

# **Chief Executive's Report**

**Submissions to:**

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

**December 2025**





Kilkenny County Council  
December 2025

Lar Power,  
Chief Executive

Tim Butler,  
Director of Services

Denis Malone,  
Senior Planner

# Contents

<b>1</b>	<b>Introduction</b>	<b>1</b>
<b>1.1</b>	<b>Purpose and contents of report</b>	<b>1</b>
<b>1.2</b>	<b>Pre-Draft Consultation Process</b>	<b>1</b>
<b>1.2.1</b>	<b>Notice of Consultation</b>	<b>2</b>
<b>1.2.2</b>	<b>Details of Public Display</b>	<b>2</b>
<b>1.2.3</b>	<b>Public Engagement</b>	<b>3</b>
<b>2</b>	<b>Submissions Received</b>	<b>5</b>
<b>2.1</b>	<b>Section A: Submissions from Prescribed Bodies</b>	<b>8</b>
<b>2.2</b>	<b>Section B: Other Submissions</b>	<b>33</b>
<b>3</b>	<b>Summary of Recommendations of the Chief Executive</b>	<b>94</b>

## Executive Summary

The draft Ferrybank–Belview Framework Plan received **77 submissions** from statutory bodies, community groups, businesses, and residents. The feedback reflects strong interest in shaping the area’s future, with recurring themes around **transport safety, zoning strategy, flood resilience, and community infrastructure**. The report summarises the submissions and observations received and provides a response and recommendation from CE to each submission. An overview of key themes and issues is provided below:

### 1. Transport & Movement

- **School Safety:** Concerns about congestion and child safety at St. Mary’s Boys’ National School, with calls for dedicated set-down areas and car parking.
- **Traffic Management:** Requests for speed limit reviews, junction redesign (Tesco roundabout, Aldi junction), and improved pedestrian safety.
- **Permeability & Greenway Access:** Mixed range of views—support for connectivity but concerns about anti-social behaviour; suggestions for lighting and controlled access.
- **Public Transport & Freight:** NTA and TII emphasised bus layover facilities and safeguarding freight corridors; residents sought restrictions on HGV movements through residential areas.

### 2. Zoning & Land Use

- **Residential Development:** Submissions seeking additional housing lands (Abbey Meadows, Christendom, Mount Sion) to meet demand and attract services.
- **Industrial & Port Expansion:** Port of Waterford and industry stakeholders requested strategic landbanks for port-related activity and energy infrastructure.

- **Amenity and Industry Uses:** Conflicting views on proposals for amenity and heritage designations like at Glasshouse within industrial/ Port area, residents favour amenity, industry cites safety and operational needs.

### 3. Flood Risk & Climate Resilience

- **Strategic Flood Risk Assessment:** OPW and OPR highlighted gaps – recommend overlaying flood zones on maps and completing Stage 3 assessments.
- **Drainage & SuDS:** Uisce Éireann supports nature-based solutions and removal of stormwater from combined sewers.
- **Climate Adaptation:** Calls for clearer integration of circular economy principles and Blue-Green Infrastructure Strategy.

### 4. Community & Social Infrastructure

- **Community Hub:** Strong support for securing space in Ferrybank Shopping Centre for a community centre.
- **Education:** Department of Education welcomed school site reservations but requested clarity on co-location and Special Education Needs provision.
- **Heritage & Amenity:** Support for conservation and interpretation measures; mixed views on Glasshouse future designation

### 5. Economic Development

- **Enterprise & Innovation:** Calls for stronger policy support for enterprise centres and links to SETU.
- **Retail Strategy:** Incorporate the Joint Retail Strategy for consistency across Kilkenny and Waterford.

# 1 Introduction

## 1.1 Purpose and contents of report

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.

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

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

The reason for the proposed Variation is to replace the expired Ferrybank Local Area Plan (2017).

The purpose of this Report is:

- To report on the written submissions/observations received in relation to variation No. 6 to the Kilkenny City and County Development Plan (KCCDP) during the public consultation period which ran from the July 18th to September 19th 2025.
- 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.

## 1.2 Pre-Draft Consultation Process

The formal stage of the Public Consultation began with the publication of a notice in the Kilkenny People on Wednesday 16<sup>th</sup> July, and a notice on the Council's website and other social media channels. This notice advertised two elements: an information evening on the 30<sup>th</sup> July 2025 and a general public consultation period from the July 18th to September 19th 2025.

### **1.2.1 Notice of Consultation**

The newspaper notice was published in the Kilkenny People on Wednesday 16<sup>th</sup> July which included details of the public consultation generally, and the time and date for the information session. Details were further placed on the social media sites of Kilkenny County Council. Emails were sent to those who participated in the engagement phase during Issues Paper and Draft Plan preparation stages, including several community groups.

### **1.2.2 Details of Public Display**

The documents put on public display for the proposed Variation were:

- Proposed Variation 6 Changes to CDP Vol 1
- Proposed Variation 6 Ferrybank Belview Framework Plan
- Appendix 1 Ferrybank Belview Technical Appendix
- Appendix 2 Ferrybank Belview Local Transport Plan
- Ferrybank Belview LTP Draft Options Report Supporting Appendix
- Appendix 3 Variation 6 AA NIR
- Appendix 3 Proposed Variation 6 SEA ER
- Appendix 3 Proposed Variation 6 SEA ER App II NTS
- Appendix 3 Proposed Variation 6 SFRA
- Appendix 4 Ferrybank Belview Framework Plan Maps

The documents went on public display for a period of 9 weeks (minimum statutory period of 8 weeks) from the July 18<sup>th</sup> to September 19<sup>th</sup> 2025. A copy of the Proposed Variation, including Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), were placed at the following locations from July 18<sup>th</sup> to September 19<sup>th</sup> 2025:

- Online on the Kilkenny County Council consultation portal <https://ourplan.kilkenny.ie>
- The Planning Department, Kilkenny County Council, John Street, Kilkenny during office opening hours
- Ferrybank Library Belmont Road Ferrybank during opening hours

### **1.2.3 Public Engagement**

A workshop style information session was held on the 30<sup>th</sup> July 2025 in Abbey Community College from 3-5pm and 6.30-8.30pm. Over 40 people attended across the two sessions. This meeting took the format of an open discussion, with those attending providing their views, concerns and options on the draft zoning map and draft plan.

Those present at the workshop were invited and encouraged to make written submissions where relevant covering issues which they felt needed more detailed discussion.

### **1.2.4 Consideration of Variation**

The members of the planning authority are required to consider the proposed variation and this Chief Executive's Report.

If the Planning Authority, after considering a submission, observation or recommendation from the Minister, Office of the Planning Regulator or Regional Authority, decides not to comply with a recommendation made by such, it shall so inform the Minister, OPR or Regional Authority as relevant as soon as practicable by written notice and shall include the reasons for the decision.

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

The members of the authority, having considered the proposed variation and this report may, as they consider appropriate, by resolution,

#### **1. Refuse to make the variation.**

#### **2. Make the variation with or without further modification**

A modification to the variation, must adhere to the following:

(i) may only be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site,

(ii) shall not be made where it refers to –

(I) an increase in the area of land zoned for any purpose, or

(II) an addition to or deletion from the record of protected structures.

### **3. Make the variation with a Material Alteration.**

If it is resolved to make the variation with a change that constitutes a material alteration to the variation, the planning authority must review the alteration in the context of SEA and AA and determine its implications (if any) on the environment. Not later than 2 weeks after the Planning Authority has made a determination in relation to the requirement for SEA/AA the Chief Executive shall specify such period as he or she considers necessary to facilitate any necessary assessments. Thereafter the Planning Authority must publish notice of the proposed material alteration and where appropriate the circumstances in making a determination that AA/SEA is required. This notice is to be published in at least one newspaper circulating in the area and a period of 4 weeks is allowed for public consultation and for lodgement of written submissions or observations.

## 2 Submissions Received

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

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

In total 77 submissions were received by Kilkenny County Council to the Variation No. 6 to the Kilkenny City and County Development Plan (KCCDP), as set out below.

