number of factors. It is considered prudent to take a strategic approach,</p>

²⁹ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

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		<p>3.The submission points out a discrepancy between the content of Table 11.3 of the Draft Plan (https://consult.kilkenny.ie/en/consultation/kilkenny-city-and-county-draft-development-plan-2021-2027/chapter/1152-wind-energy-development-strategy) and that shown in Table 11.3 of the Innovision virtual consultation text: https://tours.innovision.ie/v/ydjWAg40132.</p> <p>4.The area of Brandon Hill was designated as Not Normally Permissible based on a broad stroke strategic designation</p>	<p>and encourage large scale developments into those areas designated as Acceptable in Principle, rather than allowing a widespread dispersal of large scale developments. Smaller scale developments can also apply in the areas designated as Open for Consideration.</p> <p>The threshold of 5MW is in line with both the Planning and Development Regulations³⁰ threshold for an Environmental Impact Assessment, and also the current Renewable Energy Support Scheme (RESS), for which the threshold generation for the Community category is less than 5MW.</p> <p>3. The Innovision website was an additional consultation tool, to encourage further engagement with the Draft Plan. This included a synopsis of each chapter of the Draft, but was not intended as a replacement for the Draft Plan. Unfortunately there was an error in Table 11.3 of the virtual room, and this has since been rectified, to ensure it reflects the Draft Plan accurately.</p> <p>4.Step 2 of the <i>Guidelines</i>³¹ require the utilisation of an evaluation of the landscape and its sensitivity for wind energy</p>

³⁰ Schedule 5, Part 2, 3 Energy Industry, (i) Installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts.

³¹ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

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		<p>of elements, including landscape, which have not taken account of the finer grain, site-specific and more detailed analyses that can be provided through the EIA and AA processes. In this area, there has been an increase of the 'not normally permitted' designation, which they perceive as being due to landscape.</p> <p>5. It is requested that Table 11.3 be amended to include Large Scale Wind Energy Developments (>5MW) in areas designated as 'Open to Consideration', as the 'Open to Consideration' areas are broadly identified as having no significant conflicts with environmental designations or sensitivities.</p> <p>6. The WES in Appendix K notes that Not normally permissible areas have the ability to accommodate community led wind farm initiatives.</p>	<p>developments. On this basis, areas designated as "Highly Scenic and Significant Visual Amenity Value", which includes the Brandon Hill Uplands, were given an exclusion weighting (see Section 3 Wind Energy strategy). The area designated as Not Normally Permissible has not been increased, as the entire area around Brandon was also Not Normally Permissible in the 2014 Plan.</p> <p>5. The threshold of 5MW is in line with both the Planning and Development Regulations³² threshold for an Environmental Impact Assessment, and also the current Renewable Energy Support Scheme (RESS), for which the threshold generation for the Community category is less than 5MW.</p> <p>6. This line will be deleted from Appendix K. See Section 3 Wind Energy Strategy.</p>
KK-C162-392	P&M Cantwell	<p>1.Pat and Mark Cantwell are seeking sufficient lands zoned "residential" to allow for the realisation of the small cluster of semi-detached housing or for low-density housing/ services sites to the Northwest of Loughmacask.</p> <p>2.Submission also raises concern over its future ability to access the farm via Lousybush Lane, once the new CBS school is developed.</p>	<p>The location of the proposed semi- detached cluster is outside the current zoned area into greenfield lands.</p> <p>There is an existing dwelling and outbuildings at this location immediately adjacent to the existing built up area. These existing buildings/dwelling can be included into the existing residential zoning to allow for redevelopment. No new greenfield lands to be zoned.</p>

³² Schedule 5, Part 2, 3 Energy Industry, (i) Installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts.

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			Recommendation: Include existing footprint of dwelling and outbuildings into existing residential zoning.
KK-C162-393	James Stephens Squash Club	<p>1.Current Facilities are closed and has limitations</p> <p>2.The club has an ambition to explore development options to progress the squash club for the benefit of all generations and abilities by creating an interactive squash court, that has benefits beyond fun & learning squash, including as an inclusive developmental aid.</p>	Although the Plan does not designate lands or procure sites for facilities in smaller towns, section 8.5 includes the policy of the Council to co-operate with local sporting organisations and to enter into joint ventures where appropriate for the provision of such facilities.
KK-C162-394	Atlantic Infrastructure Partners	<p>This submission relates to the Wind Energy Strategy, and is from Atlantic Infrastructure Partners who are particularly interested in the designations of the wind energy strategy for the north west of the county.</p> <p>1. It is requested that Kilkenny County Council set an ambitious climate action and renewable energy policy framework within the County Development Plan.</p> <p>2. The submission requests that the Council use the Wind energy Strategy as a guidance document, while allowing individual projects the opportunity to prove their suitability through the Environmental Impact Assessment and Appropriate Assessment processes, as:</p>	<p>1. Noted, the Council has set out an ambitious target, see Section 3.4 Targets.</p> <p>2. The Draft Wind Energy Strategy (WES) was formulated in line with the Government <i>Guidelines</i>³³, which recommend that a strategic approach be taken to identify the areas within the county where various scale wind energy developments would be considered. This offers clarity to applicants, and also, in combination with other Renewable energy sources,</p>

³³ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

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		<ul style="list-style-type: none"> • this places the onus on the applicant to prove the suitability of the development without being considered unacceptable due to a strict application of strategic level constraints, • The WES is over restrictive, • the energy targets as set out will not be met as there are many constraints operating to reduce the area available to wind farms, including setback distances from residences, and project specific environmental/planning constraints. The figures outlined in the Draft of a total land area in Acceptable in Principle of 50,000ha is an over-estimation. The submission includes constraints mapping in support of their contention, which shows that the actual areas of viability for wind energy projects is greatly reduced from the theoretical resource once constraints have been applied, • A number of Planning Authorities (they cite Cork's Development Plan 2014) have a built-in level of flexibility within their policy which allows sites to be considered on a case-by-case basis in which the onus is on the applicant to prove that the proposed development would not harm the receiving environment. 	<p>will contribute to Kilkenny meeting its stated targets. Areas of the county with highest wind speed have been strategically targeted for large scale wind energy developments, and these areas have been increased since the 2014 Strategy. See Section 3.4 Targets for a discussion of the capacity of the total area of land designated.</p>

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		<p>3. The definition of Large Scale Wind farms as being >5MW and their restriction only to Acceptable in Principle areas should be reconsidered as:</p> <ul style="list-style-type: none"> a typical wind turbine has an output of between 4.5MW to 5.5MW, and a single or two turbine proposal would easily exceed the 5MW threshold set in the DCDP and restrict the project to only being considered appropriate to Acceptable in Principle areas. The DWES (contained in Appendix K) states that both the Acceptable In Principle and Open for Consideration areas are broadly identified as having no significant conflicts with environmental designations or sensitivities. <p>4. The submission points out a discrepancy between the content of Table 11.3 of the Draft Plan (https://consult.kilkenny.ie/en/consultation/kilkenny-city-and-county-draft-development-plan-2021-</p>	<p>3. A strategic approach has been taken to the identification of areas for all scales of wind energy developments, in line with the Guidelines. This has identified the areas of the county most suitable for large scale wind energy developments, based on a number of factors. It is considered prudent to take a strategic approach, and encourage large scale developments into those areas designated as Acceptable in Principle, rather than allowing a widespread dispersal of large scale developments. Smaller scale developments can also apply in the areas designated as Open for Consideration.</p> <p>The threshold of 5MW is in line with both the Planning and Development Regulations³⁴ threshold for an Environmental Impact Assessment, and also the current Renewable Energy Support Scheme (RESS), for which the threshold generation for the Community category is less than 5MW.</p> <p>4. The Innovision website was an additional consultation tool, to encourage further engagement with the Draft Plan. This included a synopsis of each chapter of the Draft, but was not intended as a replacement for the Draft Plan. Unfortunately there was an error in Table 11.3 of the virtual room, and this</p>

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		<p>2027/chapter/1152-wind-energy-development-strategy) and that shown in Table 11.3 of the Innovision virtual consultation text: https://tours.innovision.ie/v/ydjWAg40132.</p> <p>5. The area of Spa Hill and Clomantagh was designated as Not Normally Permissible, based on a broad stroke strategic designation of elements, including landscape, which have not taken account of the finer grain, site-specific and more detailed analyses that can be provided through the EIA and AA processes. It is considered that there are a number of areas located within this vicinity, which on a site specific basis could be wholly appropriate and the Council should allow for applicants to demonstrate that significant impacts will not arise on specific sites.</p>	<p>has since been rectified, to ensure it reflects the Draft Plan accurately.</p> <p>5. Step 2 of the Guidelines require the utilisation of an evaluation of the landscape and its sensitivity for wind energy developments. In the WES, Spahill and Clomantagh were identified as an area of natural and cultural heritage features, and was given an exclusion weighting (see Section 3 Wind Energy strategy).</p>
KK-C162-395	Eurospar	<p>1.A Primary Care Centre (PCC) is currently under construction adjacent to the Newpark Shopping Centre. As submission has been submitted to have the site of the Health Care Centre rezoned. The suggested re-zoning contained in the developer's submission would conflict with existing uses within the area, not be best advantage to the community and not be inclusive of the promotion of the neighbourhood concept. The PCC consists of floor area of 4,900m², which would significantly increase the size of the neighbourhood centre by 50%.</p>	<p>1.The primary Care Building was granted permission by Material Contravention procedure under planning ref 18/59. The building is now constructed and is the commissioning phase of development.</p>

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		<p>2.The submission states that the change in zoning has the potential to impact on the viability of the existing neighbourhood centre</p> <p>3.Submission request that the subject lands be maintained as Amenity/Green links/Biodiversity conservation/ Open Space/Recreation.</p>	<p>2.As part of this CE's report it is proposed to zone the building area of the Primary Care Unit for neighbourhood uses which will facilitate the uses proposed in the development. (see also KKC162-439 & 390)</p> <p>3.Recommendation: Change the site of primary care unit site (buildings and car park (as defined under ref 18/59) to Neighbourhood centre)</p>
KK-C162-396	IDA	<p>1.It is submitted that the review of the Ferrybank- Belview LAP should be carried out as soon as feasible once the transport proposals for the Ferrybank/ Belview area have been finalised under the Metropolitan Transport Strategy to be prepared.</p> <p>2.Chapter 5 -It is requested that this section of the plan be updated to include the Local Authority's overall economic strategy and take account of the IDA's "Driving Recovery and Sustainable Growth Strategy 2021-2024" and Future Jobs Ireland 2019: Preparing Now for Tomorrows Economy.</p> <p>3.Objective 5A and 5B should be expanded, or a new objective included that seeks to provide and support the provision and improvement of infrastructure to facilitate economic development i.e. water, wastewater, transport (including roads and footpath/cycle routes) and communications infrastructure.</p>	<p>1.Objective 4I sets out the Council's intention to review the Ferrybank/Belview Local Area plan with due regard to the Waterford Metropolitan Area Strategic Plan and to incorporate same into the County Development Plan by way of variation.</p> <p>Recommendation: Insert a timeline for the commencement of Objective 4I 6 months from the coming into effect of the Plan.</p> <p>2. A clear economic strategy is outlined in the Plan which takes account of the National, Regional and local policy.</p> <p>3.The provision of water and wastewater is the responsibility of Irish Water, but it is policy for Kilkenny County Council to work with Irish Water to identify investment priorities. The Kilkenny City Local Transport Plan and the proposed walking and cycling strategies for the County will address walking and cycling links, including to areas of employment.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>4.Objective 5I is welcomed but an objective should be included to foster linkages between industry and education within Kilkenny.</p> <p>5.The submission lists Roads priorities for Kilkenny city and the Belview Area already in the draft plan and requests that the upgrades to Abbey Road in Ferrybank must be prioritised.</p> <p>6.Section 2.9.19 of the Draft Plan - It is submitted that the IDA Business and Technology Park and lands at Loughboy is another strategic employment location that requires sustainable transport interventions.</p> <p>7.The submission lists substandard pedestrian and cycling infrastructure towards their business parks and delays on the Bohernatounish road and in Loughboy. The provision and improvement of the pedestrian and cyclist network in strategic employment areas, these routes should be indicated on Map MS3 Cycle and Pedestrian Infrastructure contained within the draft plan.</p> <p>8.The delivery of the Kilkenny Ring Road extension is a vital piece of infrastructure that must be delivered in the short term but the IDA are concerned that the ring road will not be completed in the short to medium term, prolonging traffic congestion.</p>	<p>4.Recommendation: It is recommended that objective 5I be expanded to include " .. <i>and to encourage the fostering of links between industry and education within Kilkenny.</i>"</p> <p>5.These projects are already mentioned in the plan and the upgrade of the Abbey Road will be addressed in the review of the Ferrybank/Belview Local Area Plan.</p> <p>6.Objective C5H, Volume 2, aims to improve and enhance the pedestrian and cycling routes in accordance with the Kilkenny Local Transport Plan, which will address walking and cycling links, including to areas of employment.</p> <p>7.The delays are traffic management issues and in the absence of an adopted Local Transport Plan for the City, Figure MS3 remains incomplete. See objective C5H, Volume 2, in this regard. The Kilkenny City Local Transport plan will have a comprehensive map indicating the proposed walking and cycling infrastructure.</p> <p>8.The completion of the Kilkenny Ring Road is priority project for the Council. Objective 12AD requires the reservation of the proposed line of the Northern Ring Road Extension and progressing it through planning.</p>

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		9.The plan should include as a strategic objective to be prioritised the provision and improvement of appropriately designed and accessible infrastructure for walking and cycling in employment areas.	9.The provision and improvement of infrastructure for walking and cycling in employment areas will be considered in the Kilkenny Local Transport Plan. Objective 12AF is to implement the recommendations of the Kilkenny Local Transport Plan.
KK-C162-397	Cllr Patrick O'Niell	<p>1.Include provision in the plan for feasibility studies around a pedestrian crossing over the River Nore in Bennettsbridge.</p> <p>2.Make it a deliverable goal in the plan to create a river access point in Bennettsbridge in order to maximise the benefit of the natural resource for locals and visitors.</p> <p>3.Serviced sites should be accommodated within existing zoned residential lands or on lands immediately adjoining the development boundary of our rural towns and villages, subject to normal planning considerations.</p> <p>4.More consideration needs to be given to proposed 2 storey developments in keeping with the traditional 2 storey farmhouses in rural Ireland.</p> <p>5.That plan should make provision for a more detailed and deliverable rural tourism policy that includes more walking and cycling facilities in rural areas, improving connectivity between villages and coming up with a detailed marketing</p>	<p>1.Introduce an objective for a mobility study for Bennettsbridge.</p> <p>2.There are overarching policies in the Plan that provide for access and exploitation of amenities generally within the County and particularly for the River Nore (River Nore linear Walk).</p> <p>3. There is a policy for serviced sites (Objective 4J 4K, & 4L and though Development Management requirements in Section 4.8 of the Plan</p> <p>4.Two storey houses are considered appropriate in rural areas. Detailed guidance is given on this in the Council's Rural Design Guide which is available free of charge to design practitioners and the public in general.</p> <p>5.The Plan does contain objectives for enhanced tourism objectives particularly in relation to areas such as Castlecomer Discovery Park, Woodstock and enhanced policies for walking and cycling activities throughout the County with particular</p>

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		<p>plan on all the offerings that our rural towns and villages have.</p> <p>6.Under section 11.5 Wind the submission proposes that the designation in the Castlebanny area be left at "open for consideration" due to the lack of public consultation possible in the current climate and due to the sheer scale and volume of the proposed turbines in the area. No changes should be made in this regard until the new Wind Energy Development Guidelines are adopted.</p> <p>7.The Plan should include a policy around setback from any proposed turbines in the county. I would propose a policy similar to what was adopted by Westmeath County Council where there is a minimum 10m setback per 1m of turbine height to the nearest dwelling.</p> <p>8.It should be a deliverable goal in the plan to help provide sporting facilities across all communities where population growth is expected into the future in order to ensure communities have access outdoor and indoor recreation.</p>	<p>reference to the Greenway project and development of linkage to that and existing tourist facilities.</p> <p>6 &7 It is not proposed to revert back to the open for consideration provision for wind energy development at Castlebanny nor is it recommended to include for a setback from individual turbines other than what is provided for in the Draft Wind Energy Guidelines.</p> <p>8. The provision of sporting facilities aligned to the growth in population is provide for in the Plan.</p>
KK-C162-398	Margaret Doyle	<p>1.The proposal is for 4 acres of land to be included in the Urlingford Boundary. The land is strategic in nature and in close proximity to the town centre.</p> <p>2.The site is only 200m away from the main street and less than 500m walking distance to Urlingford School. A public footpath from the main street Urlingford extends to within</p>	<p>1.The land is already included in the proposed Urlingford boundary.</p>

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		30 metres of the site Service such as water, sewage and street lighting are all within 20 metres of the site	
KK-C162-399	Synergy Group Castlecomer	<p>1.The submission strongly advocates for the inclusion of a new greenway from Kilkenny City to Castlecomer This linkage could become one of the most used greenways in the Country, given the quality destinations en route such as Jenkinstown Park, Dunmore Cave and Castlecomer Discovery Park.</p> <p>2.The submission requests that a full traffic management plan is considered with input from local business and residents.</p> <p>3.Castlecomer needs both an immediate response to up its options and to plan to install a fibre optic loop in the non-National Broadband Plan area.</p> <p>4.Synergy requests the Council keep the continued expansion of the capacity of the waste water facility to cater for the planned and potential residential and commercial development of the town.</p>	<p>1.Recommendation: See submission ref. KK-C162-20 Eastern Midland Regional Assembly (EMRA). It is recommended that the following statement be inserted: "The Council will investigate the potential of developing a Greenway from Kilkenny to Castlecomer and Ballyragget and onwards to Portlaoise as part of the development of Greenways and Blueways within the County."</p> <p>2.Funding for a Traffic Management plan for Castlecomer has already been approved.</p> <p>3.Work is ongoing to find an optimal mast location for wireless Broadband in Castlecomer and the Council continues to work with Service providers to promote the installation of broadband mobile throughout Castlecomer.</p> <p>4.Water and Wastewater capacity planning is a matter for Irish Water. Castlecomer is being prioritised under the National Water Resource Plan and funding may be included in the 2025-2029 programme.</p>
KK-C162-400	Lidl	<p>The submission raised the issues as follows:</p> <p>1.Realign the zoning boundaries at Lidl, Waterford Road-Lidl have also purchased an adjoining property (R95 WFK0)</p>	1 & 2 No objection to the realignment of the zoning objective to accord with the current planning application 20/619