Ref No.	From
KK-C330-1	Aine O'Driscoll
KK-C330-2	Gary Mentanko
KK-C330-3	John Breen c/o Peter Thompson
KK-C330-4	David Halpin
KK-C330-5	OPW
KK-C330-6	Ferrybank Development Partnership c/o Peter Thompson
KK-C330-7	Sheila Scanlon
KK-C330-8	TII
KK-C330-9	EPA
KK-C330-10	Caroline Power
KK-C330-11	HSE
KK-C330-12	Suir Shipping c/o SCA Planning and development Consultant
KK-C330-13	Michael Doyle c/o FHP
KK-C330-14	Aoife O'Donoghue
KK-C330-15	Southeast Port Services c/o SCA Planning and Development Consultants
KK-C330-16	Gyles Quay Residents Group
KK-C330-17	Maire and Paul Roche
KK-C330-18	Robert Murphy
KK-C330-19	David Sinnot on behalf of Port Of Waterford
KK-C330-20	James Robinson
KK-C330-21	Damien Donoghue
KK-C330-22	Sharon Keogh
KK-C330-23	Robert Byrne
KK-C330-24	Justina Zemaityte
KK-C330-25	Kevin Kehoe
KK-C330-26	David Clarke
KK-C330-27	Ting Hu
KK-C330-28	Michael Dunphy
KK-C330-29	Linda Hayes
KK-C330-30	Mary and Eamonn Cunningham
KK-C330-31	SLR Consulting Ireland on behalf of Belgard Estates

KK-C330-32	Sean Phelan
KK-C330-33	Christine Ennis
KK-C330-34	Niamh Dunphy
KK-C330-35	Damien Territt
KK-C330-36	Claire Ryan
KK-C330-37	Patricia Kiely
KK-C330-38	Kilkenny Walsh Limited c/o Peter Thompson
KK-C330-39	Roisin Fitzpatrick
KK-C330-40	Whitebox
KK-C330-41	Southern Regional Assembly
KK-C330-42	Jijan Jolly
KK-C330-43	Department of Housing, Local Government and Heritage
KK-C330-44	ELISBA POULOSE
KK-C330-45	Natália Hoppe
KK-C330-46	Waterford City & County Council
KK-C330-47	Tesco Ireland c/o RMLA Planning Consultant
KK-C330-48	Peter Dunne
KK-C330-49	Catherine Manning
KK-C330-50	Bellevue Residents Association
KK-C330-51	Uisce Eireann
KK-C330-52	Sarah McGrath
KK-C330-53	Barbara Wells
KK-C330-54	Amanda Ennis
KK-C330-55	Electricity Supply Board
KK-C330-56	Soumya Sasidharan
KK-C330-57	Gianina Olariu
KK-C330-58	Rahaf Manaa
KK-C330-59	Joan Frawley
KK-C330-60	Seamus Walsh c/o FHP
KK-C330-61	OPR
KK-C330-62	Eamon, Maura, Edmund Doherty
KK-C330-63	Romania Germani for J & R Canning
KK-C330-64	Newrath Residents and Business Association
KK-C330-65	Ballagh Holdings Ltd/John Spain Associates
KK-C330-66	Michael Morrissey on behalf of Smartply
KK-C330-67	Aislin O'Brien on behalf of Port Authority
KK-C330-68	Land Development Agency
KK-C330-69	Ferrybank Community Development Residents Group
KK-C330-70	Carmel Wemyss
KK-C330-71	Maire and Paul Roche
KK-C330-72	Department of Education
KK-C330-73	National Transport Authority
KK-C330-74	Richard McGrath
KK-C330-75	Anbarasi Nallathambi
KK-C330-76	Sinead O'Donovan
KK-C330-77	Mary Condon

To comply with reporting procedure in the legislation, the submission from the OPR (KK-C330-61) is dealt with first, followed by the other statutory consultees.

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

Section 2.1 of the report deals with all the submissions from the statutory agencies, Government Departments and regulatory bodies.

Section 2.2 deals with all other submissions to the Proposed Variation.

## 2.1 Section A: Submissions from Prescribed Bodies

Sub No.	From	Main Themes	Submission Summary	Chief Executive's Response & Recommendation
KK-C330-61	OPR		<p><b>1. Residential land supply:</b> Having regard to the provision of new homes at locations that can support compact and sustainable development and the co-ordination of housing delivery and infrastructure, and in particular to: NPO 101, NPO 102, and NPO 103 of the NPF to consider the serviceability of land zoned for development; RPO 4 of the RSES to align infrastructure investment with the spatial strategy of the RSES; and section 4.5.2 of the Development Plans, Guidelines for Planning Authorities (2022) to integrate infrastructure planning with new development, the Office recommends that the Planning Authority reviews table 6-6 Site Assessment Findings of the Settlement Capacity Audit (SCA) (Appendix 1 Ferrybank Belview Technical Appendix) and figure 5-4 Draft Zoning Map, and where there are inconsistencies, lands should be re-zoned to ensure that the findings of the SCA informs the proposed zoning objectives and that housing can be realistically achieved on the zoned lands.</p> <p><b>2. Economy and employment:</b> Having regard to the location of employment lands in locations that can support compact and sustainable development, and in particular to: NPO 18 of the NPF (locations for strategic employment development);, RPO 62 of the RSES (locations for employment development); and section 6.2.5 of the Development Plans, Guidelines for Planning Authorities (2022), the Office recommends that the Planning Authority:</p>	<p>1. Noted. SCA (found within the Technical Appendix) section 5.6, with reference to site G amended to change site G from Strategic Reserve (S/R) to Resi 1 which is consistent with preceding text and tables.</p> <p>In response to the Section 28 Guidelines on Revised NPF Implementation and new housing growth requirements additional SCA classified Tier 1 lands are now proposed to be zoned as residential. These are:</p> <ul style="list-style-type: none"> <li>- Ard Ri (Site S) – Table 5.2 of Appendix 1 on Settlement Capacity Assessment shows this site is serviced and ready to be activated for residential purposes.</li> <li>- Strategic Reserve Sites – SR1 (Site C), SR2 (Site I) and SR3 (Site H) now proposed to be zoned residential. No updates to SCA required. <sup>1</sup></li> </ul> <p>2. Sites E-B, E-C, E-D, E-E &amp; E-F are located between the active Port area ( to the southeast) and the operating facilities of Tirlan and Kilkenny Chees and the WWTP to the west. Sequentially the lands are appropriately located and services can be readily extended to</p>

		<p>(i) provides a clear rationale for the zoning of sites for PFI – Port Facilities and Industry identified as E-B, E-C, E-D, and E-E in the Settlement Capacity Audit (SCA), and demonstrates the potential serviceability of the lands and consistency with sustainable planning and sequential development principles; and</p> <p>(ii) if a clear rationale cannot be provided, figure 5-4 draft zoning map should be amended to omit the PFI zoning for the sites identified as E-B, E-C, E-D, and E-E in the SCA.</p> <p><b>3. Sustainable transport:</b> Having regard to the need for integration of land use and sustainable transportation, and in particular to: NPO 107 and National Strategic Outcome 5 of the NPF (sustainable mobility); NPO 93 of the NPF (air quality); RPO 151 of the RSES (integration of land use and transport); RPO 152 of the RSES (permeability for walking, cycling and public transport modes); RPO 157 of the RSES (preparation of Local Transport Plans); and the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, the Climate Action Plan 2025 and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021), the Office recommends that the Planning Authority:</p> <p>(i) identifies priority active travel projects to be progressed during the plan period together with timeframes;</p> <p>(ii) includes policy support for the implementation of the proposed interventions, identifying connectivity for existing and proposed active travel networks and public transport networks for existing and proposed residential and employment lands and opportunity sites; and</p>	<p>service. ., it is proposed to retain the zone ‘PFI’ zoning set out in the draft FP zoning map.</p> <p>Note also proposed rezoning of Site E-1 from agriculture to BETP, as per response to Port of Waterford Submission KK-C330-19.</p> <p>3. Sustainable Transport:</p> <p>(i) Proposed measures around potential future walking, cycling and permeability improvements for the Ferrybank-Belview area are in Chapters 10 – 13 of the Local Transport Plan. This detailed content has been summarised in section 12.4 Development of an Active Travel Network within the Framework Plan. Wording here will indicate the proposals as objectives of the Plan. Proposed implementation timelines for these active travel measures are set out in Table 18-1 of the LTP.,The inclusion of table 18-1 from the LTP, which summarises active travel measures and timelines may enhance clarity. This table is to be inserted in the Framework Plan after section 12.8.</p> <p>(ii) Policy measures for active travel are also highlighted in Chapter 10 of the Local Transport Plan. It not considered necessary to replicate this text in the Framework Plan having regard to 3(i) above.</p> <p>(iii) Section 10.2.3 of the LTP sets mode share targets for Ferrybank-Belview out to 2040. Objective MAT1 highlights the mode-share targets for the plan study area and over the plan period. This is sufficient..</p> <p>4. Updates provided on these issues as appropriate under the OPW CF submission .KK-C330- 5 OPW</p>
--	--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

		<p>(iii) includes an effective mode share target monitoring programme for the Ferrybank / Belview area.</p> <p><b>4. Flood risk:</b> Having regard to: NPO 78 of the NPF (avoiding inappropriate development in areas at risk of flooding that do not pass the Plan Making Justification Test (Justification Test); RPO 116 of the RSES (considering future appropriate land-use policies in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)); and the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009),</p> <p>the Office recommends that the Planning Authority:</p> <p>(i) review the Strategic Flood Risk Assessment to:</p> <p>a) determine if stage 3 flood risk assessments are required for lands along either side of watercourses outside of the Waterford Area for Further Assessment which have no flood risk extents illustrated on the flood zone mapping, if required undertake stage 3 flood risk assessments and if necessary re-zone lands for an appropriate use;</p> <p>b) identify flood risks from all sources of flooding including detail provided in Appendix 1 Ferrybank Belview Technical Appendix and Office of Public Works (OPW) Minor Works Scheme applications to further inform the Strategic Flood Risk Assessment, and if necessary re-zone lands for an appropriate use; and</p> <p>c) address existing development lands zoned PFI – Port Facilities and Industry and Public Utility where there is an overlap of Flood Zone A and B, and if necessary re-zone lands for an appropriate use to ensure that highly vulnerable development is not located in Flood Zone A or B, and less vulnerable</p>	<p>5. Noted. Zoning map to be amended to change zoning for Gorteens Castle site to Open Space.</p>
--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------

			<p>development is not appropriate in Flood Zone A, unless all criteria and sub criteria of the Justification Test have been satisfied;</p> <p>(ii) overlay the flood zone mapping with the land use zoning mapping as part of the Proposed Variation No. 6 to the Kilkenny City and County Development Plan 2021-2027 (proposed Variation); and</p> <p>(iii) overlay the flood zones maps and future scenario maps with the land use zoning maps as part of the proposed Variation.</p> <p>The Planning Authority is advised to liaise with the OPW to address this recommendation.</p> <p><b>5. Built heritage:</b> Having regard to the provisions for the protection of built heritage and in particular to: NPO 89 of the NPF (protect, conserve and enhance natural, cultural and built heritage); NPO 90 of the NPF (enhance, integrate and protect built heritage assets); and RPO 206 of the RSES (architectural heritage), the Office recommends that the Planning Authority amends the draft zoning map (figure 5-4) to ensure that the Gorteens Castle lands are appropriately zoned as set out at section 8.6 Appropriate Zoning of the Proposed Variation No. 6 to the Kilkenny City and County Development Plan 2021-2027.</p>	
KK-C330-5	OPW	Flood risk management	<ol style="list-style-type: none"> <li>1. It is difficult to assess if the sequential approach has been followed without the inclusion of Flood Zone mapping overlaid on the land use zoning mapping. Kilkenny County Council should provide such a map and consider its inclusion in Appendix 4 Ferrybank - Belview Framework Plan Maps.</li> <li>2. <b>Flood Risk Assessment:</b> Only a proportion of the plan area is located within the Waterford AFA. The watercourses within the AFA area were assessed as part of the National CFRAM programme. There are watercourses outside the AFA which have no flood risk extents shown on the flood risk mapping</li> </ol>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1 An overlay of Flood Zone and future scenario mapping and adopted land use zoning will be prepared and included in final Plan/SFRA documents.</li> <li>2 Update Flood Zone mapping in the SFRA with higher resolution maps.</li> <li>3 Zoning has been informed by various considerations including environmental sensitivities relating to flood risk, ecology and landscape. No amendment required.</li> </ol>

		<p>provided in the SFRA. While the National Indicative Fluvial Mapping (NIFM) programme produced mapping for watercourses greater than 5km2 that were not included in the National CFRAM programme, these watercourses appear to have not met the criteria for inclusion in NIFM.</p> <p>3. The lands along either side of these watercourses have been zoned as Passive Open Space, however it is unclear how the area of these zonings have been arrived at without flood extents. The zonings outside these Passive Open Space zonings are BETP – Business, Enterprise and Technology Parks, SR – Strategic Reserve, Agriculture, Public Utility and PFI – Port Facilities and Industry.</p> <p>4. Kilkenny County Council should review if stage 3 flood risk assessments are required to inform the land use zonings and the SFRA. An evaluation of site-specific flood risk assessments may also assist with establishing flood zones. The submission identifies water courses as follows:</p> <ul style="list-style-type: none"> <li>• Felminstown Stream through Grannagh Industrial Estate</li> <li>• Strangsmill Stream through west of Framework Plan area</li> <li>• Various streams in east of Framework Plan area</li> </ul> <p>5 <b>Drainage/SuDs/Flooding:</b> The Section Drainage/SuDs/Flooding in Appendix 1 Ferrybank – Belview Framework Plan contains information regarding flooding and the constraints of drainage systems that are not included in the SFRA. This includes notes of properties that have flooded and a stream which floods northeast of Residential Site L - Rockshire north east. The SFRA should identify flood risks from all sources of flooding.</p> <p>6 <b>Minor Works Scheme:</b> Kilkenny County Council have submitted two applications for funding from the OPW under the Minor Works Scheme to address flooding issues in Drumdowney, where at least one property has</p>	<p>4 Update Flood Zone mapping in the SFRA with higher resolution maps.</p> <p>5 The SFRA will be updated to include information from the Proposed Variation on pluvial flooding and flooding relating to constraints in drainage systems.</p> <p>6 To insert the following into the SFRA Report: <i>“Kilkenny County Council have submitted two applications for funding from the OPW under the Minor Works Scheme to address pluvial flooding issues in Drumdowney, where at least one property has previously flooded and others are at risk of flooding or of being cut off by flooding”.</i></p> <p>7 Noted. To insert the following into the SFRA: <i>“Historical indicators taken into account in the identification include flood events, such as during Storm Babet (October 2023).”</i></p> <p>8 Noted</p> <p>9 Section 3.5 of the SFRA Report will be updated as follows (text to be added in bold, text to be deleted in strikethrough): <i>Predictive indicators, including <b>those detailed at Table 3 of this report.</b> <del>the emerging findings of the Ferrybank-Belview Flood Relief Scheme Project.</del></i></p> <p>10. Noted.</p> <p>11. As identified in the SFRA and under Section 5.7 <i>“Land Use Zones - Overriding Flood Risk-related Limitation on the above Land Use Zones”, “There are a number of instances where Flood Risk Zones A and B overlap with a variety of the above land-use zoning objectives, including Open Space and Water Compatible Development. Uses under all zoning objectives shall be limited to water compatible uses in Flood Zone A, and less vulnerable or water compatible uses in Flood Zone B. Detailed, site specific Flood Risk Assessment will be required in these areas. This</i></p>
--	--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<p>previously flooded and others are at risk of flooding or of being cut off by flooding. These flooding issues have not been discussed in the SFRA or influenced the flood zonings.</p> <p>7 <b>Past Flood Events:</b> The OPW have a record of a flood event that occurred close to the Waterford / Ferrybank boundary which is awaiting upload to floodinfo. To request information on this event a Data Request Form, available from <a href="https://www.floodinfo.ie/contact/">https://www.floodinfo.ie/contact/</a> should be submitted to the OPW Data Management Section via email (<a href="mailto:flood_data@opw.ie">flood_data@opw.ie</a>).</p> <p>8 There appears to be further events that have occurred which have not been reported to OPW for inclusion in the past flood database such flooding caused during Storm Babet in October 2023. Kilkenny County Council should submit flood event reports and any other information on past floods for inclusion on in the database to OPW by emailing <a href="mailto:reportfloodevent@opw.ie">reportfloodevent@opw.ie</a>.</p> <p>9 <b>Flood Relief Scheme:</b> Section 3.2 Findings and Adequacy of Existing Information and Delineation of Flood Zones in the SFRA references a “Ferrybank – Belview Flood Relief Scheme Project”, however there is no further discussion or references to the scheme in the SFRA. Unless this is a Kilkenny County Council project there is no scheme planned or underway for Ferrybank – Belview. A scheme by Waterford City &amp; County to protect the rail line has commenced construction and this maybe a reference to this scheme.</p> <p>10 <b>Overriding Flood Risk-related Limitation:</b> The OPW welcomes ‘Overriding Flood Risk-related Limitation on the above Land Use Zones’ provided in Section 5.7 Land Use Zones that, “Uses under all zoning objectives shall be limited to water compatible uses in Flood Zone A, and less vulnerable or water compatible uses in Flood Zone B. Detailed, site specific Flood Risk</p>	<p><i>limitation shall take primacy over any other provision relating to these land use zoning objectives.”. SFRA will updates to add this area to the Justification Test table set out in the SFRA Report at Table 6.</i></p> <p>12. Detailed under Section 3.5 “Sustainable Drainage Systems and Surface Water Guidance and Strategy” of the SFRA. No change proposed.</p>
--	--	--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<p>Assessment will be required in these areas. This limitation shall take primacy over any other provision relating to these land use zoning objectives” This section has been referred to in both Justification Tests that are supplied where the tests cannot be satisfied as the existing developments are situated at the periphery of the plan area.</p> <p><b>11 Inappropriate Development:</b> No discussion has been provided for existing lands zoned PFI –Port Facilities and Industry and for a very small existing area zoned Public Utility to the east of the plan area where there is a small overlap of Flood Zone A and B. Highly vulnerable development is not appropriate in Flood Zone A or B, and less vulnerable development is not appropriate in Flood Zone A, unless all criteria and sub criteria of the plan making justification test have been satisfied.</p> <p><b>12 Consideration of Climate Change Impacts</b></p> <p>The OPW welcomes the discussion on Climate Change in Section 3.4 of the SFRA, the inclusion of Future Scenarios Mapping in Appendix II of the SFRA, and the Infrastructure Development Management Standard INF-DM4 regarding flood risk assessment and climate change. It is noted that this guidance is primarily focused on consideration of climate change at the development management stage.</p> <p>In line with the Guidelines, while Flood Zones are defined on the basis of current flood risk, planning authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives.</p>	
--	--	--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