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		<p>to facilitate the expansion of the existing store, primarily in terms of allowing a rationalisation of the existing southern site boundary which follows an inefficient alignment. The Planning Authority are requested to amend the zoning boundary to reflect the proposed expansion of the Lidl site, to ensure that the forthcoming plan accurately reflects intended Lidl curtilage / demise.</p> <p>2.Change the (realigned) zoning objective at Lidl, Waterford Road for the extended site from General Business to Neighbourhood Centre to serve Loughboy;</p> <p>3.Change the zoning objective at Lidl, Johnswell Road from General Business to Neighbourhood Centre; This store also functions as part of a city Neighbourhood (Newpark), and should similarly be formally recognised as playing a role in providing convenience / food facilities in the area, complemented by the adjacent Newpark Shopping Centre.</p> <p>4.Modify the Neighbourhood Centre zoning objective., The Neighbourhood Centre zoning objective reference to 'local', is considered unnecessary, potentially misleading and somewhat misaligned to the Core Strategy. Wording for same is proposed in the submission, removing the word "local" and adding "convenience food "to the objective and "part off licence" to the permitted uses.</p> <p>5.Modify the Retail Hierarchy in respect of convenience / food shopping to align with the Kilkenny City Core Strategy</p>	<p>The site does not form part of the Neighbourhood centre for Loughboy no change recommended to the zoning obectgive.</p> <p>3. The Johnswell road site does not form part of the Newpark Neighbourhood centre. No change recommended.</p> <p>4.The neighbourhood centres are intended to serve the local neighbourhoods. It is not misaligned to the Core Strategy. No change recommended.</p>

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		<p>and the well-established concept of the four neighbourhoods based around the medieval city core, where they are currently in conflict / at cross purposes. Convenience/Food facilities are not 'out of centre' nor should they be classified as same, rather they should be classified as being other designated centres within the overall core / settlement strategy for the city. The City Centre Core, suited to higher order retailing and leisure / recreation / tourism uses and experiences than food/convenience. Explicit delegation of the somewhat 'lower order' of retailing that is convenience retailing, to Neighbourhood Centres is necessary.</p> <p>The following specific changes should be made to the Draft City & County Development Plan and accompanying retail strategy:</p> <p>6.The Retail Hierarchy (e.g. Table 3.1 of City Development Plan) should clarify that Kilkenny City Centre is at Level 1 in relation to Comparison / high order goods and Level 4 in relation to Convenience / lower order goods</p> <p>7.Policy 4 of the City & County Development Plan should be amended to refer to a 'retail centre' first approach (i.e. be it City or Neighbourhood Centre, dependent on the type of retail proposed), to recognise that numerous centres exist and no one centre should be prioritised over another (in the case of Convenience / lower order goods);</p>	<p>5. In line with the Retail Planning Guidelines and the Town Centre first policy the primacy of the City Centre Core all retailing is considered necessary.</p> <p>6.The City centre is at level 1 for all retailing.</p> <p>7. Town centre first is the approach which has been developed at National Regional and local level.</p>

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		<p>8.To insert a new Retail Objective in Section 5.4.6 / 3.4.4 (5na/iiia) of the City & County Development Plan, with the following wording, or similar wording, as appropriate: "To sustain and enhance the vitality and viability of the four Kilkenny City Neighbourhoods and their convenience retail offer, alongside the City Centre core, and to support their continued growth in accordance with the Core Strategy and the Sequential Approach."</p> <p>9.Amend Section 5.4.5 / 3.4.3 of the County and City Retail Strategies where they refer to the City neighbourhood retail provision as being 'out of centre' retailing, and change commentary therein. Wording proposed.</p>	<p>8 & 9 The neighbourhoods are identified to service their local areas. They are not intended to grow to service areas beyond their neighbourhood in competition with the city centre.</p> <p>Recommendation: Realign the commercial zoning of the site to facilitate the expansion proposed under planning ref 20/619.</p>
KK-C162-401	Jimmy Walsh	<p>This submission relates to a number of issues as follows:</p> <p>1.The Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.</p> <p>2.That Kilkenny County Council ensure the urgent rollout and provision of sufficient and reliable broadband and mobile services to the parish of Windgap and all communities.</p> <p>3.That an annual report be made on the state of protected structures to ensure that they do not deteriorate into ruins.</p>	<p>1. See discussion under Section 3.1 Lingaun Valley.</p> <p>2.The Council supports and will facilitate the rollout of the National Broadband Plan in accordance with National and Regional Policy. The Council will work towards the remedying of existing deficiencies as part of the NBP.</p> <p>3.The monitoring of protected structures is not a statutory obligation. Protected structures are in primarily in private ownership and the onus is on the owners to prevent deterioration. Save for channelling grant funding for the</p>

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		4.That a public campaign be launched against the indiscriminate littering and dumping from passing vehicles across the county.	remediation/restoration, the Council cannot remedy the deterioration of private structures unless they become dangerous. 4.The issue of litter is addressed in the Council's Litter Management Plan, which is currently under review.
KK-C162-402	Richard Kenneally	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-403	Sue Bowden	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-404	Southern Regional Assembly	See Section 2A above	
KK-C162-405	Breda Deasy	1.Chapter 7.5 of this Draft Plan inadequately addresses the health and wellbeing of the people living adjacent to quarries/borrow pits or working in quarries. Mentioning traffic, vibration, dust, noise, water pollution and visual intrusion is inadequate. 2.Codes of practice, guidelines and recommendations for noise and dust (incl. Silica), are not mandatory and	1.Applications are dealt with on a case by case basis in accordance with current Guidance from the EPA, the Department and NPWS. The Development Management Requirements listed in Section 7.5.2 deals with all potential impact. Larger quarries require a full Environmental impact Report and assessment. 2.Section 28 Guidance issued by the minister, such as the Quarries and ancillary Activities guidelines, is mandatory. Legislation and Regulation is however not a matter for the

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		<p>therefore unenforceable. We need enforceable legislation and regulation to monitor dust and noise levels.</p> <p>3.Submission raises concern that the restoration of closed or exhausted quarries are not adequately addressed.</p> <p>4.The multiple national agencies working independently e.g. Health & Safety Authority, Public Health Department, Environmental Protection Agency and Local Authority should work collectively to protect health.</p>	<p>plan. Permissions for such facilities do provide for monitoring of noise and dust.</p> <p>3.The Development Management Requirements in Section 7.5.2 require that all existing and future workings be rehabilitated. The restoration of closed or exhausted quarries is a matter for enforcement in accordance with conditions imposed under the relevant planning permissions.</p> <p>4.The Planning Authority consults all the relevant bodies in the course of assessing an application, on imposing and where required on implementing the relevant conditions.</p>
KK-C162-406	Kilkenny Chamber of Commerce	<p>1.The current housing stock is inadequate and this is proving to be an impediment in attracting potential new businesses and employers.</p> <p>2.Sites that will become available when schools move out to the Western environs may be suitable for residential uses and such redeployment possibilities must be fully explored.</p> <p>3.(a) Age friendly housing complexes should feature in the centre of the community</p>	<p>1.The Core Strategy for the City and County as revised provides for a total of 1627 houses in the City over the Plan period. Through its active land management policies is prioritising the activation of housing development in the City and County which will increase supply during the Plan period.</p> <p>2.Significant sites that become available within the Plan period will be examined for the most appropriate uses including residential.</p> <p>3.(a)Housing strategy encourages a broad range of housing types in all developments.</p> <p>3.(b) The provision of incentives such as tax breaks is not within the compass of the Development Plan. Policies are in place to make Town living attractive and there is the possibility</p>

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		<p>3.(b) Easement on complexities to bring above shop residential units back into use should be considered with incentives for owners</p> <p>4.Delivery of high-quality broadband and smart city measures must be prioritised. This will also facilitate Remote Working and Home-Based Economic Activity in Rural Areas.</p> <p>5.A joint retail strategy for the entire South East region is hugely important to ensure the viability of the City and County and to protect against outflows from Kilkenny, maintain inflows and avoid over saturation of retail floorspace within the region.</p> <p>6.The uniqueness of Kilkenny's independent and craft retail offering must be protected and enhanced to maintain our attractiveness as a retail destination.</p> <p>7.(a) Kilkenny's retail future will hinge on connectivity, public spaces and the concept of a ten-minute walking city to bring visitors to the City centre.</p> <p>7.(b) The core retail map does not indicate the outer 400M isochrone since the last plan and should be included.</p>	<p>of relaxation of Building Control standards for historic properties.</p> <p>4.Delivery of high-quality broadband is seen as a critical piece of infrastructure by the Council. The Draft Plan supports the rollout of such infrastructure and there is particular reference to the National Broadband Plan which is designed to provide for rural areas.</p> <p>5.Provision has been made in the draft plan for the completion of the joint retail strategy within a defined time frame.</p> <p>6.Kilkenny's quality as a retail destination is recognised through the retail strategy and policies contained within the Plan and appendix which is aimed at maintaining the attractiveness of the City as a retail destination.</p> <p>7.(a)This is underpinned by the Movement and Mobility Strategy and the concept of the 10-minute City for visitors and residents alike.</p> <p>7.(b)The 400m isochrone will be mapped.</p> <p>8. This is an operation and budgetaryissue</p>

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		<p>8.Consideration should be given to the appointment of a City Business Liaison Manager with responsibility to co-ordinate the business of the main streets.</p> <p>9.The Chamber of Commerce supports the targeted Technical University of the South East (TUSE) campus and it is imperative it be secured.</p> <p>10.John Street should be added to the list of areas for civic realm upgrades and section S 2.9.19 of the Development Plan should be updated accordingly.</p> <p>11.Four objectives are proposed to ensure the tourism sector's economic recovery over the next 6 years, including:</p> <p>1. Making Kilkenny internationally and nationally recognised, 2. ensuring a coordinated approach to tourism continues and to galvanise the enthusiasm, 3. Supporting strong growth in the tourism sector in Kilkenny and 4. Putting in place a set of metrics that allow for measuring the recovery and ultimate growth of our tourism economy</p> <p>12.Kilkenny is poorly represented as a potential venue for large conferences or entertainment events and the plan should commit to research the viability of such a project and, if viable, the Council should work with stakeholders and get expressions of interest.</p>	<p>9.The TUSE application has been submitted to the Government and it is an objective of the Plan to secure a campus within Kilkenny.</p> <p>10. The ongoing civic realm upgrades are in the context of improving the public realm for vulnerable road users. Should a scheme be devised that allows for such improvements then John Street can be added to this list of public realm improvements. (see submission McDonagh Junction KK-C162-269)</p> <p>11.The Marketing of Kilkenny is coordinated through the Kilkenny.ie website which promotes Kilkenny nationally & intrnationally. The Development is a statement of Policy focussed on spatial distribution of development. The coordinated approach is acknowledged and it is identified as a strategic issue in Section 1.7 Vol 2 to facilitate <i>"the recovery from the impacts of Covid -19 of the Tourism sector in the city and county and further development of the tourism product"</i></p> <p>12.This will be addressed through the Tourism Council/Task Force/LEO There are facilities in the City to cater for conferences and larger events. The Council is continually seeking opportunities to develop and broaden the range of commercial opportunities within the City & County in conjunction with the relevant stakeholders such Failte Ireland,</p>

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		<p>13.The Development Plan should include robust plans to expand the provision of sports and recreation facilities. New facilities in the WE should be made available for use by the wider public outside of school hours and land should be made available for sporting bodies to purchase and develop their own grounds.</p> <p>14.The Northern extension of the Ring Road is completed as soon as possible and should be stated clearly in the plan as an absolute imperative, not just an aspiration.</p>	<p>the Chamber of Commerce and representative bodies from sectors such as hotels, vintners etc. This is an issue more appropriate to the Local Economic and Community Plan which will be prepared this year.</p> <p>13.The Draft Development Plan does make provision for the delivery of recreational and sports facilities within the City in particular in expanding areas of the City. The provision of these facilities is linked to the scale of development.</p> <p>14.The northern ring road extension is not just an aspiration of the Draft Plan. It is a stated objective (12AD in Vol 1) <i>Reserve the proposed line of the proposed Northern Ring road Extension in Kilkenny City and progress it through the planning process.</i> It is identified as Phase 1 of the Western Bypass (Section 5.8.3.3 Vol 2) and objective R1 section 5.8.6.</p>
KK-C162-407	St Lachtains GAA Club	<p>1.The club is not in favour of not having one off housing as many farmers involved with the club and they have sons and daughters, playing both hurling and camogie and will want to build near their farm where they are working. The club is also in favour of houses in villages to keep them vibrant.</p>	<p>1.The Rural Housing Policy supports one off housing for people having a local social or economic need to live in the area. The draft Plan supports the provision of Services Sites for small towns and villages under Objective 18b of the National Planning Framework. In this regard 22 villages, with Social and Engineering Infrastructure have been identified for growth. Within the boundaries of these villages the Rural Housing Policy will not apply.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-408	Kilkenny GAA	<p>1.The aim of the plan in consultation with the Kilkenny GAA Co Board should be to retain, support and grow Kilkenny's long established GAA/parish communities that are the backbone in supporting schools, shops, community centres, their communities and elderly, and to provide opportunities for the new demands for home working and employment within club/parish areas.</p> <p>2.That Kilkenny County Council, Tourism, Board Fáilte and the GAA investigate hurling for UNESCO Heritage status as an opportunity to further develop the worldwide Kilkenny brand.</p> <p>3.That Kilkenny County Council progress the urgent rollout and provision of sufficient and reliable broadband and mobile services in the blackspot areas.</p>	<p>1.The rural Housing Policy supports one off housing for people having a local social or economic need to live in the area. Objective 4J of the draft Plan supports the provision of Services Sites for small towns and villages under Objective 18b of the National Planning Framework. In this regard 22 villages, with Social and Engineering Infrastructure have been identified for growth. Within the boundaries of these villages the Rural Housing Policy will not apply.</p> <p>2. This proposal is outside the remit of the Development plan but can be developed further through the various stakeholders.</p> <p>3.The Council supports and will facilitate the rollout of the National Broadband Plan in accordance with National and Regional Policy. The Council will work towards the remedying of existing deficiencies as part of the NBP.</p>
KK-C162-409	Carlow Kilkenny Labour Party	<p>This is the first ever submission to this process by the group. The following key areas must be addressed:</p> <p>1.Public Housing as a priority - The council should prioritise the building of social housing units, in both urban and rural areas.</p>	<p>1.The Council has prioritised provision of housing both private and public sector through its Draft Development Plan Housing Strategy. A strong programme of public housing is a priority for the Council through its direct housing building</p>

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		<p>2.Public Transport The city bus service must be supported, improved and expanded as the City grows. In rural areas they are calling for a sustainable travel strategy for the county, which would integrate the current Ring a Link, Bus Éireann and private bus services and investigate the use of spare capacity on public services, particularly the school bus service.</p> <p>3.Industrial and commercial development</p> <p>4.Service employment should be complemented by employment opportunities in manufacturing.</p> <p>5.KCC to continue to liaise with Enterprise Ireland to attract manufacturing enterprises to Kilkenny</p> <p>6.They support the creation and expansion of community and social enterprises.</p> <p>7.Opportunities to develop digital hubs and 'hot-desk' type facilities in order to enable more local workers to work remotely in their local areas should be progressed through community and social enterprises.</p> <p>8.Education for the future</p> <p>9.Urgent progression of the Technological University of the South East is required and a call for a substantial campus of the university in Kilkenny city.</p>	<p>programme and schemes which are subject to the National funding.</p> <p>2.The Local Transport Plan will prioritise sustainable transport like walking cycling and City bus services throughout the City. It is an objective of the Draft Plan to implement the Local Transport Plan.</p> <p>3.Employment land locations have been designated throughout the City and County such as Kilkenny City Ferrybank/Belview the District towns of Callan, Castelcomer, Graiguenamanagh and Thomastown along with diversification of the rural economy to support job creation. Kilkenny does through engage with Enterprise Ireland, IDA Ireland in attracting inward investment into the County and also has a strong role to play in SME support and development through the Local Enterprise Office.</p> <p>9.Since the submission was received an application has been made to the Government for the establishment of the Technological University for the Southeast (TUSE). It is an</p>

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		<p>10.Support the Coláiste Pobail Osraí for a comprehensive provision of playing fields and facilities in the planned education campus in the Western Environs of Kilkenny City.</p> <p>11.Cycling and Walking Infrastructure</p> <p>12.Supports the proposals of Kilkenny Cycling Campaign. Encourage park and bike possibilities and substantial outdoor and indoor bike parking areas in the city centre of Kilkenny and in the centres of our county's towns. The aim of the strategy for young people should be to re-establish the rate of 40% of students cycling to post primary schools in Kilkenny city as existed as recently as 1990, according to CSO statistics. Consideration should also be given to developing a cycle route from Kilkenny to Waterford to link into the rapidly expanding and successful Greenway.</p> <p>13.North-South Greenway from Castlecomer to Inistioge should be investigated.</p> <p>Energy production</p> <p>14.Labour Party supports the progression of alternative methods of energy production through solar power, hydro power, anaerobic digestion and wind energy recognise the challenges these may present in sensitive rural environments.</p> <p>15.Valuing our Waterway - We must do all in our power to protect our major waterways, and the network of local</p>	<p>objective of the Draft Plan to establish a campus in Kilkenny as part of the TUSE (Objective 5I page 56).</p> <p>10. Recommendation Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breaghagh valley.</p> <p>11.Sustainable transport is a key deliverable for the City & County. The Local Transport Plan currently under preparation will propose significant walking, cycling and bus transport initiatives for the City. Modal shift targets are also set in the Draft Plan which will be key metrics as to the degree of progress. Sustainable transport actions are also identified for rural areas. (See section 7.9)</p> <p>14.Support for renewable energy is noted. The draft plan supports the National objective through its wind energy, Solar and Bioenergy, Renewable Gas (including anaerobic</p>