		<p>The potential future flood extents included in Appendix II of the SFRA might be shown overlaid with the land use zonings, to highlight any developments that could potentially be affected by climate change.</p> <p>Areas in the vicinity of the unmapped watercourses could also be potentially at risk of flooding in the future, however this could only be established through modelling of the watercourses.</p> <p>Nature-based Solutions and SuDS The OPW welcomes INF-DM5 "Minimise flood risk arising from surface water flooding by promoting the use of natural flood risk management measures including sustainable drainage systems, minimising extent of hard surface/paving, and smart solutions such as innovative green infrastructure". In addition, the OPW welcomes the discussion on Sustainable Drainage Systems and Surface Water Guidance and Strategy in Section 3.5 of the SFRA.</p> <p>The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water runoff at key development sites, and also that the SFRA identifies where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions. It is noted that Section 3.5 of the SFRA provides a list of various SuDS techniques applicable to opportunity sites, and discussion on the types of features that might be appropriate at various different types of site. This includes sites with high groundwater levels, steeply sloping, very flat, and sites that include areas of floodplain. It might be beneficial if the opportunity sites were assessed in order to ascertain whether any of the above referenced characteristics influencing choice of SuDS feature are applicable, and which techniques would therefore be appropriate.</p>	
--	--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

KK-C330-8	TII	Transport	<p>1. <b>N24 Grannagh Business Park and adjoining lands:</b> TII notes that the Grannagh Business Complex and adjoining lands are zoned 'Business, Enterprise and Technology Park' in the Draft Zoning Map, Figure 5-4, however, the lands adjoin the N24, national road, where TII's records indicate an 80 kph speed limit applies. Certain access may be available from local road L7441. To ensure conformance with official policy provisions included in NPO 107/NSO 2 and RPO 140, potential conflict with official policy concerning development management and access to national roads should be resolved prior to finalisation of Proposed Variation no. 6 in the interests of adherence to the provisions of official policy and in the interests of the safety of all road users.</p> <p>2. <b>N29 Belview Port Access Strategy:</b> With respect to Belview Port Access Strategy agreed measures which are outlined in Section 12.6 of the Framework Plan and in Section 15.2.3 of the Local Transport Plan, it is noted that no associated Objective appears to be included in the Framework Plan in Section 8.7 or Section 12.10 which outlines relevant Belview Port and Industrial Area Objectives and Movement and Active Travel Objectives respectively. TII Recommendation to align the objectives in the Framework Plan and Local Transport Plan with those included in Section 5.2.2 of the Ferrybank – Belview Local Area Plan 2017 in the interests of consistency.</p> <p>3. <b>TII Publications:</b> it does not appear that the Framework Plan or Local Transport Plan make any reference to TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes). TII Publications DN-GEO-03030 is a critical step in the design phase of any proposals impacting national roads and, in the interests of clarity, TII would welcome specific reference to TII</p>	<p>Noted.</p> <p>1. It is noted that the Grannagh Business Park has been in existence for over 40 years with existing legacy access. Any future redevelopment on the site will be required to consider appropriate access arrangements in consultation with TII.</p> <p>2. Noted.</p> <p>Amendment to be made to section 12.10 of the Framework Plan to insert new text as part of objective MAT22 (note changes to objectives numbering in this chapter in line with amendments proposed for submission 73 point 1 which proposes that all transport objectives from the LTP are now included in the Framework Plan for clarity) include reference to the objectives included in the CDP with respect to the N29/Port Road to include:</p> <ul style="list-style-type: none"> <li>• 5J To continue to work with Transport Infrastructure Ireland to finalise an approach for access to the zoned lands along the N29 at Belview.</li> <li>• 12U Construct a roundabout on the N29 at the L3412 (Rathculliheen) junction.</li> <li>• 12V Provide for traffic calming measures between the roundabout and the port gate on the N29.</li> <li>• 12W To introduce a 60km/hr speed limit on the section of the N29 between the roundabout and the port gate.</li> </ul> <p>Amendment to be made to section 8.7 of the Framework Plan, to Belview Port and Industrial Area Objective BPIA6 to read: <i>Work with TII to implement KCC CDP objectives with regards to the N29/Port Road (see section 15.2.3).</i></p>
-----------	-----	-----------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<p>Publications DN-GEO-03030 in the Framework Plan and Local Transport Plan prior to finalisation. TII Recommendation: Specific reference to the requirement to adhere to TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes) should be included in the Framework Plan and Local Transport Plan prior to finalisation.</p> <p>4. <b>Framework Plan and Local Transport Plan Specific Measures:</b> TII Recommendation: continued consultation with TII in relation to specific proposals with the potential to impact the national road network should continue.</p>	<p>3 Noted. Amendment to be made to page 87 of the Framework Plan to the first bullet in the second column to read: Kilkenny County Council will ensure that any proposals will comply with the Department of Environment, Community and Local Government’s Spatial Planning and National Roads guidance, TII Publications and NTA Design Standards, including the Design Manual for Urban Roads and Streets and the Cycle Design Manual, <b>and TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes).</b> It is noted that reference is made to the publication on Part A Page 12 of the Local Transport Plan. No amendment required.</p> <p>4. Noted, no amendment required.</p>
KK-C330-9	EPA	Environment	<p>1. EPA recommend that the attached guidance document ‘<i>SEA of Local Authority Land Use Plans – EPA Recommendations and Resources</i>’ is taken into account in finalising and implementing the variation and that the Variation aligns with key relevant higher order plans and programmes.</p> <p>2. In October 2024, the EPA published the latest iteration of our 4-yearly State of the Environment Report. This report should be considered, and relevant aspects integrated as appropriate, in implementing the Variation outputs/recommendations. It is available at: <a href="https://www.epa.ie/our-services/monitoring--assessment/assessment/state-of-environment-report/">https://www.epa.ie/our-services/monitoring--assessment/assessment/state-of-environment-report/</a>.</p> <p>3. KCC should screen any future amendments to the Variation for likely significant effects.</p>	<p>1 The ‘SEA of Local Authority Land Use Plans – EPA Recommendations and Resources’ document has been considered in the SEA of the Plan and will be kept on file for reference throughout the SEA process. Kilkenny County Council has ensured that the Proposed Variation aligns with and is consistent with higher-level plans and programmes, including the National Planning Framework and the Regional Spatial and Economic Strategy. No amendment required.</p> <p>2 The EPA’s 2024 State of the Environment Report has been considered in the preparation of the Proposed Variation and associated SEA Environmental Report. No amendment required.</p> <p>3 Any future amendments will be screened for effects in accordance with SEA Regulations and using a methodology consistent with the method of</p>

			<p>4. Once the Variation is adopted, you should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> <li>• How environmental considerations have been integrated into the Variation.</li> <li>• How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Variation.</li> <li>• The reasons for choosing the Variation adopted in the light of other reasonable alternatives dealt with; and,</li> <li>• The measures decided upon to monitor the significant environmental effects of implementation of the Variation.</li> </ul> <p>KCC should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.</p>	<p>assessment applied in the SEA of the Proposed Variation. No amendment required.</p> <p>4 An SEA Statement will be prepared once the Variation is made. A copy of the SEA Statement will be circulated to environmental authorities consulted during the SEA process. The cited Guidance will be considered in the preparation of the SEA Statement. The relevant environmental authorities have been and continue to be consulted with through the SEA/Proposed Variation preparation/making process. No amendment required.</p>
KK-C330-11	HSE	Transport	<p>1. <b>Climate Action (Section 3):</b> explanations of Climate Mitigation and Climate Adaptation were found to be confusing by not making a clear distinction between actions to reduce green-house gas emissions (mitigation) and how the council adapts to climate change to (a) ensure business continuity in delivering services and (b) address climate hazards to protect the public. The NEHS recommends great clarity is provided on the meaning of Climate Mitigation and Climate Adaptation with respect to this plan. The NEHS recommends a re-assessment of climate related risks that may potentially affect the people of Ferrybank/Belview in order to action on all relevant hazards.</p> <p>2. <b>Vision and Strategic Objective (Section 4):</b> The NEHS recommends greater ambition is demonstrated in the vision and strategic objectives to deliver/contribute to “a healthy Ireland, where everyone can enjoy physical</p>	<p>1-6. The Kilkenny County Development Plan 2021-2027, Chapter 2 Climate Change provides relevant text in relation to these points, as does the County Kilkenny Climate Action Plan 2024-2024. The Framework Plan also takes into account the joint Blue and Green Infrastructure (BGI) Strategy of Kilkenny County Council and Waterford City and County Council plan in particular Theme 5 on a Resilient and Climate Positive Waterford MASP.</p> <p>Amendment to be made to Section 3.1 Climate Action Context of the Framework Plan to add new text as follows:</p> <p><i>‘This Framework Plan has been formulated in alignment with Ireland’s national circular economy policy which aims to transition from a linear to a circular economy focusing on resource efficiency, waste reduction and sustainable economic growth.’</i></p>

			<p>and mental health and well-being to their full potential, where well-being is valued and supported at every level of society and is everyone’s responsibility”</p> <p>3. <b>Development Strategy and Urban Design (Section 6):</b> Overall urban development principles are laid out under section 6.3.3 including a principle on “climate action”. This principle doesn’t refer to Adaptation as a core element of the principle and limits action to a nature-based solutions approach. The NEHS recommends a rewrite of the climate action principle under the overall urban development principles to indicate a clear understanding of action in both mitigation (reducing green-house gas emissions) and adaptation. Adaptation if interpreted to include adoption of nature-based solutions should also allow for non-nature-based solutions. For example trees to provide shade in heatwave events is a nature-based solution but bus shelters also provide shelter in the context of a built environment solution.</p> <p>4. <b>Communities (Section 9):</b> As stated in the introduction community and social infrastructure includes a wide range of services that contribute to quality of life within an area. While such a statement covers some aspects of health it doesn’t fully encapsulate the wider role of such infrastructure in promoting and protecting population health.</p> <p>5. <b>Infrastructure (Section 13):</b> The sub section on Waste Management appears limited by only referencing a waste management facility that the public will have access to in Grannagh, Co. Kilkenny. The NEHS recommends the plan should set out how the waste hierarchy will be applied to prioritise the elimination of waste in the first place, enabling reduce, reuse and recycling</p>	
--	--	--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

			<p>behaviour across the community and how the right to repair will be supported.</p> <p>6. <b>Disaster Risk Management:</b> The plan does make reference to a limited range of disaster risks with respect to Control of Major Accident Hazards (Seveso III Directive) under Section 13 Infrastructure and refers specifically to a Strategic Flood Risk Assessment (SFRA) under Section 10 Heritage and Environment. It does not appear to integrate consideration of wider climate related hazards within an Emergency Management Framework to prevent, mitigate, prepare for, respond and build back better safer and stronger in terms of identified hazards. For example heat and drought are possible hazards for the south east of Ireland and begs the question how will this plan respond to reduce risk, exposure and vulnerability in heatwave and drought events? The NEHS recommends that the connection between community and social infrastructure with population health is recognised and that the plan has a responsibility to deliver upon the Healthy Ireland framework referred to earlier in this submission. As the stated earlier the NEHS recommends a re-assessment of climate related hazards which should be followed by an action plan to deliver action at each step along the Emergency Management Cycle, namely, Prevention, Mitigation, Preparedness, Response and Build Back Better (safe and stronger). Use of the Sendai Framework for Disaster Risk Reduction 2015 – 2030 is a useful tool in this regard.</p>	
KK-C330-19	David Sinnott/ Port of Waterford	Economic Development	<p>1. <b>Port and Landside Expansion:</b> There is a need to identify strategic landbanks for future port related activity expansion to and beyond 2040 and to secure these in current and future statutory development plans (which will be 10-year in duration and more strategic in advance planning).</p>	<p>Noted.</p> <p>1. Noted. On reflection of the historical zoning of the site, the strategic nature of the Port and the importance of indicating preferred landbanks to facilitate future development as advocated in planning</p>

			<p>2. <b>N29 - National Primary Road:</b> capacity of the N29 for port access commercial traffic must be prioritised and protected. It is important going forward that there is meaningful engagement and consultation with POWC as the major stakeholder and representative body in the Belview port area, to gain a fuller understanding of the current and future scale and nature of operations at the port and on the adjacent lands to underpin strategic transportation initiatives in the future.</p> <p>3. <b>Glasshouse Amenity Park Proposal:</b> Long term proposal to develop an amenity park at the 'Glasshouse' site conflicts with the proposals to enhance the capacity of the N29 to facilitate expansion of the Port and gives significant concerns in relation to health &amp; safety and the operational needs of a national port.</p>	<p>policy, the following amendments to the zoning designations for the Port have been made:</p> <ul style="list-style-type: none"> <li>- Port Site E-I: Change from agriculture to Business, Enterprise and Technology Parks (BETP)</li> </ul> <p>Note also proposed zoning changes for site E-B, E-C, E-D, and E-E to PFI as per OPR submission response no. KK-C330-61</p> <p>2. Noted. The N29 is part of the National Road Network whose function is to ensure the strategic movement of goods. KCC will continue to engage with POWC and TII on capacity and safety issues.</p> <p>3. See comments in relation to Glasshouse site under submission 12 below.</p>
KK-C330-41	Southern Regional Assembly	Economic Development	<p>1. <b>Climate Action:</b> it is recommended that the draft Framework Plan is amended to incorporate considerations on the circular economy, onshore wind and solar, and energy efficiency. Include additional text to provide reference to the Southern Regional Assembly's 'Our Green Region - a Blue Green Infrastructure and Nature-based Solutions Framework for the Southern Region' document in Section 3.0 of the draft Framework Plan.</p> <p>2. <b>Core Strategy and Zoning:</b> The current approach to proposed density range for lands zoned 'New Residential' is restrictive with the minimum density applied falling at the lower end of the range of the 35-50 dwellings per hectare generally recommended for this settlement type in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities. This approach does not fully reflect opportunities arising from planned transport initiatives such as Waterford Bus Connects that will accommodate greater accessibility to public transport provision in the draft</p>	<p>Noted.</p> <p>1 The Kilkenny County Development Plan 2021-2027, Chapter 2 Climate Change provides relevant text in relation to these points, as does the County Kilkenny Climate Action Plan 2024-2024 with actions in relation to energy efficiency under Strategic Goal 2 Built Environment and Transport, circular economy under Strategic Goal 5 Sustainability and Resource Management. Wind and solar are covered by Chapter 11 Renewable Energy within the County Development Plan. No change proposed as existing policy will apply.</p> <p>2 35-50 dph is considered a minimum density by Kilkenny County Council, with developers encouraged to maximise site density where appropriate. No amendment required.</p> <p>3 Noted. Where practicable, the colour palette set out in the zoning maps has been updated in alignment with the Current Local Area Plans set out</p>