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		<p>rivers which flow into them. It is requested that the deterioration of water quality in our rivers noted in recent EPA reports be corrected.</p> <p>16.Equality of access and services - All pathways and access points should be wide and even enough to enable ease of passage for all users of our city, towns and villages in the county.</p> <p>Issues for consideration in local areas</p> <p>17.The renewal of the Kilkenny Street and Barrack Street areas of Castlecomer should be prioritised and a Digital Hub for the town centre along with the Castlecomer Discovery Park and Kilkenny's mining heritage.</p> <p>18.The restoration of parts of Graiguenamanagh town centre must be prioritised. These include the vital old bank and former Anchor hotel sites.</p> <p>19.The issue of broadband provision in Thomastown must be addressed. the construction of a footpath on Mill Street to accommodate the students and staff of Grennan Mill and the public swimming area on the River Nore.</p> <p>20.The Kilkenny Labour Party welcomes the walking trails through the Moat Field and Abbey Meadow in Callan, which have been remarkably successful. We would support the creation of additional walking/heritage trails within</p>	<p>digestion) Energy Recovery from waste and hydro energy policies in the Plan.</p> <p>15.The Draft Plan contains a suit of policies on water quality protection and the Council is committed to implement the measures of the River Basin Management Plan, (see objective 10B Chapter 10 Vol 1)</p> <p>16.All public works projects are designed with Universal Access.</p> <p>17.The District Towns of Callan, Castelcomer, Graiguenamangh and Thomastown all have detailed Local Area Plans in place which deal with the detailed issues raised.</p> <p>19.Broadband is an issue which is not just particular to Thomastown but also to Castlecomer and rural areas of the County in general. There are strong policies supporting the role out of the National Broadband Plan and the role out of private infrastructure subject to the normal planning considerations to location and design.</p>

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		<p>Callan. for a rural tourism development plan to promote the heritage aspects of Callan and Kells to attract more tourism.</p> <p>21.In Kilkenny City, the submission supports contemporary developments as vital in a growing city but having regard to the historical character and scale of the city.</p> <p>22.Seeks the retention of the outdoor dining and meeting area in the Market Yard and the creation of other such areas in the city centre along with pedestrianisation of High Street.</p> <p>23.A regional approach to development of South Kilkenny must continue, including the Metropolitan Area Strategic Plan, cooperation on the North Quay and Belview and on the Greenway projects</p> <p>24.A fifth layer of village recognition should be added to the current development model, recognising vibrant and struggling rural villages not currently included in the Town and Village Renewal Scheme</p>	<p>23.Support for cooperation on the MASP and the North Quays and Belview is noted.</p> <p>24.As part of the revisions to the Core Strategy the settlement hierarchy has been revised to include a more detailed description of the settlements below that of the rural towns and villages (the rural nodes and wider rural area).</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-410	Vincent Comerford	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KK-C162-411	Peter Anthony Smith	<p>1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.</p> <p>2. Additionally, the submission seeks that protected areas, such as those zoned Unsuitable for Wind Energy Development, should be further protected by a buffer zone to prevent wind energy development outside the protected area from adversely affecting the area under protection. The buffer zone should be 10 x the height of a proposed wind turbine, (including the diameter of the turbine blades).</p> <p>3.The intermittent nature of wind generation means that the generation is often less than the stated name plate capacity. The Council, the Government, and all planning authorities must make it a requirement of any company applying for planning permission for any type of energy generator to include the best and worst-case scenarios for efficiency ratings.</p> <p>4. Nuclear power, specifically Small Modular Reactors, would reduce carbon emissions from electricity production close to zero and can back up the unreliable wind and solar already installed. The Council should ask the Government to properly consider nuclear power.</p>	<p>1. See discussion under Section 3.1 Lingaun Valley.</p> <p>2. The Wind Strategy has incorporated the concept of wind energy developments outside protected areas affecting the protected areas, in the sieve mapping analysis as set out in Appendix K. The Strategy has now been altered, see Section 3 Wind Energy Strategy.</p> <p>3. Recommendation: This point is noted, and will be included as DM standard.</p> <p>4. The Council is obliged to have regard to the Government's Energy policy, which at present does not include nuclear power.</p>

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KK-C162-412	Andrew Bowden	<p>1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.</p> <p>2. The flat-topped ridge at Castlebanny would be much more suitable for solar energy.</p>	<p>1. See discussion under Section 3.2 Castlebanny.</p> <p>2. The Draft Plan contains a comprehensive section on Solar Energy in Section 11.8.</p>
KK-C162-413	Spa Development Association	<p>1.Kilkenny County Council should look favourably on some local priority Projects, including projects around the square, providing a rural serviced sites scheme, expansion of playing fields, develop a Healthcare Centre for the area, a working HUB, family resource centre and Government funding Initiatives.</p>	<p>1.With the assistance of Kilkenny County Council, Johnstown is in process of undertaking a Health check which will be followed by the constituting a town team and doing a town plan.</p> <p>Recommendation: Insert the following text: To support the implementation of projects which are included in the approved town plans which have been undertaken by local communities as part of the Kilkenny Town & Village Renewal Scheme Community Health Checks process.</p>
KK-C162-414	Department of Education	See Section 2A above	
KK-C162-415	Wind Energy Ireland	<p>1. This submission relates to the Wind Energy Strategy. This sets out the context for wind energy development in Co. Kilkenny, where there is still potential for further growth and the Kilkenny Wind Energy Strategy (WES) should provide every opportunity to enable projects to contribute to hitting our 2030 targets. WEI believes it is important to consider the views of those living near wind farms, but also of wider Irish society, who favour wind farms.</p>	<p>1. Noted.</p> <p>2. Noted.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>2. The strategic aims of Chapter 2: Climate Change and Chapter 5: Economic Development are supported.</p> <p>3. The strategic aim of Chapter 7 Rural Development is commended, and WEI urge the Council to consider the opportunities existing with the development of renewable energy technologies such as onshore wind in the county.</p> <p>4. WEI commend Kilkenny County Council in consulting the Three Counties Energy Agency (3CEA) in preparation of their renewable energy strategy and commend the Council's Strategic aim in Chapter 11: Renewable Energy Strategy.</p> <p>5. WEI commend Kilkenny County Council on the ambitious target of 100% generation of its electricity needs from renewable sources by 2030 however WEI seek clarification around the proposed target as there is also mention of 70% target.</p> <p>6. WEI asks that the Council account a sufficient area of the county for wind energy development as is appropriate to meet these targets.</p> <p>7. The submission requests that references to the Draft Guidelines on Wind Energy Developments (2019) in relation to noise modelling be removed as this will likely change in the immediate future.</p>	<p>3. This is considered through the Wind Energy Strategy.</p> <p>4. Noted.</p> <p>5. See Section 3.4 Targets.</p> <p>6. See Section 3.4 Targets for a discussion of the capacity of the total area of land designated.</p> <p>7. This refers to the following provision in Section 11.5.3.4: Noise modelling carried out by the applicant in advance of and submitted with the planning application must test and demonstrate compliance with the required noise limits specified in the draft Ministerial guidance." It is appropriate that the Draft Plan refer to any relevant provisions of the Guidelines. References to the Draft Guidelines will be</p>

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		<p>8. WEI ask the Council to also consider Large Scale Wind Energy Developments (>5MW) in areas designated as 'Open to Consideration' as according to Appendix K, these areas have "no significant conflict with environmental designations or sensitivities", and existing or planned electricity grid capacity should not be considered a constraint for the purposes of determining whether areas of County Kilkenny are suitable or unsuitable for wind energy development.</p> <p>9. WEI do not agree that sufficient land area has been provided for as there are many constraints operating to reduce the area available to wind farms, including setback distances from residences, Natura sites, setback from 110kV overhead lines and existing wind farms, and to allow for a natural attrition rate across development sites and projects. More land should be designated to account for the difference between theoretical resource and the actual capacity.</p>	<p>replaced by a reference to the Government's Wind Energy Development Guidelines³⁵, and any revisions thereof". Once the revised Guidelines are adopted, the Council will review its Strategy to ensure compliance.</p> <p>8. A strategic approach has been taken to the identification of areas for large scale wind energy developments, in line with the Guidelines. This has identified the areas of the county most suitable for large scale wind energy developments, based on a number of factors. It is considered prudent to take a strategic approach, and encourage large scale developments into those areas designated as Acceptable in Principle, rather than allowing a widespread dispersal of large scale developments.</p> <p>9. See Section 3.4 Targets for a discussion of the capacity of the total area of land designated.</p> <p>10. As set out in Appendix K, the Wind strategy designations in adjoining counties were considered, and we will continue</p>

³⁵ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

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		<p>10. WEI encourage the Council to engage with the County Councils of Waterford, Laois, Tipperary, Carlow and Wexford to ensure a consistent approach is taken across county boundaries as each Local Authority moves to prepare or review its WES.</p> <p>11. WEI urges Kilkenny County Council not to consider the following potential constraints or facilitators in the process of identifying areas as being potentially suitable for wind energy developments: Grid capacity, wind speed, and nature conservation areas.</p> <p>12. It will be necessary to extend the areas that will be considered suitable for wind farm development into slightly more sensitive landscape areas if we are deliver on the requirements of the Government Climate Action Plan over the coming decade.</p> <p>13. WEI will continue to advocate for the preparation of Regional Renewable Energy Strategies to be accelerated and prioritised by the three Regional Assemblies. Only the Regional Renewable Energy Strategies can ensure that a sufficient quantum of land within each region is identified as having wind energy potential sufficient to meet the national requirements.</p>	<p>to liaise with adjoining counties. Section 4.4.1 <i>Strategy areas of adjoining counties</i> of Appendix K will be updated to reflect any changes since the Draft Plan.</p> <p>11. The formulation of the Wind Energy Strategy followed the methodology as set out in the Guidelines, which includes consideration of Grid capacity, wind speed, and nature conservation areas. See Section 3 Wind Energy Strategy for a discussion of the weightings applied.</p> <p>12. Noted, only those areas deemed highly scenic have been applied as exclusion areas; areas containing features of landscape sensitivity, see Section 3 Wind Energy Strategy, can be included in areas that are Acceptable in Principle.</p> <p>13. Noted.</p>
KK-C162-416	Kilkenny PPN	1. The new City and County Development Plan should use Sustainable Development Goals at the core (17 high-level goals and associated 169 targets agreed in September 2015	1. The City and County Development Plan is made in accordance with current guidance from the Department. The upcoming Climate Action Plan for the County will address the

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
	PPN.	<p>by the members of the UN) and include actions to reach the relevant targets with ongoing monitoring and evaluation of progress in meeting these targets.</p> <p>Housing and Population Growth</p> <p>2.The Kilkenny City and County Development Plan needs to take cognisance of the Duty in its design implementation and monitoring and that the human rights and equality concerns of the communities identified by the Duty (Public Sector Equality and Human Rights Duty ('the Duty').</p> <p>3.The Convention on the Rights of People with Disabilities (UNCPRD) should be embedded into the new City and County Development Plan with clear cross-cutting actions across all sectors which deliver its implementation at a local level.</p> <p>4.Increases in the older age categories, including in the very old' population needs to be factored into the City and County Development Plan.</p> <p>5.The elimination of homelessness is something that needs to be explicitly stated in the City and County Development Plan with associated actions.</p>	<p>goals and targets for sustainable development and the plan will be aligned with the climate Action Plan where required.</p> <p>2.Under the Public Sector Equality and Human Rights Duty or Public Sector Duty, all public bodies in Ireland have responsibility to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users, and everyone affected by their policies and plans. Although not stated in the draft plan, this duty is an obligation which is reflected in the plan in terms of policies to promote equality, social inclusion and universal access.</p> <p>3.The Plan caters for all, regardless of age, ability or disability. The plan has as a cornerstone the requirement for universal design and the Council will ensure that as far as is feasible that areas are accessible to the broadest range of users. To this end all public realm works, public or private will need to comply with Universal Design Principles.</p> <p>4.See above comments regarding Universal Design, which includes provision for all abilities, including age related abilities.</p> <p>5.The Housing Strategy contained in the draft Plan references the Rebuilding Ireland- Action Plan for Housing and Homelessness (2016) which includes various schemes which</p>

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	PPN.	<p>The City and County Development Plan should take into consideration the following:</p> <p>6.Affordability for housing. HAP and RAS threshold should be increased.</p> <p>7.The Development plan has made provision of zoned lands specifically allocated for housing but there is no guarantee that it will be affordable.</p> <p>8.A percentage of zoned land needs to be allocated for single parents</p> <p>9.There is a lack of availability of appropriate accommodation for homeless women and children.</p> <p>10.People living in the rural parts of the county (in a family home) should have the option to vacate their home,</p>	<p>are implemented by the council, including the Social Housing Investment Programme (SHIP), Capital Assistance Scheme and Part V provision.</p> <p>6.The raising of limits for HAP and RAS are matters of national Policy and not matters for review in the Plan.</p> <p>7.Part V and provisions under the Rebuilding Ireland scheme has the intention of making housing affordable but are not matters for review in the plan.</p> <p>8.Zoning lands does not provide housing units and such zoning will not address the needs of individual groupings such as single parents, but an integrated approach providing diversity will address the needs of all sectors of the community.</p> <p>9.The plan and planning guidance which guides the implementation of the plan provide for a mix of house types. The provision for accommodation for homeless persons is a matter for housing policy and can be address through part V and the Council's Capital Investment Scheme.</p>

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	PPN.	<p>downsize to a smaller unit and move closer to nearby services, if possible.</p> <p>11.All housing should be future proofed and capable of easy adaptation for older people or those who acquire illness or disability.</p> <p>12.Prioritise maintenance for older people and disabled people.</p> <p>13.An adequate mixture of houses is required in rural communities where you can walk to the local shops, cafes and avail of local services and facilities.</p> <p>14.No housing developments should be permitted without ensuring adequate access to public transport, safe and attractive cycle and walking paths, schools, sports and community facilities, social and retail outlets.</p> <p>15.Young people should be encouraged to buy and restore existing buildings in our historic towns and villages, there is a need to address the many un-occupied rural houses.</p>	<p>10.Serviced sites are proposed for small towns and villages under Objective 4J as envisaged in Objective 18b of the National Planning Framework. In this regard 22 villages, with Social and Engineering Infrastructure have been identified for growth. These settlements will provide adequate opportunities for downsizing.</p> <p>11.The Council promoted the principles of Universal design and implements the requirements under Part M of the Building Regulations in this regard.</p> <p>12.Housing Maintenance is an operational matter and as such is not reviewed in the plan.</p> <p>13.The focus on settlements and serviced sites under Objective 18b of the NPF aims to address this issue and aims to make rural villages more sustainable and vibrant.</p> <p>14.This requires an integrated approach to Local Area and Master Planning, which requires infrastructure as part and parcel of development. Several Masterplans for housing areas are currently underway in the City, including Loughmacask and the Breaghagh Valley.</p> <p>15. The Council through the operation of the Derelict Sites legislation and through the vacant homes officer seeks to</p>

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	PPN.	<p>16. Portion of the old mart site is still idle and should be developed.</p> <p>17. Kilkenny County Council should purchase land adjacent to some of our smaller villages, put in services and sell the sites.</p> <p>18. A percentage of houses should be put on the plan to accommodate people with disabilities,</p> <p>19. Kilkenny is a very walkable city however once you leave the city centre there are issues for pedestrians such as narrow footpaths.</p> <p>Transport and Mobility: The City and County Development Plan should take into consideration the following-</p> <p>20. There is no bus service from rural towns/villages to City Kilkenny and no cycle infrastructure into Kilkenny</p> <p>21. Easy read timetables with clear communication of routes and bus stops to be made available</p>	<p>identify and release for use properties that are vacant and underutilised.</p> <p>16. The Mart site is private land and the plan requires that, when developed, the Mart site be developed in accordance with an agreed Masterplan.</p> <p>17. The Plan does provide for the development of serviced sites in towns and villages to assist in people securing housing in rural locations. The Plan includes an objective (4J) to develop a programme for 'new homes in small towns and villages' in conjunction with, public infrastructure agencies and objective 4L to prepare design and best practice guidelines for the provision of cluster housing in the rural settlements</p> <p>18. The concept of Universal design is incorporated into the Plan which caters for access for all.</p> <p>19. Traffic management issues in the City will be addressed in the Kilkenny City Local Transport Plan.</p>

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	PPN.	<p>22.The train service in Kilkenny is insufficient to reach a modal shift away from the use of cars.</p> <p>23.Include Universal Design as a core component of Transport and Sustainable Mobility with clear actions</p> <p>24.Access to bikes schemes should be implemented throughout the city.</p> <p>25.The One-way system in City centre has made centre pedestrian friendly but a cycling unfriendly area.</p> <p>26.There are no targets mentioned for increased parking for people with disabilities and there is no mention of the UNCRPD or public sector duty.</p> <p>27.The other issue is that any strategies aimed at age friendly considerations are increasingly being regarded as the same as those required by and for people with disabilities.</p> <p>28.Set out clear targets for shifting the modal share in favour of walking, cycling and public transport</p> <p>29.Undertake a 'safe routes to school' programme of works connecting schools to residential areas.</p> <p>30.A clear and safe interconnecting cycling network is lacking in City Kilkenny.</p>	<p>20.The Council is working with the NTA on the Rural Transport Programme/Local Link projects which will focus on improving bus links throughout the County.</p> <p>21.This is an operational issue for the bus service.</p> <p>22.It is the policy of the Council to support increased frequency of and reduced journey times on all rail service through the County. See section 12.7.2 in this regard.</p> <p>23.Universal design is already a Core component of the Transport Section. See Section 12.10 in this regard.</p> <p>24.A feasibility study on a bike scheme for Kilkenny City has already been completed, which concluded such a scheme is currently not feasible.</p> <p>25.The Kilkenny city Local Transport Plan will consider traffic Management proposals for the City.</p> <p>26.There is a move away from minimum parking standards and it is the intention that public transport will be accessible for people with disabilities.</p> <p>28.Modal shift targets are already included in the plan. See Section 12.1 of volume 1 and Section 5.5 of Volume 2.</p>