		<p>Framework Plan area. Accordingly, it is recommended that Kilkenny County Council adopt a more diverse and graduated approach to residential density for lands zoned 'New Residential,' with clear differentiation based on proximity to key planned transport corridors and compact growth principles with the objective of overall higher density than set out in the Draft Framework Plan.</p> <p>3. <b>Zoning Map:</b> The chosen colour palette for the draft zoning map (Figure 5-4 Draft Zoning Map), combined with the use of Open Street Mapping, makes the zoning map difficult to interpret. Several zoning colours are similar, which makes different zoning types difficult to distinguish. A more distinctive colour palette, supported by a neutral base map (for example OSI mapping similar to that used in the 2017 LAP), would make zoning boundaries clearer and allow for ease of interpretation.</p> <p>4. <b>Economic Development and Retail:</b> Having regard to Waterford MASP Policy Objective 17 – Enterprise Supports, it is considered that Section 7.0 could be strengthened with additional policy statement in support of enterprise &amp; innovation (including development of enterprise centres referred to at Section 4.1 of the draft Framework Plan) and the opportunities to develop links to SETU in the Ferrybank/Belview area. The addition of a related Economic Policy Objective at Section 7.4 would provide strong policy support for enhanced opportunities for enterprise and innovation.</p> <p>Having regards to Waterford MASP Policy Objective 19, it is recommended that the Joint Retail Strategy be formally incorporated as part of this variation to ensure consistency across the two local authority areas (Waterford City and County Council, and Kilkenny County Council), as well as to provide clear</p>	<p>on MyPlan.ie – the national web map portal for zoning. Bespoke zoning objectives specific to the Ferrybank Belview area which cannot be directly aligned with a national zoning category/colour scheme are retained.</p> <p>4 The Joint Retail Strategy is formally incorporated as part of this variation. Include text in plan <b><i>'To implement the recommendations and Objectives of the Joint Retail Strategy (JRS) for the Waterford City Metropolitan Area'</i></b>.</p> <p>5 Noted. Amendment made to section 8.7 Belview Port and Industrial Area Objectives with addition of new objective: <i>'BPIA1 Support the Belview Port's wider role as a multi-modal port and economic driver for the South-East.'</i></p> <p>6 The following amendment will apply regarding the Communities chapter: Amendment to section 9.4 to add paragraph at the end of this section to read: <b><i>Access to education opportunities and lifelong learning is supported along with key associated policy such as RSES RPO 186 Lifelong Learning and the SRA publication Towards a Learning Region (2022), Waterford MASP PO 23 - Lifelong Learning and the UNESCO Learning City Status for Waterford achieved in 2024.</i></b></p> <p>Amendment to section 9.7 Community Objectives to add: <b><i>C10 Support the UNESCO Learning City initiative.</i></b></p> <p>7. Joint Blue Green Infrastructure Strategy is formally incorporated as part of this variation. Insert text to Framework Plan that the plan <b><i>'has regard to the recommendations and objectives of the Blue Green Infrastructure (BGI) Strategy for the Waterford City Metropolitan Area'</i></b>.</p>
--	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<p>guidance for future retail development, and support the coordinated delivery of services and infrastructure between both local authorities.</p> <p>5. <b>Belview Port and Industrial Area:</b> Having regard to Waterford MASP PO15 (Port of Waterford) and the port’s status as a Port of National Significance (Tier 2), the planning authority is requested to review and strengthen (where appropriate) Belview Port and Industrial Area Objectives at Section 8.7 to support the port’s wider role as a multi-modal port and Economic Driver for the South-East.</p> <p>6. <b>Communities:</b> It is recommended that the draft Framework Plan be strengthened by including references to RSES RPO 186 Lifelong Learning and the SRA publication Towards a Learning Region (2022) under Section 9.0 Communities, in support of promoting education opportunity and skills development.</p> <p>Having regard to Waterford MASP PO 23 - Lifelong Learning and the UNESCO Learning City Status for Waterford achieved in 2024, it is recommended that the draft Framework Plan reference the Learning City initiative in Section 9.0 and support for the UNESCO Learning City initiative included as a Community Objectives at Section 9.7.</p> <p>7. <b>Heritage and Environment and Tourism, Arts and Culture:</b> It is recommended that the Joint Blue Green Infrastructure Strategy be formally incorporated as part of this variation to ensure consistency across the two local authority areas (Waterford City and County Council, and Kilkenny County Council), as well as to provide clear guidance for future blue green infrastructure considerations and support the coordinated delivery of services and infrastructure between both local authorities.</p>	
--	--	--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

KK-C330-43	Department of Housing, Local Government and Heritage	Heritage	<ol style="list-style-type: none"> <li>1. The Department recommends that the SEA Environmental Report makes reference to the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999).</li> <li>2. The Department advises that there are 45 recorded monuments in the Plan area that are listed in the RMP and/or the SMR.</li> <li>3. The Department also recommends that the SEA Environmental Report makes reference to the key supporting national policy in relation to Cultural Heritage in the National Planning Framework report: Ireland 2040 – Our Plan   Strategic Environmental Assessment Scoping Report (Department of the Housing, Planning, Community and Local Government, 2018).</li> </ol>	<p>Noted</p> <ol style="list-style-type: none"> <li>1. With respect to the Department’s recommendation in this section, the SEA Environmental Report makes reference to the “Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999)” within Appendix I.</li> <li>2. Noted.</li> <li>3. The SEA Environmental Report already makes reference to a range of key supporting national policy documents in relation to cultural heritage. Proposed change: To add reference to the following in Appendix I of the SEA Environmental Report: <b><i>A National Cultural Policy Framework to 2025 (Department of Culture, Communications and Sport, 2020)</i></b>.</li> </ol>
KK-C330-46	Waterford City & County Council	Transport/Zoning	<ol style="list-style-type: none"> <li>1. <b>Additional River crossings:</b> Section 12.6 refers to the downstream river crossing with support for this in the longer term. WCCC requests that reference be made in the associated design framework mapping to the potential routes which will inform a future route selection process, with potential locations and associated maps included in this regard in the Waterford CDP 2022-2028. Inclusion of these maps and associated narrative of the design framework would help to protect future routes and landing points from inappropriate development which could restrict potential future route selection. This is considered to be an important step to support the future preparation of a combined area plan for the city area north of the river in due course.</li> <li>2. <b>Core strategy and mapping:</b> WCCC suggest that adherence to the land use zoning GZT and the associated RGB colour scheme as set out in Appendix B of the Development Plan Guidelines for Planning Authorities DHLGH (June</li> </ol>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1 Section 15.4.3 of the draft LTP deals with the Downstream River Crossing (DRC) including its history in PLUTS, WMATS and the County Development Plans for both Waterford and Kilkenny. The LTP supports a feasibility study to be undertaken over the lifetime of the Plan that considers a suitable location that considers a wide range of issues including impacts on the Lower River Suir SAC, removal of through traffic in Ferrybank and Waterford City, reducing dependency on the Rice Bridge, and multi-modal access to regional drivers such as the Port and University Hospital.</li> </ol> <p>Proposals for a downstream river crossing will be considered in context of national policy including the National Investment Framework for Transport in Ireland (NIFTI), and other factors raised in NTA and TII submissions and</p>

			<p>2022) would assist in providing a consistent approach to mapping and land use zoning across the administrative areas of both Kilkenny and Waterford councils. This would enhance the interpretation and understanding of the combined city metropolitan area land use plans for both local authorities and the general public.</p>	<p>over the course of the development of this LTP. It is recommended that the revised LTP text is incorporated into the draft UFP.</p> <p>2 Noted. The colour palette set out in the zoning maps has been updated in alignment with the Current Local Area Plans set out on MyPlan.ie – the national web map portal for zoning. <sup>2</sup></p>
<p>KK-C330-51</p>	<p>Uisce Éireann</p>	<p>Zoning</p>	<p><b>1. Sustainable Drainage and Green-Blue Infrastructure:</b> Uisce Éireann would be happy to discuss potential opportunities to collaborate on projects that would remove stormwater from combined sewers. In order to maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted. The removal of stormwater from combined sewers as part of roads, public realm, residential or other developments is strongly encouraged; this is particularly relevant to the achievement of compact growth objectives. In addition, and to support sustainable use of the available hydraulic capacity in combined sewers, Uisce Éireann welcomes the provisions in the Proposed Variation which promote SuDS - in particular, Nature-based SuDS. Uisce Éireann is eager to collaborate with others in leveraging circularity opportunities to support the development of a sustainable bioeconomy model and reduce greenhouse gas emissions. In developing the Framework Plan for Ferrybank Belview and associated zonings, consideration should be given to circular economy opportunities. These may include as advanced treatment and re-use of Wastewater</p>	<p>Noted.</p> <p>1. The Kilkenny County Development Plan 2021-2027, Chapter 2 Climate Change provides relevant text in relation to these points, as does the County Kilkenny Climate Action Plan 2024-2024, circular economy under Strategic Goal 5 Sustainability and Resource Management. No amendment required as existing policy will apply.</p> <p>2. Noted. FP to be updated with text in relation to planned road and public realm projects in Chapter 13 Infrastructure at the end of section 13.1. Planned road and public realm projects have the potential to impact on Uisce Éireann assets and projects e.g., tree planting, building over of assets, new connections, requirement to programme upgrade works in advance of road projects. Development in the vicinity of Uisce Éireann assets must be in accordance with our Standard Details and Codes of Practice. Diversion Agreements will be required where an Uisce Éireann asset needs to be diverted or altered. Early engagement in relation to planned road and public realm projects is requested to ensure public water services are</p>