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	PPN.	<p>31.More places to rest throughout the city centre with permanent shelter from weather.</p> <p>32.Sheltered spaces and seating needed at bus stops.</p> <p>33.Public engagement workshops to promote understanding of shared public space and better public understanding of unauthorised obstructions to footpaths.</p> <p>Climate Action</p> <p>34.The Development Plan should refer to and make firm commitments to secure the necessary resources to meet obligations of the Climate Action and Low Carbon Development (Amendment) Bill.</p> <p>The City and County Development Plan should take into consideration the following:</p> <p>35.There is a need for more public toilets in the City Centre</p> <p>36.A biodiversity officer should be appointed in a full-time permanent role</p> <p>37.Develop a Climate Action Steering Group</p> <p>38.Focus on development that facilitate Walkable Cities and develop brown field sites to create a more compact city.</p>	<p>29.The Kilkenny City Local Transport Plan will investigate options around the connection of schools with residential areas.</p> <p>30.The Kilkenny City Local Transport Plan will produce both cycling and walking plans for the City.</p> <p>31.This is an operational issue for the Council and the Plan does not preclude such developments.</p> <p>32.The NTA and the council are currently finalising plans for the installation of sheltered bus stops with appropriate seating.</p> <p>33.These are ongoing operational projects that are not issues for the Plan, but may be considered as part of the Kilkenny City local Transport Plan.</p> <p>34.The upcoming Climate Action Plan for the County will address the goals, targets and resources for meeting the requirements of the Bill when enacted. The City and County plan will be aligned with the climate Action Plan where required.</p> <p>35.Noticed.</p> <p>36.This is not a matter for the Plan.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
	PPN.	<p>39.Promote a modal shift by actively promoting sustainable transport options</p> <p>40.Ensure that new developments including housing estates incorporate a sustainable transport modal shift such as including bike parking</p> <p>41.New housing developments should have green infrastructure (parks, biodiversity spaces, protection of older species) planned first.</p> <p>42.The Local Authority should promote good biodiversity practise in construction material.</p> <p>43.There should be a carbon neutral approach to housing.</p> <p>44.Safe routes for wildlife between spaces need to be developed through wildlife corridors, green bridges, underground pipelines, and tunnels.</p> <p>45.The development of demonstration and pilot sites are needed as spaces for education and connection with nature.</p>	<p>37.This is an operational matter and not a matter for the Plan.</p> <p>38.The plan supports compact growth and sustainable transport and the development of brownfields sites is part of the strategy to achieve more sustainable urban forms.</p> <p>39.This is already an objective of the Plan. See Section 12.1 of volume 1 and Section 5.5 of Volume 2.</p> <p>40.Bicycle parking requirements are included in Section 12.5. of the draft Plan and applies to all new developments.</p> <p>41.This requires an integrated approach to Local Area and Master Planning, which requires infrastructure as part and parcel of development. Several Masterplans for housing areas are currently underway in the City, including Loughmacask and the Breaghagh Valley.</p> <p>42.Section 11.12.4 promotes the use of local, low carbon material in the construction of new buildings.</p> <p>43.See Section 11.12.3.3 which supports Near Zero Energy Building (NZEB) standards in accordance with the Building Regulations.</p> <p>44.The Plan includes and objective to continue to identify and map habitats and green infrastructure, but needs additional measures to ensure connectivity.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>Community and Culture</p> <p>The City and County Development Plan should take into consideration the following:</p> <p>46.Ensure that all communities facilities are fully accessible and based on universal design principles and develop a similar Disability-Friendly Programme to the Age Friendly Programme that demonstrates identifiable improvements in the city and suburbs.</p> <p>Social Enterprise</p> <p>The City and County Development Plan should take into consideration the following:</p> <p>47.Provide spaces at affordable rents and rates levels for a range and variety of social enterprises.</p> <p>48.Support and encourage development of social enterprises in rural towns and villages</p> <p>49.Incorporate the development of social enterprise hubs into development</p>	<p>Recommendation: That the objective 9A be expanded to include provision for identifying green corridors, and measures to connect them.</p> <p>45. Biodiversity is encouraged through the plan and through the network of parks and open spaces within the City and the connectivity to educational establishments it is considere there is adequate provision</p> <p>46.The plan requires that all public realm works, public or private will need to comply with Universal Design Principles. Universal design is already embedded in the plan. See sections 12.10 and 13.2.</p> <p>47.This not a dorect DevelopmentPlan issue but the Council will continue to work with local communities to deliver appropriate community facilites locally.</p> <p>49.Multi use enterprise hubs are provided for in the Plan and as part of National Policy.</p>
KK-C162-417	Tullagher Rosbercon GAA Club	1. Any alteration/change to the Rural housing policy as it stands would have significant negative effect on our club and to the parish as a whole and lead to further deterioration to our club playing numbers.	1.Between 2002 and 2016, population growth in the Tullagher Rosbercon area averaged between 16 and 32%, with some proximate rural areas growing by 120%. None of

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		<p>We would ask that Kilkenny County Council:</p> <p>2.Protect of one-off rural housing policies</p> <p>3.Provide serviced sites in our rural parishes to prevent rural depopulation</p> <p>4.Provide an area for expansion of club facilities within the development pan</p>	<p>the Electoral districts in the area showed a population decline over this period.</p> <p>2.The Rural Housing Policy in essence remains true to previous versions in plans adopted since the 2006 Rural Housing Guidelines issued.</p> <p>3.Objective 4 J of the draft Plan supports the provision of Services Sites for small towns and villages under Objective 18b of the National Planning Framework. Rural Nodes in the Tullogher/Rosbercon area are not precluded from appropriately sized housing clusters, provided the rural housing policy can be complied with.</p> <p>4.Although the Plan does not designate lands or precure sites for facilities in smaller towns, section 8.5 includes the policy of the Council to co-operate with local sporting organisations and to enter into joint ventures where appropriate for the provision of such facilities.</p>
KK-C162-418	OPR	See Section 2A above	
KK-C162-419	NTA	See Section 2A above	
KK-C162-420	Michael Cullinane	1.The City is lacking Third Level Facilities.	1.Objective 5I of the plan aims to secure the development of a third and/or fourth level campus(es) in Kilkenny as part of

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		<p>The city would not be able to achieve its full potential unless it:</p> <p>2.Complete the inner relief road– this has become more important due to the relocation of the CBS and the expansion of St. Luke will generate traffic that needs to be catered for.</p> <p>3.Finishes the ring road to the Freshford Road. This project's funding may be out of the council's control but is very necessary</p> <p>4.Find a solution to the "Hazardous Site". an Upper Tier SEVESO site exists in the City boundaries and has not been addressed. Discussion with all parties need to commence for its relocation. Its key location in the Loughmacask Paln area is going to have a direct impact on the proper planning and development of the City</p>	<p>the development of a Technological University for the South East.</p> <p>2.The Inner Relief Road is being reviewed in light of the Loughmacask Masterplan. The Masterplan focus will be in reducing the private car centric dependency of schools.</p> <p>3.The completion of the Kilkenny Ring Road is priority project for the county. Objective 12AD requires the reservation of the proposed line of the Northern Ring Road Extension and progressing it through planning.</p> <p>4.The relocation of the Upper tier Grasslands Fertiliser SEVESO site at Loughmacask is neither an objective of the Plan nor of the Loughmacask Masterplan. The Planning Authority will, in the course of preparing the Loughmacask Masterplan, consult with the Health and Safety Authority on the appropriateness of development proximate to the SEVESO site.</p>
KK-C162-421	Enerco Energy Ltd	1.This submission relates to the Wind Energy Strategy (WES) and welcomes the broad policy support contained within the Draft Plan in relation to the need for additional renewables, as well as the inclusion of objective 11C	1. Noted.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>seeking to meet 100% of electricity needs for Kilkenny to be sourced from renewable resources.</p> <p>2. They state they are concerned that certain provisions within the plan will constrain and limit the ability of the County to achieve its renewable energy goals, and they specifically seek that Large Scale Wind Energy Developments be considered in areas designated as 'Open to Consideration' as these areas have "no significant conflict with environmental designations or sensitivities", and the only difference is that the Acceptable in Principle areas have higher wind speeds. If this is not amended, they seek that Table 11.3 have an additional note/reference added to state: "Should an individual site be capable of demonstrating no significant adverse impacts within an Open for Consideration Area the site will be considered on its own merits in the context of the proper planning and sustainability of the area notwithstanding the proposed installed capacity of the project".</p> <p>3. The submission points out a discrepancy between the content of Table 11.3 of the Draft Plan (https://consult.kilkenny.ie/en/consultation/kilkenny-city-and-county-draft-development-plan-2021-2027/chapter/1152-wind-energy-development-strategy) and that shown in Table 11.3 of the Innovision virtual consultation text</p>	<p>2. A strategic approach has been taken to the identification of areas for large scale wind energy developments, in line with the Guidelines. This has identified the areas of the county most suitable for large scale wind energy developments, based on a number of factors. It is considered prudent to take a strategic approach, and encourage large scale developments into those areas designated as Acceptable in Principle, rather than allowing a widespread dispersal of large scale developments.</p> <p>3. The Innovision website was an additional consultation tool, to encourage further engagement with the Draft Plan. This included a synopsis of each chapter of the Draft, but was not intended as a replacement for the Draft Plan. Unfortunately, there was an error in Table 11.3 of the virtual room, and this has since been rectified, to ensure it reflects the Draft Plan accurately.</p>

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		<p>https://tours.innovision.ie/v/ydjWAg40132.</p> <p>4. The submission includes constraint mapping, which shows that the actual areas of viability for wind energy projects is greatly reduced from the theoretical resource once environmental factors, overhead line set back requirements and setback from residences has been applied. Therefore sufficient wind energy development is critical within Open For Consideration areas and the WES should allow for flexibility, allowing wind energy developments to justify their scales and locations through the EIA and AA processes.</p> <p>5. The description of wind farms in excess of 5MW as "large scale" is an inappropriate description as a single modern on-shore turbine could have an installed capacity of 5MW.</p>	<p>4. See Section 3.4 Targets for a discussion of the capacity of the total area of land designated.</p> <p>5. The categorisation of wind energy developments into various scales is part of the Council's strategic approach, and provides clarity to developers.</p>
KK-C162-422	Catriona Fennelly	1.Request for KCC to consider land/site at Castle Garden, The Demesne, Gowran for inclusion in Gowran settlement boundary.	1.This area is included in the settlement boundary for Gowran Figure 4.11
KK-C162-423	Rosbercon Residents Group	<p>1.Request for a children's playground in the Castlehyde Park Estate development in Rosbercon</p> <p>2.Request for provision of small astro-turf areas</p>	1.The provision of playgrounds/astro turf is compatible with existing Amenity/open space zoning/Recreation zoning. The Council can work with the residents' group to find suitable zoned lands
KK-C162-424	Irish Green Building Council	1.The submission responds to the Draft Plan by including comments on the Draft Plan's ambition regarding decarbonisation and details of suggested actions using the broad lens of decarbonisation of the built environment and	1.The Draft Development Plan has clearly set out a framework for mitigation and adaptation as a response to the recognised Climate Challenge.

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		<p>society. There is concern that the plan does not deliver sufficient action to manage the growth of housing in rural areas given the level of development allowed in existing settlements boundaries.</p> <p>The following should be strengthened in the document:</p> <p>2.Commit to Net Zero for all buildings built by the local authority</p> <p>3.Include a strategy on Whole Life Carbon assessment of buildings.</p> <p>4.Include a new Chapter on Circularity</p> <p>5.The plan should refer to more holistic assessment methodologies on sustainable construction-such as Home Performance Index rather than just the BER, and promote sustainable construction</p> <p>6.Mobility Management does not refer to carbon emissions and this should be required and should also be a key component of Traffic Impact assessment,</p> <p>7.Focus should also be on renovating / making better use of existing buildings,</p>	<p>2.Chapter 2 sets out the overarching framework for climate change and the Renewable energy strategy sets out an ambitious target for renewable energy production within the County.</p> <p>4.Much of the comment relates to standards and targets outside the remit of the Development Plan and are more appropriately dealt with at Regional or National level such a building energy standard and the circular economy.</p> <p>5.Notwithstanding this comment the Draft Plan does contain policies and objectives on building standards, circular economy and embedded energy at an appropriate scale and also references and embeds into the Plan policy initiatives such the local Climate Action Plan and decarbonisation zones.</p>

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		<p>8.Importance to retrofit stock as per targets included in Ireland's Long-Term Renovation Strategy. Retrofitting the existing social housing stock will reduce CO2 emissions and have additional co-benefits –rather than focussing on new build which is the existing policy approach under Chapter 6.4.</p> <p>9.Include more on Green Infrastructure – planting, conversion of gardens to driveways, tree planting, community gardens, ecological networks.</p>	<p>8.The Draft Plan is also compliant with the percentage allocation for development within Kilkenny City & the Waterford MASP areas contrary to that suggested in the submission.</p> <p>Recommendation: No Change</p>
KK-C162-425	Kieran Butler	<p>1.Protection of Ballyragget town water supply</p> <p>2.Construction of surface water pipe work and attenuation tank close to the water source is concerning regarding surface water flow and ground water disruption in a construction setting.</p> <p>3.Maintenance of proposed attenuation in new development would also be concern as they are often forgotten about</p> <p>4.Main concern is permanent damage to an already aging water infrastructure that is prone to contamination in flood events. Flood water enters the treatment plant contaminating the water supply.</p>	<p>1. The protection of the Water supply for Ballyragget is an issue which is ultimately the responsibility of Irish Water.</p> <p>2. Water sources for water supply have source protection areas assigned to them. Proposed developments are assessed to determine any potential impacts.</p> <p>3.Maintenance is required by planning condition is housing developments and once taken in charge this then becomes the responsibility of the Council under its annual maintenance programme</p> <p>4.This is assessed at planning application stage and ultimately is a matter for Irish Water.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KKC162-426	Brian Hennessy	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-427	Kathleen Duffy	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1. See discussion under Section 3.1 Lingaun Valley.
KKC162-428	Ballyragget Development Association	<p>1.N77 Road from Hennebry Cross to Ballyragget needs to be upgraded, with particular issues to be resolved around businesses in Ballyragget.</p> <p>2.Senior National School requires traffic calming/safety measures. Poor visibility approaching from Castlecomer</p> <p>3.Dereliction of prominent buildings needs to be address to preserve unique character of the Square and adjoining streets</p> <p>4.Request to monitor on a regular basis the 5 railway and river bridges for traffic impact</p> <p>5.Request for preservation of the old Petrol pumps in the square</p> <p>6.Request to repair boundary wall of Donoughmore Graveyard</p> <p>7.The increased population will require additional infrastructure such as creche, preschool and additional National school places.</p> <p>8.Existing medical care building is not fit for purpose</p>	<p>Ballyragget is one of 22 settlements identified in the Core Strategy as having a settlement boundary within which the Council will support economic development, services, town renewal and serviced sites. Section 4.6 sets out the approach that will be followed for these settlements. Ballyragget already had a health check done under the town and village renewal scheme. Kilkenny County Council and LEADER are currently in discussions with various Ballyragget community groups to, under the Town & Village Renewal Scheme, put Ballyragget forward for the next round of Community Health Checks and to establish a town team and undertake a town plan. The detailed town specific issues raised in the submission are not issues to be addressed at County Plan level, but should form part of the town plan and will form part of a package of issues that the Council will generally assist with and help with applying for funding for.</p> <p>Recommendation: Include the following Objective 4M in Chapter 4 <i>"To support the recommendations of the town plans compiled under the Town and Village Renewal Scheme subject</i></p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		<p>9.Explore provision of a board walk along the River Nore from Ballyragget N77 Bridge to Durrow to link with the Durrow Loop Walk</p> <p>10.New timber and wire fencing along the roadside verges is taking away hedges and therefore removing natural wildlife habitat</p>	<i>compliance with the provisions of the Habitats and Birds Directives and subject to the availability of funding."</i>
KKC162-429	Ballyragget Historical Society	<p>1.Request to repair boundary wall of Donoughmore Graveyard</p> <p>2.Dereliction needs to be addressed, particularly around the square and as regards several prominent buildings in town</p>	<p>1 The detailed issue raised in connection with the graveyard is not issues to be addressed as part of County Development Plan level.</p> <p>2. The Council utilises its powers under the Derelict Sites Act and where properties are found to be derelict the Council does take appropriate action to resolve the dereliction.</p>
KKC162-430	Noreen Harty	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KKC162-431	G. Sarah Power	1.This submission relates to the Wind Energy Strategy and objects to the change in designation for the lands in their area (Corbally, Garryduff, Mullinabeg and Harristown). See discussion under Section 3.3 Templeorum.	1.See discussion under Section 3.3 Templeorum.
KKC162-432	Alana Power	1.This submission relates to the Wind Energy Strategy and objects to the change in designation for the lands in their area (Corbally, Garryduff, Mullinabeg and Harristown). See discussion under Section 3.3 Templeorum.	1.See discussion under Section 3.3 Templeorum.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KKC162-433	Geraldine Power	1.This submission relates to the Wind Energy Strategy and objects to the change in designation for the lands in their area (Corbally, Garryduff, Mullinabeg and Harristown). See discussion under Section 3.3 Templeorum.	1.See discussion under Section 3.3 Templeorum.
KKC162-434	Freshford.ie	<p>1.Submission relates to lands subject to Mr. Tallis' submission below and supports the proposal for the following reasons:</p> <p>2.It would allow for the Development of the Millenium Park to extent onto Mr. Tallis' lands</p> <p>3.The banks of the Nuenna river is rich in diversity and could be used for education purposes.</p> <p>4.The proposal could lead to improved access to the R693 to the park. An alternative access is essential.</p> <p>5.The lands closer to the village might be made available for community use.</p>	<p>Development opportunity in Freshford is severely constrained by reasons of flood risk. Mr. Tallis' lands are part of a limited extent of lands in Freshford that falls outside the 1/1000 years flood zone. The lands are relatively centrally located and close enough to Bohercrussia Rd and the Square to be suitable for serviced sites. As indicated that lands could connect to Bohercrussia Rd.</p> <p>Recommendation: It is recommended that the red line be extended to include lands identified under KKC-162 -435with an objective on the lands to provide access via the Bohercrussia rd.</p>
KKC162-435	Patrick Tallis	1.The submission proposes inclusion of lands to the West of the Millenium Park in Freshford. Which would facilitate the extension of millennium park into the lands, provide safer access to Millenium Park, will allow for undevelopable lands to the East to be made available for community use, and will allow for high quality, low density housing, which would be in demand.	<p>1.See submission ref. KKC162-434 above.</p> <p>Recommendation: The land be included provided that access is provided to the Bohercrussia Road.</p>
KK-C162-436	James O'Byrne and Bridget O'Byrne	1.This submission relates to the Wind Energy Strategy and objects to the change in designation for the lands in their area of Templeorum including Garryduff Wood, Mullinabeg	1.See discussion under Section 3.3 Templeorum.