<sup>2</sup> Where practicable, the colour palette set out in the zoning maps has been updated in alignment with the Current Local Area Plans set out on MyPlan.ie – the national web map portal for zoning. Bespoke zoning objectives specific to the Ferrybank Belview area which cannot be directly aligned with a national zoning category/colour scheme are retained

			<p>Treatment Plant (WWTP) effluent to meet the needs of adjacent industry, production of biogas through anaerobic digestion and re-use of water sludge.</p> <p><b>2. Planned Road and Public Realm Projects:</b> Planned road and public realm projects have the potential to impact on Uisce Éireann assets and projects e.g., tree planting, building over of assets, new connections, requirement to programme upgrade works in advance of road projects. Development in the vicinity of Uisce Éireann assets must be in accordance with our Standard Details and Codes of Practice. Diversion Agreements will be required where an Uisce Éireann asset needs to be diverted or altered. Early engagement in relation to planned road and public realm projects is requested to ensure public water services are protected, enable Uisce Éireann to plan works accordingly and ultimately minimise disruption to the public.</p> <p><b>3. Water Supply:</b> The Ferrybank Belview area is served by the South Kilkenny Water Resource Zone (WRZ). Currently it is envisaged that there is capacity available in the South Kilkenny WRZ to cater for the residential population targets identified in the Kilkenny CDP and in the RSES for the Ferrybank Belview area.</p> <p><b>4. Water Network:</b> Uisce Éireann are currently workshoping a capital investment project to upgrade the mains downstream of Ballinvoher Reservoir that will provide additional capacity in the area north of Ferrybank.</p> <p><b>5. Wastewater Treatment Capacity:</b> The Ferrybank Belview area is served by the Waterford City WWTP which also serves Waterford City. Currently it is envisaged that the Waterford City WWTP has capacity to cater for the residential population targets identified in the Kilkenny CDP and in the RSES for the Ferrybank/Belview area.</p>	<p>protected, enable Uisce Éireann to plan works accordingly and ultimately minimise disruption to the public.</p> <p>3. Noted. FP to be updated with detail water supply and water network in Chapter 13 Infrastructure. Section 13.1.1: Currently it is envisaged that there is capacity available in the South Kilkenny WRZ to cater for the residential population targets identified in the Kilkenny CDP and in the RSES for the Ferrybank Belview area. Uisce Éireann are currently workshoping a capital investment project to upgrade the mains downstream of Ballinvoher Reservoir that will provide additional capacity in the area north of Ferrybank.</p> <p>4. Noted. As above.</p> <p>5. Noted. FP to be updated with detail on wastewater treatment capacity in Chapter 13 Infrastructure, section 13.1.2: <del>Ferrybank / Belview is served by the Waterford City Wastewater Treatment Plant (WWTP) in the townland of Gorteens, Belview. The WWTP serves Waterford City and its environs, including Belview and Slieverue. Currently capacity is available in the WWTP to cater for growth.</del> The Ferrybank Belview area is served by the Waterford City WWTP which also serves Waterford City. Currently it is envisaged that the Waterford City WWTP has capacity to cater for the residential population targets identified in the Kilkenny CDP and in the RSES for the Ferrybank/Belview area.</p> <p>6. Noted. FP to be updated with detail on sewer network in Chapter 13 Infrastructure, section 13.1.2, with text to be inserted after Figure 13-3: <i>Uisce Éireann part funded the Ferrybank WWPS upgrade project, which involved the relocation and upgrading of the Ferrybank WWPS which is</i></p>
--	--	--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

		<p><b>6. Sewer Network:</b> UÉ part funded the Ferrybank WWPS upgrade project, which involved the relocation and upgrading of the Ferrybank WWPS which is sized to cater for growth in the Ferrybank area. The pump station project is almost complete. General: Currently it is envisaged that capacity is available in the wastewater networks in the Ferrybank/Belview area. Local network upgrades would need to be delivered in some areas to provide capacity to individual sites, these can be customer driven/funded in accordance with the requirements of our Connections Charging Policy. Further information on this process is available at: <a href="https://www.water.ie/connections/developer-services/">https://www.water.ie/connections/developer-services/</a>.</p> <p><b>Proposed edits to text</b></p> <table border="1" data-bbox="546 730 1308 1367"> <tr> <td colspan="2" data-bbox="546 730 1308 794">7. Chapter 1: Introduction</td> </tr> <tr> <td data-bbox="546 794 786 1193">8. 1.2 Belmont Road Ross Abbey Masterplan (and other Masterplans referred to in the Framework Plan)</td> <td data-bbox="786 794 1308 1193"> <p>Uisce Éireann supports the preparation of a masterplan for this area and the requirement to include a nature-based solution to the management of rainwater.</p> <p>We consider that there should be a master planning type approach to the delivery of infrastructure for large scale residential development. This would ensure that sequential connections to water supply and wastewater infrastructure could be undertaken in the most efficient manner.</p> </td> </tr> <tr> <td colspan="2" data-bbox="546 1193 1308 1225">9. Chapter 8: Belview Port and Industrial Area</td> </tr> <tr> <td data-bbox="546 1225 786 1305">8.7 Belview Port and Industrial Area Objectives - <b>BPIA5</b></td> <td data-bbox="786 1225 1308 1305">Work in conjunction with <del>Irish Water</del> Uisce Éireann</td> </tr> <tr> <td colspan="2" data-bbox="546 1305 1308 1367">9. Chapter 13: Infrastructure</td> </tr> </table>	7. Chapter 1: Introduction		8. 1.2 Belmont Road Ross Abbey Masterplan (and other Masterplans referred to in the Framework Plan)	<p>Uisce Éireann supports the preparation of a masterplan for this area and the requirement to include a nature-based solution to the management of rainwater.</p> <p>We consider that there should be a master planning type approach to the delivery of infrastructure for large scale residential development. This would ensure that sequential connections to water supply and wastewater infrastructure could be undertaken in the most efficient manner.</p>	9. Chapter 8: Belview Port and Industrial Area		8.7 Belview Port and Industrial Area Objectives - <b>BPIA5</b>	Work in conjunction with <del>Irish Water</del> Uisce Éireann	9. Chapter 13: Infrastructure		<p>sized to cater for growth in the Ferrybank area. The pump station project is almost complete. General: Currently it is envisaged that capacity is available in the wastewater networks in the Ferrybank/Belview area. Local network upgrades would need to be delivered in some areas to provide capacity to individual sites, these can be customer driven/funded in accordance with the requirements of our Connections Charging Policy. Further information on this process is available at: <a href="https://www.water.ie/connections/developer-services/">https://www.water.ie/connections/developer-services/</a></p> <p>8. Noted in relation to comment on Chapter 1 Introduction, section 1.2. No amendment required.</p> <p>9. Chapter 8: Belview Port and Industrial Area, 8.7 Belview Port and Industrial Area Objectives - BPIA5 (now BPIA6)</p> <p>Amendment to text as follows:</p> <p>Work in conjunction with <del>Irish Water</del> <b>Uisce Éireann</b></p> <p>9. Chapter 13: Infrastructure, 13.1.1 Water Supply: Addition of following text, in addition to text included at point 3 above:</p> <p><i>The latest water capacity register for the county was published in August 2025 and is available on the Uisce Éireann website at <a href="http://www.water.ie/connections/developer-services">www.water.ie/connections/developer-services</a>.</i></p> <p>13.1.2 Wastewater</p> <p><i>The latest wastewater capacity register for the county was published in August 2025 and is available on the Uisce Éireann website at <a href="http://www.water.ie/connections/developer-services">www.water.ie/connections/developer-services</a>.</i></p>
7. Chapter 1: Introduction													
8. 1.2 Belmont Road Ross Abbey Masterplan (and other Masterplans referred to in the Framework Plan)	<p>Uisce Éireann supports the preparation of a masterplan for this area and the requirement to include a nature-based solution to the management of rainwater.</p> <p>We consider that there should be a master planning type approach to the delivery of infrastructure for large scale residential development. This would ensure that sequential connections to water supply and wastewater infrastructure could be undertaken in the most efficient manner.</p>												
9. Chapter 8: Belview Port and Industrial Area													
8.7 Belview Port and Industrial Area Objectives - <b>BPIA5</b>	Work in conjunction with <del>Irish Water</del> Uisce Éireann												
9. Chapter 13: Infrastructure													