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		Wood and Corbally Wood. See discussion under Section 3.3 Templeorum. 2.The submission recommends that Kilkenny should concentrate on planting more trees.	2.Policies in relation to Tree planting as part of developments are set out in Section 9.2.5 Woodland, Trees and Hedgerows. The Parks section of the Council also regularly undertakes tree planting as opportunities permit.
KK-C162-437	Bridget Finnerty	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-438	Olivia Downes	Rath Ullard	See submission ref. KK-C162-60
KKC162-439	Newpark Residents Association	1.The Residents association would like to express interest in the Newpark Primary Care Centre due to having no premises for training, Bingo, coffee mornings, supporting vulnerable residents etc. 2.Would like the relevant information and application form.	1. The use of the buildings is a matter for the HSE and building operators. This is not a matter directly related to the Draft City and County Plan. 2.As part of this CE's report it is proposed to zone the building area of the Primary Care Unit for neighbourhood uses which will facilitate the uses proposed (see KKC162-124) Recommendation: No Change
KKC162-440	Brenda Jackson	1.This submission relates to the Wind Energy Strategy and objects to any proposal for wind farms in an area considered of natural beauty on a number of grounds including effects on wildlife, residents and visual impact. The area to which the submission refers is not specified, however this is from a resident of Piltown.	1.A number of changes are now proposed to the Wind Energy strategy, see Section 3.1 Lingaun Valley, and also Section 3 Wind Energy strategy.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KKC162-441	Adam Cullen	1.This submission relates to the Wind Energy Strategy and objects to the building of a windfarm near Castlegannon, which is near Castlebanny, see Castlebanny Section 3.2.	1.See discussion under Section 3.2 Castlebanny.
KKC162-442	Mountain Grove Loop Walk Committee	1.This submission relates to the Wind Energy Strategy and objects to the change in designation for the lands in their area of South Kilkenny including Garryduff Wood, Mullinbeg Wood, Templeorum and Corbally Wood as these areas were previously designated as Unsuitable. See discussion under Section 3.3 Templeorum.	1.See discussion under Section 3.3 Templeorum.
KKC162-443	Liam, Ronan and Mary Ryan	1.This submission relates to the Wind Energy Strategy and objects to the change in designation for the lands in their area of South Kilkenny including Garryduff Wood, Mullinbeg Wood, Templeorum and Corbally Wood as these areas were previously designated as Unsuitable. See discussion under Section 3.3 Templeorum.	1.See discussion under Section 3.3 Templeorum.
KKC162-444	Eileen Curtis, Kilkenny and Carlow Education and Training Board	Request No. 1: Provision of suitable sport pitches 1.KCETB will provide a significant number of sporting and recreational facilities in the new schools campus. Dept. of Education will not be providing sport pitches in the Western Environs. The provision of full-sized multi-use playing pitches, as part of recreation and amenity infrastructure, is very important for wellbeing, quality of life and identity in the new community in the Western Environs. A full-sized multi-use grass or synthetic based playing pitch would be 90 metres * 145 metres in size, and allow schools and	1.The KCETB request for playing pitches close to the proposed schools campus is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breagagh Valley. These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the

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		<p>sporting clubs play official competitive matches. A sustainable level of sporting infrastructure can be provided in the Western Environs through the auspices of KCETB schools, Kilkenny County Council and other stakeholders.</p> <p>Request No. 2: The playing pitches to be located adjacent to the three new schools</p> <p>2.KCETB requests that such facilities be provided adjacent to the three schools to enhance the health and safety of the student body of children and young adults aged 5-19.</p> <p>Request No. 3 The provision of safe walking and cycling infrastructure</p> <p>3.KCETB requests that a network of segregated cycle tracks, i.e. a web of interconnected cycle routes that are physically separated from motor traffic by kerbs, bollards or other appropriate structures be created for the Western Environs.</p> <p>4.KCETB will over the coming three years enhance their further education and training facilities, the siting of which is key. Proposals have been made to SOLAS and the Council will be kept updated.</p> <p>5.The further Development of the School Campus in the WE The Development of a Flagship Education and Training College</p> <p>6.The provision of apprenticeships and other services to part time and marginalised learners.</p>	<p>establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p> <p>Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breagagh valley.</p> <p>2.In accordance with the Breagagh Valley Plan, the pitches can be located close to the school but as per the plan will not be directly adjacent.</p> <p>3.The masterplanning for the Breagagh Valley has provided for sustainable modes of transport throughout the neighbourhood.</p> <p>4.Noticed</p> <p>5. Noted.</p> <p>6. Noted and welcomed</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KKC162-445	Shane Phelan	<p>1.Submission objects to proposed zoning of lands as Urban Agriculture where other lands are "Agriculture" or "Strategic Reserve", as</p> <ul style="list-style-type: none"> • Mr. Mulhall cannot be prevented from building a house for him or his family on such zoning and refers to "Flanders Case". Submission refers to Vacant Site Register and entry onto same as "illegal". • "Strategic Reserve" is basically the same zoning and Mr. Phelan will not be accepting any zoning other than Strategic Reserve. • "Urban Agriculture serves no Strategic Purpose for the Development plan. • Land currently a garden is also Urban Agriculture, why? As it has never been part of farm and was previously zoned Urban Agriculture • Previous reports for VSL state nobody live on site, but many families live there with many more to come. 	<p>1.The critical difference with the Urban Agricultural zoning is the fact that the two portions of land affected are within the exiting built up fabric of the city (along the Kells Road and along the New Orchard Road).</p> <p>Lands zoned strategic reserve are on the periphery of the built-up area.</p> <p>Lands zoned agriculture are located outside the built-up area outside of any LAP Masterplan or Action Area Plan</p> <p>In both cases where Urban Agriculture has been proposed the areas were subject to previous Action Plans (Smithlands Action Area Plan and Newpark Action Area Plan) and lands were developed for housing in these areas.</p> <p>A stronger protection is required to ensure that development potential of the lands is protected given their location.</p> <p>There are no restrictions on agricultural practices within that zoning recognising that the lands are currently in agricultural use.</p> <p>In both cases the lands were removed from the vacant sites register.</p> <p>Recommendation: No change</p>
KK-C162-446	Paddy O'Keefe	<p>1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.</p>	<p>1.See discussion under Section 3.2 Castlebanny.</p>

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-447	Molly O'Keefe	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1.See discussion under Section 3.2 Castlebanny.
KK-C162-448	Robert Duggan G	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.
KK-C162-449	Freebooters AFC	<p>1.Freebooters are interested in and would like to play a role in proposed Sporting and Recreational section for the WE and would like to develop partnerships with the three schools.</p> <p>2.Freebooters AFC request that the plan allocate playing pitches and that they are future proofed and allow adequate space for grass and synthetic pitches.</p>	<p>The Club's request for access to playing pitches in the Breaghagh Valley, formerly referred to as the Western Environs, is noted. An extensive area has been earmarked for future Amenity/Open Space and Recreational use within the Breaghagh Valley.</p> <p>These Amenity lands will be extensive enough to accommodate playing pitches and although they are proposed central to future Residential parcels of land, these will be rolled out in tandem with the housing delivery. It is recommended that an objective be included for the establishment of full-sized playing pitches as part of the future laying out of the Amenity lands.</p> <p>Recommendation: Include in Section 2.2.3 of the Plan a statement of policy to require the layout of full-sized multi-sport playing pitches on the Amenity Lands in the Breaghagh valley.</p>
KK-C162-450	Michael Cody	1.This submission relates to the Wind Energy Strategy and welcomes the fact that lands at Ballywairy, Glenmore are designated as 'Acceptable in Principle'. This area is suitable	1.Noted. It is proposed to retain this area's designation as Acceptable in Principle.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		for wind energy development for a number of reasons including: <ul style="list-style-type: none"> • General Environmental and Planning Suitability • Planning Precedent • Available Grid Capacity 	
KK-C162-451	Jim Aylward	1.This submission relates to the Wind Energy Strategy and welcomes the fact that lands at Ballyfacey, Mullinavat, are designated as 'Acceptable in Principle'. This area is suitable for wind energy development for a number of reasons including: <ul style="list-style-type: none"> • General Environmental and Planning Suitability • Planning Precedent • Available Grid Capacity 	1.Noted. It is proposed to retain this area's designation as Acceptable in Principle.
KK-C162-452	Edward Fennelly	This submission relates to the Wind Energy Strategy and objects to the designation of "Acceptable in Principle" for the area of Oldtown, Tullaroan for the following reasons: 1.There are a number of windfarms already operating in the area and there will be cumulative noise and visual impacts which would be detrimental,	1.The Wind Energy Strategy sets out the strategic guidance on the areas within which wind energy developments may be considered. Vol. 1, Chapter 11 includes the considerations which the Planning Authority will take into account in the assessment of any application. This includes a Landscape and Visual impact assessment.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		2.This would cause a risk of collision with aircraft near Kilkenny Airport.	2.Section 11.5.3.10 Interference with Communication Systems, requires that applicants for wind farms make contact with the Irish Aviation Authority in advance of any proposed application. The IAA promotes and regulates the safety of aviation in Ireland.
KK-C162-453	Rory and Mary Dicker	1.This submission relates to the Wind Energy Strategy and objects to the designation of "Acceptable in Principle" for their area of Ballygowan, Piltown, near Corbally Wood. They consider the area is unsuitable as their dwelling is within 500m of the track under the existing masts in Corbally. See discussion under Section 3.3 Templeorum.	1.See discussion under Section 3.3 Templeorum.
KK-C162-454	John & Philomena Knox	1.This submission relates to the Wind Energy Strategy and objects to the designation of "Acceptable in Principle" for land in their area of Templeorum. See discussion under Section 3.3 Templeorum.	1.See discussion under Section 3.3 Templeorum.
KK-C162-455	Amanda Gannon	1.This submission relates to the Wind Energy Strategy and objects to the designation of "Acceptable in Principle" for land in their area of Templeorum. See discussion under Section 3.3 Templeorum.	1.See discussion under Section 3.3 Templeorum.
KK-C162-456	Melissa Norris	1.This submission relates to the Wind Energy Strategy and expresses concern about the selection of a location for turbines– in the middle of the South Leinster way on route to the Blue way and the proposed Greenway extension from	1.See discussion under Section 3.2 Castlebanny.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
		Waterford to New Ross. See discussion under Section 3.2 Castlebanny.	
KK-C162-457	Templeorum Environmental Group	1.This submission relates to the Wind Energy Strategy, see discussion under Section 3.3 Templeorum.	1.See discussion under Section 3.3 Templeorum.
KK-C162-458	Jim Brogan on behalf of Mary & Jacinta Fitzgerald	<p>1.Zoning change is sought for lands within the Draft development Plan boundary from Agriculture (Strategic reserve) to Existing residential as:</p> <ul style="list-style-type: none"> • It is located within the 2016 CSO boundary • Development Plan Strategy based on concept of the 10-minute City • The site meets that criterion • Access and services provided under 16/59 • The site meets the sequential approach to zoning. 	<p>1.Notwithstanding the location of the site within the CSO boundary the lands should not be treated in isolation. The site is located within a block of land bounded by the Ring road, the permission was granted under 18/593, the road objective R4, (new road link from the Callan Road to the Waterford Road roundabout) the Seville Lodge lands and other agricultural lands all of which together require masterplanning to achieve a range of suitable uses and appropriate connections to and from and within the area. In this context a change to Existing Residential would be inappropriate.</p> <p>Two large areas have been identified for significant residential development over the period of the Plan namely the continuation of lands along the Breagagh Valley and the Loughmacask Masterplan area.</p> <p>The proposed site is considered premature at this time.</p> <p>Recommendation: No Change</p>
KK-C162-459	Various, see Appendix A of this report.	1.This submission relates to the Wind Energy Strategy and the area known as the Lingaun Valley; see discussion under Section 3.1 Lingaun Valley.	1.See discussion under Section 3.1 Lingaun Valley.

Sub. No.	From	Summary of Issues	Chief Executive's Opinion & Recommendation
KK-C162-460	John Spain Associates on behalf of Cairn Homes	1.The submission seeks the transfer of 1.8ha site of residential zoning to another location within the landholding in lieu a site which has been granted outline permission for a primary school. The school site to be zoned community facilities.	1. Recommendation: Add residential zoning as requested. Change school site from residential to community facilities.
KK-C162-461	Maureen Cotterell	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-462	Stephanie Kenny	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.
KK-C162-463	Lynda Cotterell	1.This submission relates to the Wind Energy Strategy and the area known as Castlebanny. See discussion under Section 3.2 Castlebanny.	1. See discussion under Section 3.2 Castlebanny.

3 Wind energy strategy

3.1 Lingaun Valley

The following submissions raise concerns about the impact of wind energy developments on the Lingaun Valley area, which is located in the southwest of the county, along the border with Co. Tipperary.

Some of these submissions refer to the Kilkenny hills, overlooking Killamery, Windgap, Lamogue, Kilmoganny, Hugginstown, Templeorum and Owing. The area known as the Lingaun Valley is addressed here. The hills overlooking Templeorum, and the hills north as far as Hugginstown are addressed in Section 3.3 Templeorum.

Submissions ref. KKC162-

7, 9, 10, 11, 12, 13, 14, 15, 16, 21, 22, 24, 26, 28, 31, 33, 34, 36, 37, 38, 39, 40, 41, 44, 47, 50, 55, 62, 68, 69, 79, 80, 81, 83, 84, 90, 91, 95, 96, 110, 118, 121, 127, 159, 160, 174, 178, 206, 208, 210, 212, 215, 216, 220, 228, 246, 270, 274, 275, 285, 306, 310, 311, 340, 357, 358, 360, 364, 379, 401, 410, 411, 426, 427, 430, 437, 448, 459.

The concerns raised are summarised under a number of headings as follows:

Government policy on Wind Energy/statutory context

- The current Wind Energy Guidelines are out of date and updated national wind energy Guidelines are due to be finalised shortly, therefore this Strategy is premature. The Council is basing their Wind Energy Development Strategy on Draft Guidelines, that they cannot depend upon coming into force. The Council should suspend the acceptance of planning applications for wind power generation developments and all areas currently zoned 'Unsuitable for Wind Energy Development' must remain protected.
- Government policy is moving away from onshore wind energy with the focus now shifting to offshore wind and tidal energy.
- Turbines should be located off shore as the haphazard approach to siting commercial wind energy and solar energy developments onshore makes Eirgrid's work of running the national grid even more challenging and expensive. The Council should use every opportunity to pressure the Government to only allow offshore wind energy developments.
- Wind energy is intermittent and is a variable and unstable way to produce electricity, and adding more wind power only adds to the difficulty of a stable supply. The economic cost of infrastructure for wind energy outweighs its benefits due to the intermittent nature of the resource.
- The subsidisation of wind energy is a waste of public funds.

General issues/Overview of this area

- The designation of the Lingaun River Valley as a Priority Archaeological Landscape in the Draft Plan is welcomed, however to protect this archaeological landscape it is essential that the hills and the area within it are designated unsuitable for turbines as this offers more robust protection.
- The 2014 Development Plan included this area as not suitable for wind farms and no rationale has been provided as to why that changed.

- The definition of areas identified as being ‘open for consideration’ should be clarified to ensure that the protected views, heritage sites and sensitive landscapes of the Lingaun Valley are fully addressed in the Development Plan policy.
- There is no reference to a proper Strategic Environmental Assessment.
- There are perceived inconsistencies in the policy approach to the Lingaun Valley between the submission made by Kilkenny County Council to the Pre-Draft stage of the Tipperary County Development Plan and the policy outlined in the Draft Kilkenny Plan.
- A number of wind turbine developments were proposed for the Tipperary side of the valley and these were refused planning permission by Tipperary County Council and by An Bord Pleanála. These show that this area is not suitable for wind turbines; it should therefore be zoned as unsuitable in its entirety for turbines to avoid the constant stress and financial cost on the community who seem to be in a constant battle to protect the area and its historic sites.
- If this area is open for consideration, some developments may be proposed as Strategic Infrastructure Development, applying straight to An Bord Pleanála, who may not have regard to the sensitivities of an area such as this, and without giving credence to local knowledge, expertise and opinion.
- There has been insufficient time for public consultation due to the Covid pandemic and no notice was given to directly affected landowners and homeowners.
- There is uncertain compliance with the Aarhus Convention and EU law.

Heritage

- The view and line of sight of monuments in the Lingaun Valley is historically significant - the ancient megalithic monuments were all deliberately constructed within view of each other and are aligned to Slievenamon and to the other high points in the area like that of Corraighist, Corbally and Owing Hill. Turbines would negatively affect these relationships.
- Wind energy developments would have a negative impact on the setting of Knockroe Passage Tomb (also known as The Caiseal) and other historical sites in the Lingaun Valley. The Knockroe tomb is the only passage tomb in Europe, with alignments both with morning and evening sun. The sun rises over Kilmacoliver/Owing/Garryduff hills and sets on the foothills of Carrigadoon in Co. Tipperary. If the ‘Acceptable in Principle’ area close to Tullahought and Owing had wind turbines they would certainly be seen from Knockroe to the East and South East coming close to the point of the rising sun.
- The OPW Conservation Plan for the Knockroe Passage Tomb states that *“there is potential for developments remote from the site to affect the preservation of its significance in an adverse manner. Developments that would interfere with the visual connection with Baunfree and SliabhnamBan fall into this category”*.
- Knockroe is unusual as it is in a valley and you are looking up at the skyline to the east, south and west. This means that any developments along the ridges would have a much more detrimental effect on the visual landscape compared to being on the top of a hill looking down, as is the case with Newgrange.
- Wind energy developments would negatively impact the scenic aspect of the area and its natural beauty, on the setting of Tullahought village and recent tourism projects, and heritage in the Lingaun Valley.
- The catchment area of the upper Lingaun is an elevated oval-shaped valley running east from Slievenamon and surrounded by a chain of hills. It has its own name in Irish – Sliabh Díle, and this is an extremely significant rural area historically, and may yet offer significant revelations.

- There is a natural enclosure created by Slievenamon and its foothills to the north to Nine Mile House and to the south over Faugheen and in Kilkenny from Nine Mile House via Windgap, Brown Mountain, Owing and Baunfree. These hills are currently zoned unsuitable for turbines in both counties and this must continue to be the case, furthermore the area enclosed inside these hills should also be protected. These ancient boundaries should override more recent, county boundaries.
- This landscape is relatively small-scale due to spatial enclosure provided by hills and a wind energy development could not respond sensitively to this intimacy.
- Two of the largest Hill-forts in Ireland are situated on the summits of Carrigadoon Hill and Curraghadobbin Hill and there are many more archaeological features dotted around the hills.
- The landscape around the High Crosses of Kilkieran and Killamery in County Kilkenny and Ahenny in County Tipperary also require protection, as set out in the *Conservation Plan for the Western Ossory High Crosses*. The location of these should be included with the circle of hills and the enclosed valley in an area zoned unsuitable for turbines.
- The Ormond and Victoria Slate Quarries which straddle the Lingaun River (Tipperary/Kilkenny border) are also tourist attractions in their own right. The setting of the slate quarries would be adversely affected by large scale wind energy developments.
- This area along the Lingaun River is also a Special Area of Conservation and is home to peregrine falcons, ravens, barn owls, buzzards and species of bat. Turbines are detrimental to bird and bat populations.
- Wind energy developments may negatively impact on the Ogham Stones in Lamogue Churchyard and the Grotto Walk in Windgap village.
- Wind energy developments may negatively impact the setting of Leac Na Scail Dolmen in Harristown (see Section 3.3 Templeorum) and Owing Portal Tomb and Carrigmoclear Hill in Co. Tipperary.
- The setting of the villages of Ahenny and Ninemilehouse, as designated Architectural Conservation Areas in Tipperary's Development Plan, should be protected from wind energy developments.
- The woodlands in this area, especially those with remaining pockets of broadleaf trees such as Garryduff (See Section 3.3 Templeorum), Mountain Grove and Glenbower, alongside the existing upland scrub and non-intensive and generally sympathetic farming practices make for significant wildlife corridors and should not only be protected but should be developed further.
- Any wind farm here would interfere with Protected View No.18, View west into Co. Tipperary on Kilmacoliver/Scough Road No. LS5097.

Health/Environmental concerns

- Turbines can have detrimental effects such as being noisy (noise pollution) and obtrusive.
- Turbines cause shadow flicker.
- Turbines have health risks especially to those vulnerable such as those with mental health issues, and on children with special needs, such as autism or ADHD.
- Turbines produce harmful Infrasound.
- Impact on animals who may be sensitive to the infrasound.
- The local road network is unsuitable for the construction traffic associated with large scale turbines and such traffic would cause safety concerns.
- The water table may be reduced during the construction of any turbines.

- Landslides are a risk associated with large scale wind energy developments in upland areas, including on Corbally and Corraightrist.
- There may be water run-off which could cause flooding on the road network.
- The pouring of concrete for wind farms may cause flooding in lower lying areas.
- No risk assessment to homes has been carried out.

Socio-economic Impacts

- The Lingaun Valley Tourism Group are working to develop a tourism package around the many historical sites along the Lingaun Valley as part of Ireland's Ancient East brand.
- Tullahought Village have developed many tourism projects recently including a hilltop viewing tower and tourist information point on the Owinging approach road with spectacular views with information on the historical sites and culture of the surrounding area, a walking route from the village through the local countryside to the summit of Baunfree Hill which provides splendid views of counties Tipperary, Kilkenny, Waterford, Carlow and Laois and a wildlife lake and nature reserve, sited on the Carrick approach road which has a magnificent view across the Lingaun Valley to Slievenamon. The efforts of the Tullahought community to improve and enhance the village for locals and tourists should be encouraged by the Council, providing protection for the landscape, views and historic sites.
- Windgap Village is not a location where you would expect wind turbines to be permitted.
- There are several important equine operations in this area both in horse training and breeding which bring much needed employment to the area. It has been established that thoroughbred horses are not compatible with wind turbines.
- Any turbines will have a negative effect on property values.

3.1.1.1 Chief Executive's Response

These submissions relate to the Wind Energy Development Strategy as contained in Vol. 1 Chapter 11, Renewable Energy and Appendix K. The Draft Development Plan 2021 has included specific protection for the Lingaun Valley for the first time; see Section 9.3.1.1 Archaeological landscapes, and objectives 9D and 9E.

The submission made by Kilkenny County Council to the Tipperary Development Plan highlighted the importance of the Lingaun Valley, which is followed through in the Draft Plan, with specific protection for the Lingaun Valley for the first time.

Some of the Lingaun River Valley area was included in the 'Open for Consideration' wind strategy policy area in the Draft Plan, within which no Large Scale wind farm would be permitted. An area further east was designated as Acceptable in Principle. The submissions raise significant concerns about the impacts of any wind energy development, either small or large scale, on the rich archaeological heritage of the area. In order to ensure the visual relationships between Knockroe, Baunfree and Slievenamon are protected, it is considered appropriate to change the designation of this area to Not Normally Permissible.

In relation to specific health and environmental concerns, the Draft Plan sets out a Wind Energy Strategy that is in line with the Government's *Wind Energy Development Guidelines*³⁶. Every

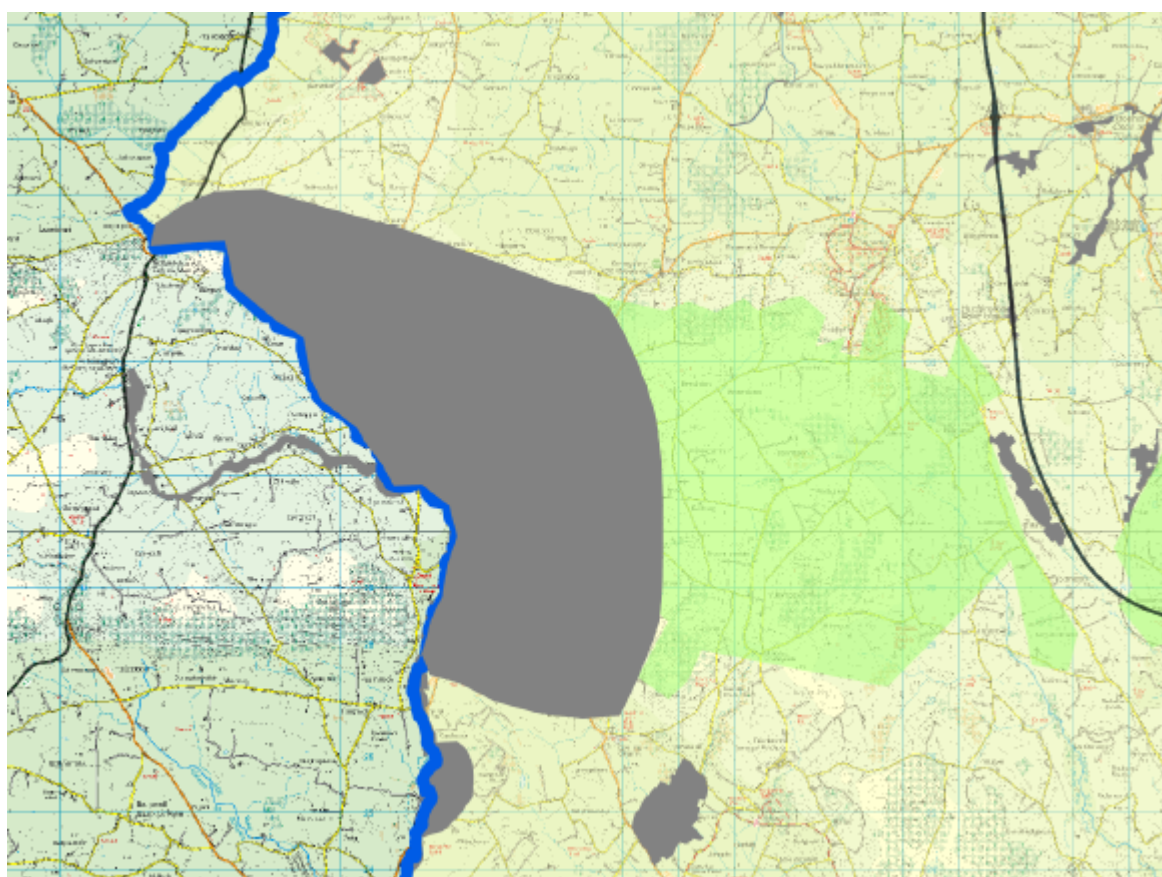
³⁶ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

application for a wind energy development is assessed against the relevant development management standards in relation to its impacts, including impacts on adjoining properties. Environmental considerations of a wind energy development include the consideration of landslides, and as set out in the *Wind Energy Development Guidelines*³⁷, a landslide and slope stability risk assessment must be submitted for the site for all stages of the project, with proposed mitigation measures where appropriate.

The policy context for wind energy developments in Ireland is set out in the 2006 *Wind Energy Development Guidelines* which were added to by the *Interim Guidelines on Statutory Plans, Renewable Energy and Climate Change* (2017) and subsequently by the *Draft Revised Wind Energy Development Guidelines*. As set out in Appendix K, the Draft Wind Energy strategy is fully compliant with all the relevant Guidelines. Once the revised Guidelines are adopted, the Council will review its Strategy to ensure compliance.

Conclusion

Given the potential impacts on the setting of the archaeological sites in the Lingaun Valley, it is now proposed to designate the Lingaun Valley within Co. Kilkenny, including a large area east and west of Knockroe, as 'Not Normally permissible' for the purposes of the Wind Strategy, see Map.



³⁷ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

Recommendation:

Change the Wind Strategy map, to designate area around Lingaun River Valley as 'Not Normally permissible'.

3.2 Castlebanny

The following submissions raise concerns about the impact of wind energy developments in the Castlebanny area, which is located in the south of the county. At present, there is a current application for a Strategic Infrastructure Development (SID) with An Bord Pleanála (their reference 309306) for 21 turbines and ancillary works, by Springfield Renewables Limited, in Castlebanny. Many of the submissions relate directly to this SID application.

Submissions ref. C162-

42, 43, 54, 59, 99, 101, 104, 107, 109, 111, 114, 120, 122, 123, 125, 126, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 147, 149, 150, 152, 154, 155, 158, 166, 170, 171, 175, 180, 182, 183, 185, 186, 189, 190, 191, 192, 195, 196, 199, 200, 202, 204, 205, 207, 208, 210, 214, 217, 221, 224, 225, 229, 233, 235, 237, 240, 242, 250, 255, 256, 258, 260, 271, 276, 277, 280, 283, 284, 285, 286, 288, 292, 294, 297, 309, 323, 324, 329, 347, 351, 361, 389, 402, 412, 441, 446, 447, 456, 461, 462, 463.

The concerns raised are summarised as follows:

Government policy on Wind Energy/statutory context

- The current *Wind Energy Guidelines* are out of date and updated national wind energy Guidelines are due to be finalised shortly, therefore this Strategy is premature.
- Government policy is moving away from onshore wind energy with the focus now shifting to offshore wind and tidal energy.
- The national grid cannot store the electricity already being created in this country.
- There seems to be no coordination or joined up thinking between the relevant parties even as to whether there will be a market for all this energy as most countries in Europe are developing their own green energy strategies.
- The electricity produced from such an industrial sized wind farm such as the one proposed would be exported via the Celtic Interconnector to France, at the expense of the beauty of the Irish countryside and tourist industry.

General issues/Overview of this area

- Lands that are the subject of the wind farm proposal should retain their current designation and not be redesignated as "Acceptable in Principle" for wind farm development.
- There has been insufficient discussion about the changes to the Wind Energy Strategy, and due to Covid-19 residents have not been able to gather to discuss the matter. As a result, many people are ignorant as to the scale and magnitude of this proposed development.
- The submission period for the Development Plan should be extended for the period of COVID-19 lockdowns as there is no opportunity for people outside the 5km limit of Kilkenny city to go into the Council to view the Development Plan without internet access.
- There are 21 turbines proposed, of a height of 185 metres for Derrylackey, Castlebanny and surrounding areas, which are industrial sized turbines and should be placed offshore. (Townlands include Castlecoster, Derrynahinch, Kiltorcan, Coolroe Beg, Baunskeha, Castlebanny, Kilvinoge, Cappagh, Coolnahau, Ballytarsna, Mullennakill, Glenpipe, Ballymartin, Ballyvatheen, Ballynoony West, Derrylackey, Garrandarragh, Ballyegan and Ballyvool). The scale and height of these turbines is unsuitable for this area.

- The new designation for this area of Acceptable in Principle will mean reduced due diligence and oversight by the Planning Authorities when assessing applications for large-scale wind farms by developers.
- Area is home to over 1,200 residents, all of whom would be impacted by this proposal.
- The area already has contributed to the green energy revolution with four solar farms approved and traditional energy with a high-pressure gas line passing by.
- Solar energy should be considered in place of wind energy; this is the preferred sustainable energy solution for South County Kilkenny.
- The amount of CO² produced by this development will be very high and will carry over for generations.

Visual impacts

- Turbines will be the biggest onshore turbines in Ireland & even the UK.
- Turbines would be an eye sore and negatively impact the rural landscape, and the natural and cultural heritage resource. They would have an effect on the South Leinster Way and the picturesque Arrigle Valley and the views that the Castlebanny, Mullinakill and Cappagh area have to offer. The countryside of Castlebanny is unspoiled, and overlooks the Arrigle Valley, Ballyhale, Inistioge, Mullinavat and Thomastown.
- The scale of the turbines will make landscape assimilation impossible.
- Lights on the top of the turbines will be intrusive at night.
- The proposed greenway is going to be far from an inviting leisure destination if its backdrop is an industrial windfarm.

Setback

- The distance of wind turbines from residents (setback distances) should be increased to at least 2km and there should be a height limit on the turbines. Some submissions cite the Westmeath Development Plan and the Wind Turbine Regulation Bill 2020, in the Dáil currently.

Socio-economic Impacts

- Turbines will have an effect on a large rural population and this wind farm may cause depopulation.
- This development would negatively impact on house prices in the area (up to 30/40%) and on the ability of people to obtain mortgages.
- There will be negative effects on tourism businesses in the area.
- Electromagnetic interference - will there be disruption to phones/TV/internet coverage.
- There will be impacts on the South Leinster Way, which is a major source of tourism in the area.

Health/Environmental concerns

- Impacts include turbine infrasound and low frequency noise which cause sleep disturbance and migraines. People who are on the autistic spectrum are more susceptible to the mechanical noise and infrasound associated with wind turbines.
- Turbines have health implications connected with them e.g. epilepsy.

- Noise will be an issue as Guidelines and recommendations for noise monitoring are not sufficient and ineffective, and national noise monitoring for developments does not address the reality.
- Dust pollution will be an issue; dust from the quarrying has health impacts, and it will not be possible to prevent dust dispersal during quarrying activities on a hillside known for its high winds and dry conditions. The national standard Bergerhoff Dust Monitoring device does not monitor small respirable particles which are seriously damaging to lung health. Until such time that real time, continuous air quality monitoring is actually legislated/regulated and is mandatory for all dust generating developments, communities will not be protected.
- The proposed windfarm development is 2.8 km from Ballyhale Pre-School and National School.
- There is a significant danger to the integrity of the well water of the households surrounding the proposed development as these are drawn from an aquifer, which is supplied by local streams. These streams face re-routing, pollution, and destruction which will cause indefinite damage. In addition, the capacity of the water table is likely to be reduced during construction due to the extensive blasting and borrow pits, and there is also likely to be a detrimental effect on groundwater quality, which may cause ecological damage. The water supply in the area (mainly via private wells) needs to be properly assessed by a reputable independent consultancy.
- If there are effects on water, how will an alternative supply be sourced.
- Surface run off of water from the large areas of hardcore needed for the development will affect the local lands, private wells and water courses.
- Blasting will generate silica which has negative health implications.
- Blasting could also damage home foundations.
- There could be damage to the gas line running nearby.
- The area the subject of the proposed development is upper bogland and may be at risk of landslide due to this development. The Little Arrigle river flows down from Castlebanny hill which forms a natural artery for a bogslide.
- Construction traffic will pose a hazard due to the large size of the turbines being transported.
- There may be increased risk of lightning strike and fire risk in a forested area.
- Reports of collapsing turbines & falling parts/blades – may impact visitors to the South Leinster Way Walking Trail.
- Locals' enjoyment of the scenic walks such as through Derrylackey woodland and the South Leinster way will be impacted.

Heritage impacts

- The area in which the development is proposed is home to a wide spectrum of biodiversity including bats, red squirrels, pine martens, hares, foxes, deer, pygmy shrews, frogs, toads, lizards, owls, buzzards, kestrels, cuckoos, numerous butterflies and many native species of wild flowers and plants. All these species would have their habitats irretrievably damaged and may suffer health effects.
- Underground cabling will damage habitats and geological features.
- There are possible impacts on the River Nore (SPA) and the River Arrigle (SAC). The River Arrigle SAC was selected to protect the Freshwater Salmon and Otter under Annex II of the terrestrial and coastal & inland species and the River Nore SPA was selected for the protection of the Kingfisher under Annex I of the EU Birds directive. In a recent planning application in

this area a quarry was declined permission as the Council stated that a quarry would pose an unacceptable risk to protection of the Natura 2000 network.

- Impacts on biodiversity are very expensive to remediate afterwards.
- The area is one of the few untouched areas where we can see succession in habitats and look at changes over the years.
- There will be impacts on Derrylackey Woodland and the South Leinster Way.
- There is a stand of broadleaved woodland and a group of five very mature trees approaching veteran status on the site proposed for the wind farm. They comprised two beech, two ash and one sessile oak ranging from 15-20 m in height.
- There are sites of historical importance on or around the area for development, notably St. Molin's Well, St Molin's Cave, Woodstock estate and Jerpoint Abbey and there will be impacts on tourism businesses. St. Molin's Cave is located in close proximity to the proposed wind farm and borrow pit.
- There is a particular concentration of megalithic structures such as ringforts, standing stones, Fulacht Fiadh and Megalithic tombs in the surrounding landscape of Castlebanny, and two monastic structures (St. Molin's Well and St Molin's Cave) that hold international significance.
- There will be a large and permanent loss of lands used for forestry (clear felling of 205 acres of established forest).
- As a result of the planned planting of trees and the return of some of the land to a fallow state, a herd of wild deer has re-established itself on Castlebanny hill over the last 10 to 15 years, and the construction of the wind farm will put this herd at risk.
- A large part of Castlebanny hill is a natural bogland which has existed for thousands of years, the proposed windfarm will cause irreparable damage to the boglands.
- There is a particular concentration of prominent thoroughbred stud farms and equine facilities in South Kilkenny with four listed on the Stallion Trail, one of which is placed within 2km of Castlebanny.

Strategic Infrastructure Development - application process

- The current wind farm proposal sidesteps the Council's current Wind Energy Strategy designation in the 2014 Plan of 'Open for Consideration' with its limit on the size of development proposal that would be considered.
- Concerned parties were denied the right to make submissions in relation to this planning application at local level and have to submit directly to An Bord Pleanála instead.
- The accompanying Environmental Impact Assessment Report submitted by the developers for this wind farm is not sufficiently robust or technically detailed to enable an informed decision by Planning Authorities.
- Impacts of the construction phase of the development have not been properly addressed in the EIAR as the three year construction period will involve 12 hour days of quarrying, blasting and crushing of rock, heavy mechanical activity and haulage, delivery of tonnes of aggregate and concrete, building of a substation, contractor's compounds and facilities, delivery and erection of 21 turbines (185m high with 155m blades) and underground cabling.
- There has been a lack of direct up-to-date information and real evidence regarding health issues.
- There has been no meaningful consultation with members of the public or local residents by the developers. The public consultation period will start and end during a Level 5 lockdown.

- There have been no open public meetings, online or offline, only people within 2km of the turbines were informed. Although the plans are available for inspection at Thomastown planning office, the office is officially closed because of Covid 19 and consequently, citizens are not able to inspect these plans freely and at their convenience and instead, have to make an appointment to do so.
- Application documents include images of what the windfarm would like from great distance but fails to show the detrimental impact they will have on those who will be living directly under these monoliths.

3.2.1.1 *Chief Executive's Response*

These submissions relate both to the Castlebanny SID application and to the Wind Energy Development Strategy as contained in Vol. 1 Chapter 11, Renewable Energy and Appendix K. The SID application is outside the scope of this document, however the Council made a comprehensive submission to the SID process. This submission is available on our website under Strategic Infrastructure Development.

The consultation phase of the Draft Development Plan was comprehensive, as detailed in **Section A** above. A total of 463 submissions were received. During the Level 5 restrictions, it was also possible to make an appointment to view planning applications or the Draft Plan at the Planning office. In addition to all the material being available freely online, the Draft Plan was available for purchase from the Planning office and a number of copies were posted to customers. The timeframe for public display of the Draft is set out by legislation, and this was adhered to.

Outdated Guidelines

There are numerous references to the Guidelines being out of date. This is a reference to the Wind Energy Development Guidelines (2006), which were added to by the Interim Guidelines on Statutory Plans, Renewable Energy and Climate Change (2017) and subsequently by the Draft Revised Wind Energy Development Guidelines. As set out in Appendix K, the Draft Wind Energy strategy is fully compliant with all the relevant Guidelines. Once the revised Guidelines are adopted, the Council will review its Strategy to ensure compliance.

Setback distances

The Draft Plan sets out a Wind Energy Strategy that is in line with Government policy as set out in the *Wind Energy Development Guidelines*, including on setback and height. Every application for a wind energy development is assessed against the relevant development management standards in relation to its impacts, including impacts on adjoining properties. The Wind Turbine Regulation Bill 2020 is currently making its way through the Dáil, and this proposes new set back distances³⁸. If this is enacted, and/or the revised Guidelines are adopted, the Council will review its Strategy to ensure compliance. Some submissions also make reference to the setback distances included in the Draft Westmeath Development Plan 2021-2027. These were reviewed by the Office of the Planning Regulator in its submission to the Draft Westmeath Plan (dated 30th June 2020), and the OPR recommended the Council to remove those setbacks, as they contradicted Government policy. As Westmeath County Council did not comply, and published Material Amendments which continued to contravene

³⁸ Section 6(3) Wind turbines that are of a height which is greater than 25 metres shall be located not less than a distance of ten times the height of the turbine away from any dwelling.

Government policy, as of April 29th the Minister served a Notice of Intention to issue a Direction relating to this provision.

Health/Environmental concerns

In relation to specific health and environmental concerns, the Draft Plan sets out a Wind Energy Strategy that is in line with Government policy as set out in the *Wind Energy Development Guidelines*³⁹. Every application for a wind energy development is assessed against the relevant development management standards in relation to its impacts, including impacts on adjoining properties. Environmental considerations of a wind energy development include the consideration of landslides, and as set out in the *Wind Energy Development Guidelines*⁴⁰, a landslide and slope stability risk assessment must be submitted for the site for all stages of the project, with proposed mitigation measures where appropriate.

Heritage concerns

Various features of environmental sensitivity have been highlighted in many of the submissions to the Draft Plan.

In addition to the broad landscape patterns and designations as outlined in Section 9.2.12 of the Draft Plan, at a more specific level, the mapping of Landscape Sensitivity Factors provides guidance for use in project design and development management. These factors can be used by all parties to establish that development proposals address the issues that are likely to give rise to the biggest effects. In some areas, where sensitivity arises because of altitude or steepness, a closer focus on features will reveal that the most sensitive area may be the environs of a prominent ridge line, or visibility from a main settlement. The highest landscape sensitivity arises from a combination of three factors – Elevated steep-sided ridgelines, Slopes in excess of 10% and altitudes in excess of 200m. These features will be mapped on Figure 9.3 Landscape Sensitivities in Chapter 9 Heritage, and some of these occur in the Castlebanny area (Slopes >10%). The mapping of the sensitivity of these areas and features should not be viewed as a prohibition on development, however the visual impact of any large scale wind energy development in proximity to these features of sensitivity needs to be addressed in a Landscape Impact Assessment report (as set out in Appendix 3 of the Draft Wind Energy Development Guidelines). As set out in the Guidelines, such a report should include mitigation measures to ensure that the proposal represents the least impactful option within a given area.

Figure 9.3 Landscape Sensitivities in Chapter 9 Heritage will be amended to show features of environmental sensitivity such as Elevated Steep-sided Ridge-lines, Slopes in excess of 10% and altitudes in excess of 200m. Section 11.5.3 Impact on the Landscape will be amended to refer to this.

Conclusion

This area is suited for wind energy development, however recognition must be given to the presence of sensitive landscape features, by identifying them on Figure 9.3 Landscape Sensitivities in Chapter 9 Heritage, and including reference to them in Section 11.5.3.3 Impact on the Landscape.

Recommendation:

³⁹ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

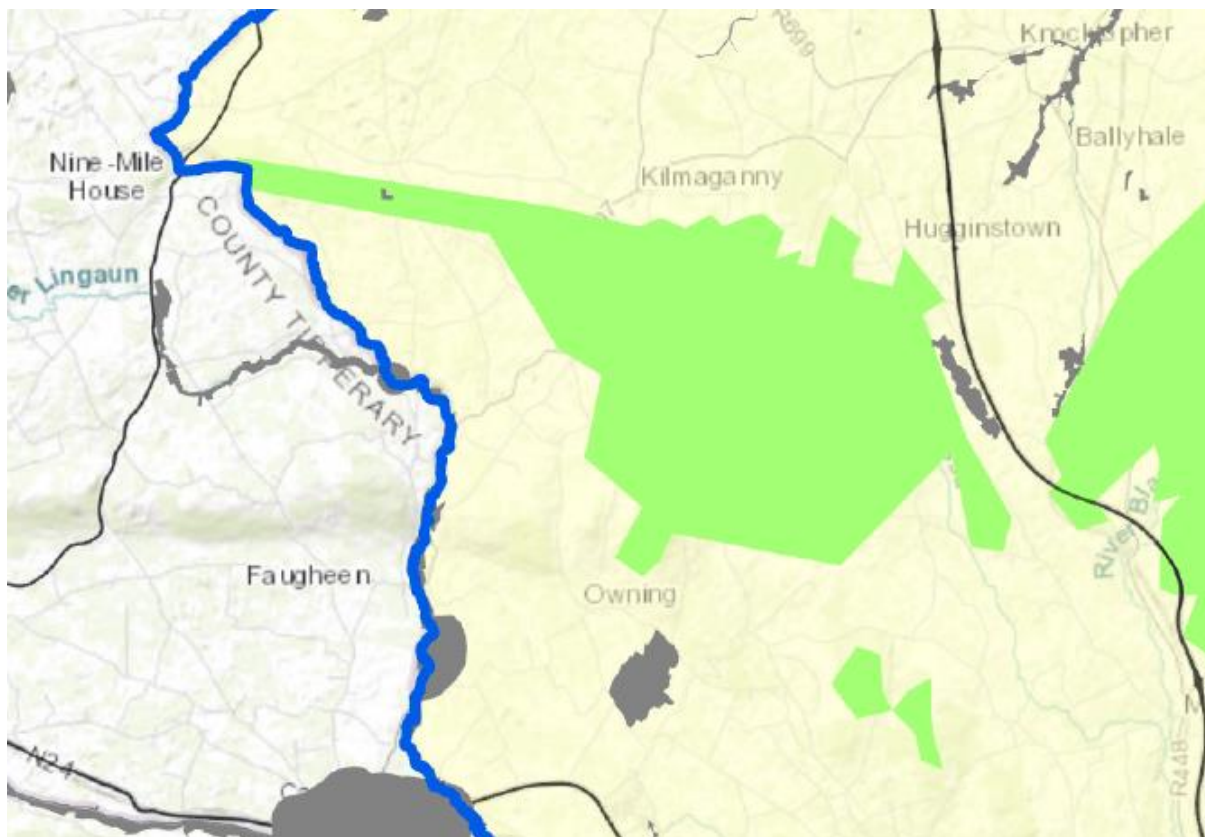
⁴⁰ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

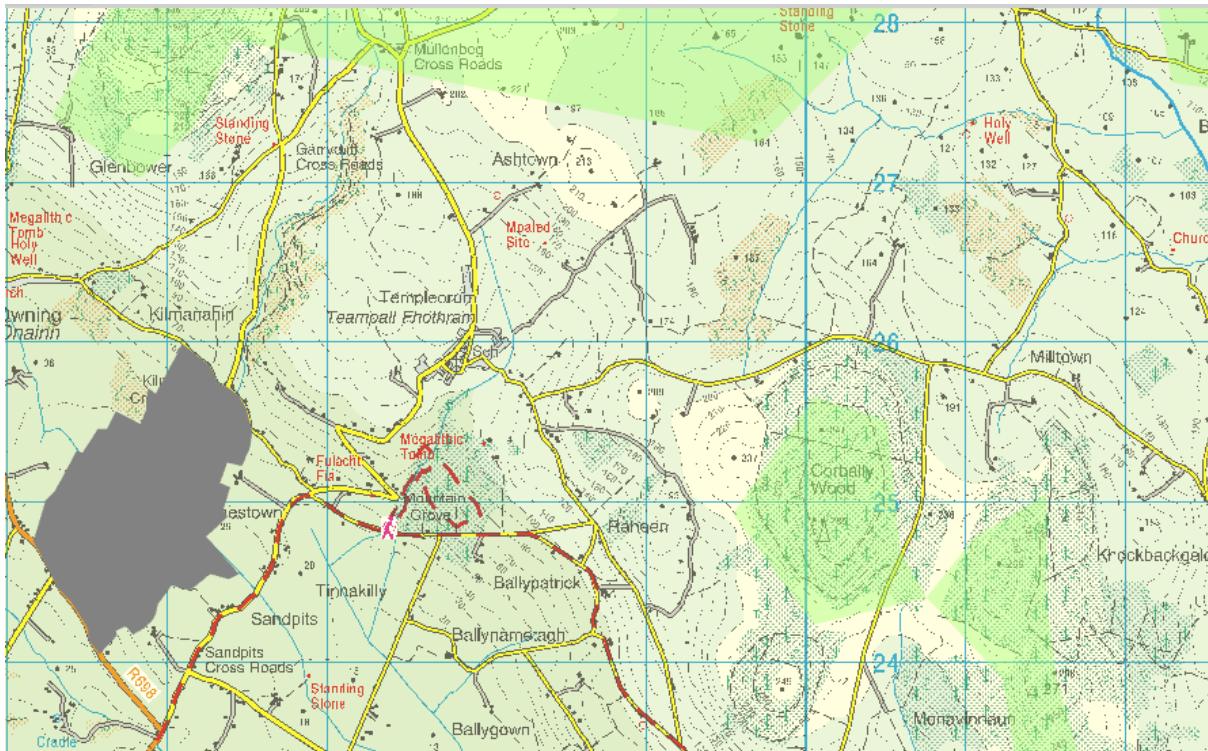
Identify environmentally sensitive features on Figure 9.3 Landscape Sensitivities in Chapter 9 Heritage and include reference to them in Section 11.5.3.3 Impact on the Landscape.

Retain the area at Castlebanny as an area for Acceptable in Principle in the wind energy strategy

3.3 Hills north and east of Templeorum

The following submissions raise concerns about the impact of wind energy developments on the area surrounding Templeorum, which is located in the southwest of the county, see map below. This area includes Garryduff Wood, Mullinbeg Wood and Corbally Wood. The area to the west has been addressed in Section 3.1 Lingaun Valley. Under the Wind Energy Strategy, an area has been designated as Acceptable in Principle, stretching from Templeorum in the south to Hugginstown and Kilmaganny in the north.





Submissions ref. C162-

197, 217, 266, 279, 298, 303, 337, 340, 362, 385, 388, 431, 432, 433, 436, 442, 443, 453, 454, 455, 457.

The concerns raised are summarised under a number of headings as follows:

Government policy on Wind Energy/statutory context

- Government policy is moving away from onshore wind energy with the focus now shifting to offshore wind and tidal energy. Wind energy developments should be located in off shore locations, as they do in Britain, and there are suggestions as to the approach the Government could take to advancing off shore projects. Wind and sea energy (off shore) would give the maximum return on investment whilst protecting the natural environment.
- Current Wind Energy Guidelines are out of date and updated national wind energy Guidelines are due to be finalised shortly, therefore this Strategy is premature.

General issues/Overview of this area

- These areas were previously designated as Unsuitable, and the environmental impact has not been assessed.
- The change in designation would give the green light to construction without a proper consultative process.
- The Covid Level 5 restrictions lockdown is not an ideal time for decision making, as the community cannot meet to discuss.
- The residents did not receive any direct postal communication.
- The change in afforestation to wind farms is not in line with the Government's Green agenda.
- The carbon footprint arising from wind farms is very large.

Health/Environmental concerns

- Turbines can have detrimental effects such as being noisy (noise pollution) and obtrusive, and have an impact on quality of life.
- Turbines cause shadow flicker.
- Turbines have health risks especially to those vulnerable such as those with mental health issues, and on children with special needs, such as autism or ADHD. Some children are particularly susceptible to flickering lights and low frequency noises.
- Health effects of turbines can include ringing in ears, headaches, lack of concentration, vertigo and sleep disruption.
- Turbines are detrimental to bird and bat populations.
- There are masts already in Corbally Wood, turbines would add to the negative effects.
- Local road network is unsuitable for the construction traffic associated with large scale turbines and such traffic would cause safety concerns, including for cyclists.
- There may be impact on animals including horses.
- The water table may be reduced during the construction of any turbines and water supply may be affected. Has an assessment been done on the effects on the water table.
- Danger of landslides/subsidence, including on Corbally and Corraigthrist.
- There may be water run off which could cause flooding on the road network.

Heritage impacts

- There would be a negative visual impact on the landscape, and on the setting of the South Leinster Way which runs through this area.
- Wind energy developments would negatively impact on the Loop Walk in Mountain Grove, which is home to a rare purple orchid.
- There will be impacts on forestry and biodiversity in Corbally Wood and Garryduff Wood. The area is home to pine martens, hen harriers, owls, buzzards, kestrels, cuckoo, sparrowhawks, red deer and bats.
- Negative effects on birds, especially during the construction phase.
- Impact on heritage sites such as Harristown Dolmen (Leac na Scail).

Socio-economic Impacts

- The output of the telecommunications masts in Corbally wood may be affected by any turbines.
- This development would negatively impact on house prices in the area.
- There will be negative effects on tourism businesses in the area.
- There will be impacts on equine operations in this area.

3.3.1.1 Chief Executive's Response

This area can be broken into two components; the smaller parcels designated as Acceptable in Principle around Corbally Wood (approx. 180 hectares), and the larger part stretching to the north as far as Hugginstown. This second parcel constitutes a large parcel of land of over 3,000 hectares, which has the potential to contribute significantly to the Council's Renewable Energy targets.

The consultation phase of the Draft Development Plan was comprehensive, as detailed in Section A above.

In relation to specific health and environmental concerns, the Draft Plan sets out a Wind Energy Strategy that is in line with Government policy as set out in the *Wind Energy Development Guidelines*⁴¹. Every application for a wind energy development is assessed against the relevant development management standards in relation to its impacts, including impacts on adjoining properties. Environmental considerations of a wind energy development include the consideration of landslides, and as set out in the *Wind Energy Development Guidelines*⁴², a landslide and slope stability risk assessment must be submitted for the site for all stages of the project, with proposed mitigation measures where appropriate.

The policy context for wind energy developments in Ireland is set out in the 2006 *Wind Energy Development Guidelines* which were added to by the *Interim Guidelines on Statutory Plans, Renewable Energy and Climate Change* (2017) and subsequently by the *Draft Revised Wind Energy Development Guidelines*. As set out in Appendix K, the Draft Wind Energy strategy is fully compliant with all the relevant Guidelines. Once the revised Guidelines are adopted, the Council will review its Strategy to ensure compliance.

Conclusion

In general this area is suited for wind energy development, however the small size of the area designated as Acceptable in Principle around Corbally Wood renders it unsuitable for large scale wind energy developments, therefore this area will be redesignated as Open for Consideration.

Recommendation:

Change designation of area around Corbally Wood from Acceptable in Principle to Open for Consideration. Also, cross reference with Section 3.1 Lingaun Valley to see proposed changes to the western portion of this area.

3.4 Targets – change to Section 11.5.1 Current Status and Targets

The following submissions raise concerns about the Renewable Energy targets as outlined in Section 11.5.1 Current Status and Targets of the Draft.

Submissions ref. C162-

47, 314, 370, 391, 394, 415, 421

They seek clarity around the Council's renewable energy targets, and also, contend that more land (headroom) should be designated to account for the difference between the theoretical wind resource and the actual capacity.

3.4.1.1 Chief Executive's Response

The Council's goal, as set out in the Draft Plan, is to enable Kilkenny to generate the equivalent of 100% of its electricity needs from renewable sources by 2030. Renewable sources include all sources, including wind, solar and bio energy.

⁴¹ Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

⁴² Government of Ireland, Draft Revised Wind Energy Development Guidelines, 2019

The Council's Wind Energy strategy aims to ensure that the county provides sufficient capacity to provide a pro-rata share of wind generation capacity, while also making provision for the other types of energy that will be required when weather-dependent sources are unavailable.

Section 11.4 Kilkenny Targets set out that 3CEA estimated that by 2030, Kilkenny will use 633 Gigawatt hours (Gwh) of electricity. If this was solely to be met by wind energy, 3CEA have estimated that an additional 178 MW of wind energy are required, which can be translated into 42 number of 4.2MW turbines. This is the absolute maximum wind energy contribution required to meet the 100% renewable energy target, as the intermittent nature of wind energy dictates that it would be impossible for wind energy to be the sole energy source.

A typical wind turbine requires a land take of 0.4 hectares, however this refers to the constructed hardstand, not including wind take. On the basis of the figures as set out in some submissions, an area of 85 ha is needed for a wind farm of 20 MW. The revised Strategy designates over 50,000 hectares as Acceptable in Principle. Notwithstanding the constraints imposed due to set backs topography design this is considered a sufficient area to deliver level of renewable energy through wind generation.

Conclusion

The Council is satisfied that the Wind Strategy provides sufficient land to meet its stated renewable energy commitments.

Recommendation:

Amend Strategic Aim to 100% in Chapter 11 Renewable Energy and update Section 11.4 Kilkenny Targets and 11.5.1 Current Status and Targets to clarify the target and how it will be achieved.

4 Matters arising

4.1 Structure of Plan

Some submissions raised queries around whether particular statements were objectives or policy. It is important to reiterate, as set out in Section 1.5 *Structure of the Plan* that the entire Plan is a statement of Council policy. Each chapter contains objectives and also has Development Management Requirements in relation to specific areas and topics. Objectives are, as far as possible, **Specific, Measurable, Achievable, Relevant and Time bound (SMART)**.

4.2 Written Statement

Chapter 4 Core Strategy

4.4 District Towns

Include objective that all Local area plans will be reviewed within 6 months to comply with the County Development Plan as per OPR's recommendation.

Objective:

"To review the Local Area Plans for Callan, Castlecomer, Graiguenamanagh and Thomastown to ensure compliance with core strategy of the Plan within 6 months of the coming into effect of this Plan."

Section 4.5 New Ross Environs

Make following changes:

Change heading to Rosbercon

Add Rosbercon to Table 4.4

Figure 4.26 Include Rosbercon in map title

4.8 Development Management Requirements

Last line of paragraph 3

"No one proposal for residential development should however increase the existing housing stock by more than ~~12.5%~~ *10—12 units* within the lifetime of the Plan".

Chapter 6 Housing and Community

Section 6.6

Insert the following objective 6L(a)

"To prepare design and best practice guidelines for the provision of cluster housing in the rural settlements and rural nodes of the County.provide serviced sites where appropriate for future residential development where resources permit". (ref Objective 4L)

Chapter 7 Rural Development

Section 7.6 Fishing

Include *Snap net fishing* in the first sentence of Section 7.6. as follows:

In particular *snap net fishing* is a long tradition on the River Suir.

Section 7.8 Rural Housing Policies

At the end of first paragraph insert:

“The Council will ensure that the provision of one-off houses in rural areas does not undermine the vibrancy and vitality of the town or settlements in rural areas while accommodating the disperse rural living traditions of the rural areas of County Kilkenny.”

Delete the following from page 94.

- Loss of agricultural land

Chapter 8 Open Space and Recreation

New section 8.2.1.4 Ferrybank Linear Parks

Include new section here based on text in the LAP.

Section 8.7

At the end of the last paragraph in Section 8.7 add the following:

“It is an objective of the Council to provide a playground at Rosbercon”

Chapter 9 Heritage and Culture

9.3.1.4 Industrial Heritage

At the end of the last paragraph insert the following sentence

“The Council will seek funding to progress the preparation of an inventory of lime kilns in the county”

Chapter 12 Movement and Mobility

12.11.3 Access to National Roads

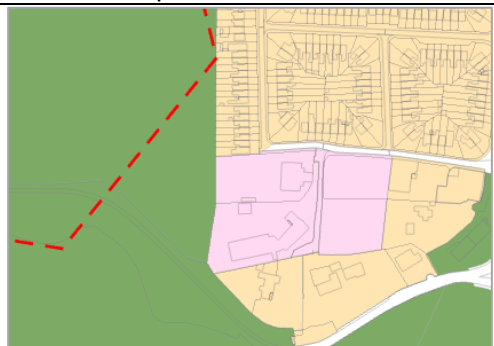
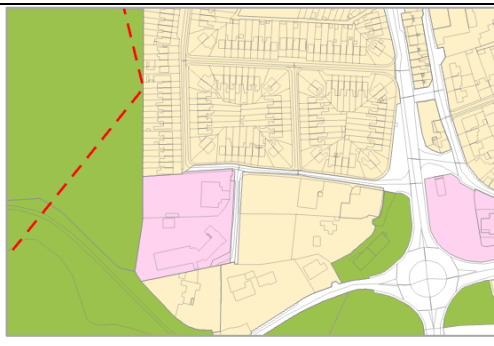
Insert the following after “It is the intention of the Planning Authority to develop and agree a policy for access off the national roads in conjunction with the TII”

- **Dunmore civic amenity site on the N77** (See also submission ref. KK-C162-27)

Kilkenny City Zoning Map.

Area on St. Josephs Road at the Butts:

Change zoning from Community Facilities to Existing Residential

Zoning as presented in Kilkenny City & County Draft Development Plan	Proposed change to landuse zoning map
	

4.3 Appendices

Appendix B Housing Strategy

Include the following wording in the Housing Strategy:

“The Council fully supports measures aimed at assisting older people to live in their own home with dignity and independence, for as long as possible. In the context of an increasing ageing population there is also a pressing need to facilitate a significant increase in housing output specifically aimed at older people.

Our ageing population represents a challenge from a housing policy perspective, with the number of people over the age of 65 years expected to reach 1.4 million by 2040, or about 23% of the total population.

As a general rule, new housing for older people or step-down housing should be located in close proximity to existing facilities and amenities, to enable people to continue to interact with their local communities and enjoy a high quality of life.

In line with the Government policy “Housing Options for our Ageing Population” the County & City Development Plan should include the following policy objectives to support the concept of independent living and assisted living for older people, to support the provision of specific purpose built accommodation, to explore new housing delivery models including those with associated care and supports, and to promote the opportunity for older people to avail of the option of downsizing if desired.

It is council policy to

- Embed ageing in place options for older people into the planning system.*
- Drawing on the Housing Need and Demand Assessments, develop demographic reporting tools and population projections to gain a better national understanding of the needs and location of housing options for older people in the County and City Development Plan.*
- Increase the provision of smaller homes in developments, ensuring that older people can remain living in their communities, close to essential services and facilities.*
- Work with Approved Housing Bodies, co-operatives, private developers, and Age Friendly Ireland on the development/redevelopment of older-person housing in existing communities and close to essential services.*
- Explore the feasibility of developing age-friendly homes for older people based on age-friendly design principles, in order to inform a model of good practice.*

Include the following text in Section 6.1 of the Housing Strategy

As people age, their housing needs are likely to change. The Policy Statement "Housing Options for Ageing Persons" states "a key principle underpinning Government housing policy is to support older people to live in their own home with dignity and independence for as long as possible". "The aim is to ensure that older people will have greater choice by developing a range of housing options that are suited to their needs, so they can plan ahead and, insofar as possible, choose the right home for them." The plan supports the six principles for housing of the ageing population contained in the document, being:

- 1. Ageing in Place*
- 2. Using Assistive technology*
- 3. Supporting Urban Renewal*
- 4. Promoting sustainable lifetime housing*
- 5. Staying socially connected*
- 6. Working together*

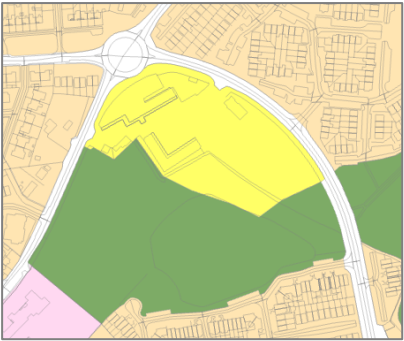
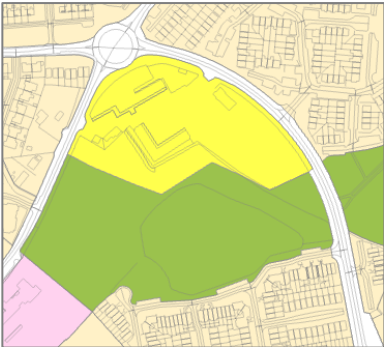
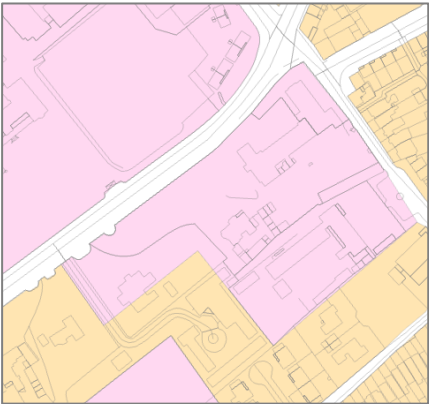
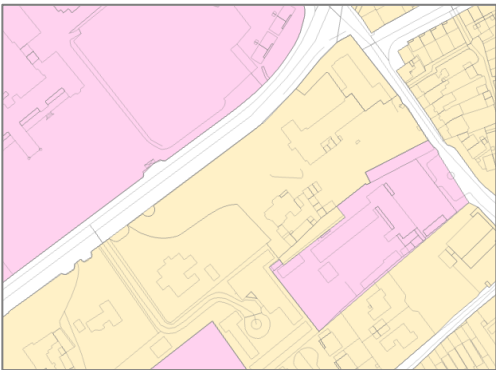
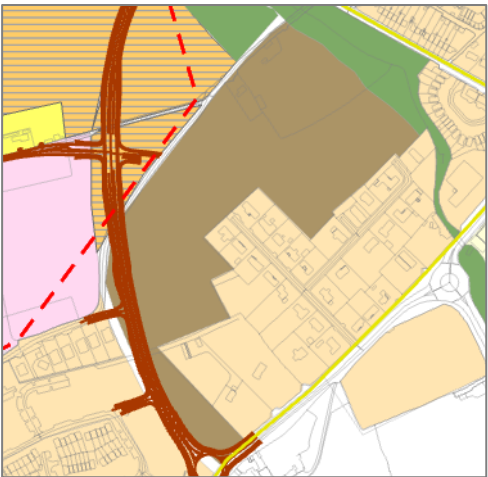
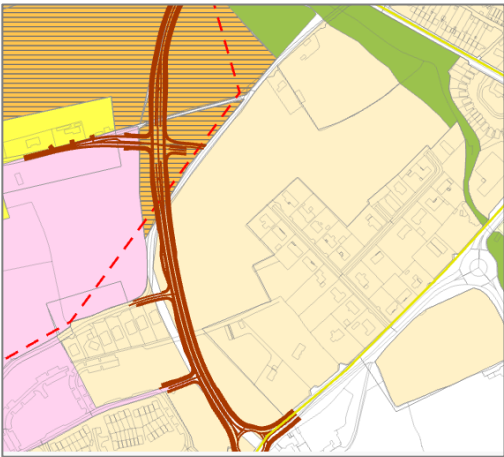
Appendix A

4.4 List of names under submission KKC162-459

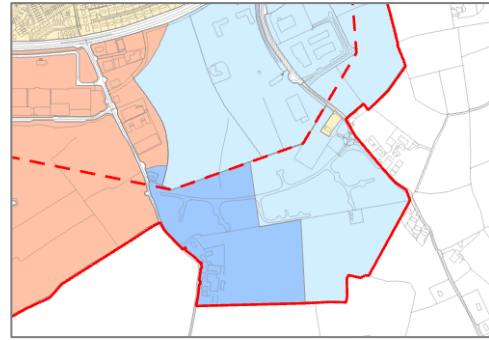
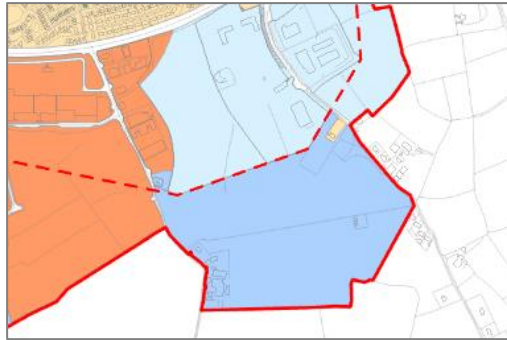
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Amanda Blake	Seamus Harris
Amy Harris	Sinead Nolan
Amy McCollum	Siobhan Whelan
Andrew Cronin	Susan McCollum
Annemaria Harris	Tom Walsh
Aoife Cronin	Tony Power
Becky Power	Willie Foran
Ben O'Keeffe	Yvonne McCollum
Betty Nolan	
Breda Foran	
Brian McCollum	
Brian Power	
Caroline Blake	
Carrie McCollum	
Catherine Power	
Chrissie Phelan	
Cody Power	
Colm O'Keeffe	
Conal Butler	
Denise Walsh	
Eileen Butler	
Elizabeth Power	
Emily Walsh	
Emma Nolan	
Ger Nolan	
Hanna McCollum	
Kathleen Cronin	
Katie Power	
Leish Power	
Liam Collins	
Liam Lavin	
Mark Power	
Mary Ryan	
Mathew Power	
Patricia McCollum	
Patrick Butler	
Patrick Harris	
Peter Walsh	
Rachael Simplicio	
Richard Foran	

6. Appendix B

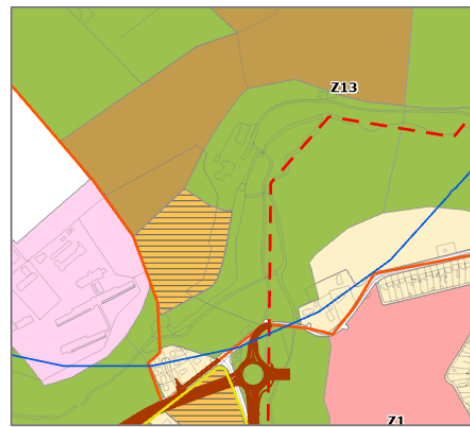
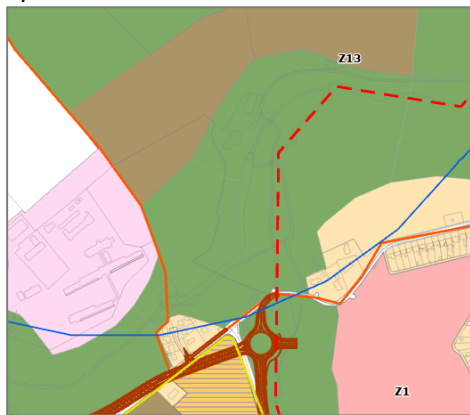
4.5 Amendments to Kilkenny City landuse zoning map

Zoning as presented in Draft Kilkenny City & County Development Plan	Proposed Change to Land Use Zoning map
<p>Submission Ref: KK-C162-124 LOU Investments</p> 	
<p>Submission Ref: KK-C162-234 Sistef St. John of God</p> 	
<p>Submission Ref: KK-C162-272 Tom Philips and Assocaites on behalf of Ormonde Construction</p> 	

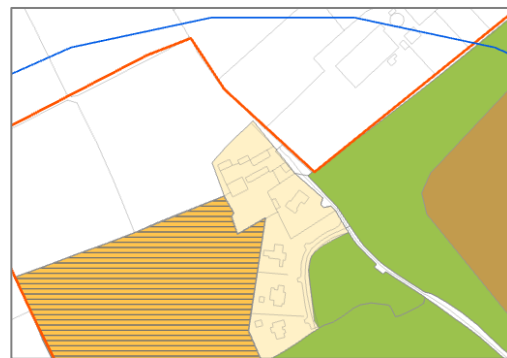
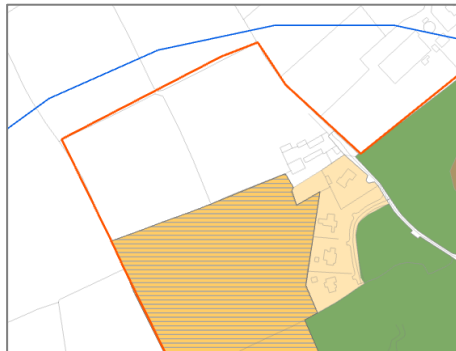
Submission Ref: KK-C162-282 Tom Philips and Associates on behalf of Jangate Ltd



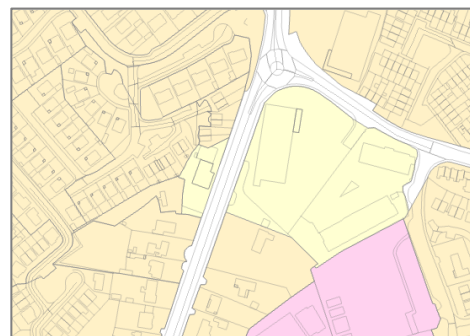
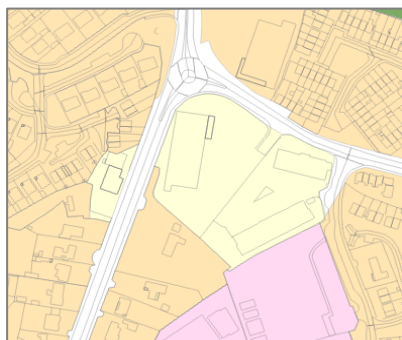
Submission Ref: KK-C162-325 Christine & Gerard Byrne



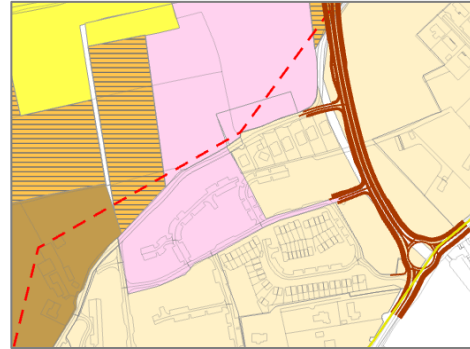
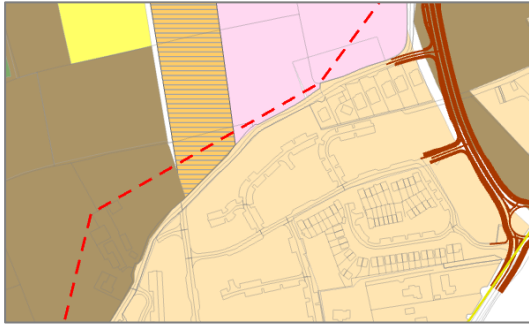
Submission Ref: KK-C162-392 P&M Cantwell



Submission Ref: KK-C162-400 Lidl



Submission Ref: KK-C162-460 John Spain Associates
on behalf of Cairn Homes



Submission Ref: KK-C162-460 John Spain Associates
on behalf of Cairn Homes