			<p>13.1.1 Water Supply</p> <p>Currently capacity is available in the WRZ to cater for growth.</p> <p>The latest water capacity register for the county was published in August 2025 and is available on the Uisce Éireann website at <a href="http://www.water.ie/connections/developer-services">www.water.ie/connections/developer-services</a>.</p>	<p>10. Appendix 3</p> <p>SEA Environmental Report Appendix II – NTS – 3.8 Material Assets – Wastewater and Water Supply</p> <p><u>Wastewater</u>: Currently capacity is available in the WWTP to cater for growth.</p> <p>The latest wastewater capacity register for the county was published in August 2025 and is available on the Uisce Éireann website at <a href="http://www.water.ie/connections/developer-services">www.water.ie/connections/developer-services</a>.</p> <p><u>Water</u>: Currently capacity is available in the WRZ to cater for growth. The latest water capacity register for the county was published in August 2025 and is available on the Uisce Éireann website at <a href="http://www.water.ie/connections/developer-services">www.water.ie/connections/developer-services</a>. Proposed Variation text refers to Uisce Éireann and not UE or Irish Water.</p>
			<p>13.1.2 Wastewater</p> <p>Currently capacity is available in the WWTP to cater for growth.</p> <p>The latest wastewater capacity register for the county was published in August 2025 and is available on the Uisce Éireann website at <a href="http://www.water.ie/connections/developer-services">www.water.ie/connections/developer-services</a>.</p>	
			<p>10. Appendix 3 -</p>	
			<p>SEA Environmental Report Appendix II – NTS – 3.8 Material Assets – Wastewater and Water Supply</p> <p>Please see comments above regarding capacity for both Water and Wastewater Capacities.</p>	
			<p>SEA Environmental Report 4.11.8.2 Wastewater and 4.11.8.3 Water Supply</p> <p>Please see comments above regarding capacity for both Water and Wastewater Capacities.</p>	
			<p>11. We would suggest that the Proposed Variation text refer to Uisce Éireann and not UE or Irish Water to avoid any potential confusion.</p>	
KK-C330-68	Land Development Agency	Zoning	<p>1. The LDA supports the Framework Plan’s aims to incorporate consolidation and infill, whereby new residential development will occur sequentially and along with planned transport and other infrastructure within a concentric city approach. The Agency notes and welcomes the fact that while the Framework Plan provides population targets up to 2027, the requirements for social and physical infrastructure and zoning, particularly relating to housing delivery,</p>	<p>Noted. No amendment required.</p>

			look beyond that period. The LDA supports the strategic plan to deliver compact, infrastructure-led development within the Ferrybank Belview Framework Plan which will be of critical importance for ensuring the strategic growth of the wider Waterford MASP area into the future.	
KK-C330-72	Department of Education	Community	<ol style="list-style-type: none"> <li>1. DoE supports expansion of the existing two primary and one post-primary schools to cater for planned population increases and welcomes reservation of a site adjacent to St Mary's Boys School for future school provision. Submission notes envisaged need for an additional potential co-located post primary and primary school.</li> <li>2. Requests amendment of wording in relation to co-location of primary and post primary schools to remove implication that the Department is seeking to have a future primary and post primary located together, while noting that department is open to this type of arrangement.</li> <li>3. Notes that it is not the responsibility of the Department to provide enabling infrastructure for future school provision.</li> <li>4. Notes and welcomes relevant objectives regarding school provision including SO6, C3 and C4, and statement in Appendix 1 that an additional primary school will be located at the future Newrath Neighbourhood Centre which would be developed in conjunction with future residential development at that location.</li> <li>5. The department anticipates that additional Special Education Needs (SEN) provision at both primary and post primary level will be required in the future and may results in schools requiring additional accommodation or space to meet this growing need. The department would welcome explicit support within the plan for the provision of school accommodation for children and young people with special education needs.</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted</li> <li>2. Noted. Text to be changed in section 9.4: This Plan provides justification for additional zoning which could result in a population uplift above that provided for in the County Development Plan. Taking a long-term view of potential expansion for Ferrybank <del>consultations were held with the Department of Education and the need for additional school places has been identified (see zoning map fig 5.4).</del> And Post primary: Extra school capacity could be provided through the extension of existing facilities, where possible. In the context of i potential significant long term population growth materialising beyond the lifetime of this Plan, <del>the DOE has identified the potential</del> <b>there is a need</b> for a further post-primary school. (This would require a site of approximately 4.5ha.) This school should be centrally located, while avoiding generating additional town centre traffic.</li> <li>3. Noted.</li> <li>4. Noted</li> <li>5. Text to be added at the end of section 9.4 <i>The Department of Education anticipates that additional Special Education Needs (SEN) provision at both primary and post primary level will be required in the future and may results in schools requiring additional accommodation or space to meet this growing need. This Plan supports the</i></li> </ol>

				<i>provision of school accommodation for children and young people with special education needs.</i>
KK-C330-73	National Transport Authority	Transport	<p>Recommendations:</p> <ol style="list-style-type: none"> <li>1. To provide a sufficiently robust basis for the delivery of transport measures proposed, the NTA recommends that the presentation of the relationship between the Draft LTP and the Draft Framework Plan should be reviewed, in order to clarify the exact LTP Measures and Objectives that will be incorporated into the Framework Plan, and thus into the CCDP as part of the Variation process. The NTA also recommends that, for the avoidance of doubt, all proposed LTP measures that are intended for delivery should be included in the Framework Plan as specific Objectives.</li> <li>2. The NTA recommends that the wording of Objective RN 9, if it is intended to form part of the CCDP as Varied, would require further consideration in order to ensure its alignment with the provisions of national policy. In this regard, explicit reference to NIFTI, and in particular to the two Hierarchies, should be included in the amended Objective.</li> <li>3. The NTA recommends that the wording of Objectives BUV3 and RAN2 should be revised to remove references to roundabouts and should refer more generally to the reconfiguration or redesign of the junctions.</li> <li>4. The NTA recommends that Objective MAT9 should be expanded to include reference to bus layover and terminus facilities, in addition to the provisions related to bus stops.</li> <li>5. The NTA recommends that Objective MAT16 should be revised to refer to the NTA's Park &amp; Ride Development Office, and should be presented at a more general level, i.e., should not be bound solely to the two locations mentioned in the draft Objective.</li> </ol>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1. Agreed. All relevant LTP measures will be included in Chapter 12 Movement and Active Travel it is the aspiration of this Plan to deliver all movement and active travel objectives as resources and funding allow.</li> <li>2. Agreed. RN9 and supporting text will include reference to NIFTI and Hierarchies as suggested.</li> <li>3. Noted. Changes to be made to Table 5-6 Development Objectives to address submission and to ensure consistency between Table 5-6 and section 6.5: <b>BUV3 Reconfigure the junction of Aldi to optimise the safe and direct movement of pedestrians and cyclists through these junctions, whilst also balancing the needs of all road users.</b> Addition of: <b>BUV4 Reconfigure the Ferrybank Primary Care Centre/shopping centre junction to optimise the safe and direct movement of pedestrians and cyclists through these junctions, whilst also balancing the needs of all road users.</b> <b>RAN32</b> Redesign the junction on Abbey Road, the <b>junction</b> at Tesco, to optimise the safe and direct movement of pedestrians and cyclists through these junctions, whilst also balancing the needs of all road users.</li> </ol>

			<p>6. The NTA recommends that Development Management Standard MAT-DM2 should be amended to refer primarily to Mobility Management Plans, and then to Workplace Travel Plans and School Travel Plans as required.</p>	<p>Section 6.5</p> <p>BUV3 Reconfigure <del>the roundabout at</del> the junction of Aldi to optimise the safe and direct movement of pedestrians and cyclists through these junctions, whilst also balancing the needs of all road users.</p> <p>BUV4 Reconfigure the Ferrybank Primary Care Centre/shopping centre junction to optimise the safe and direct movement of pedestrians and cyclists through these junctions, whilst also balancing the needs of all road users.</p> <p>RAN2 Redesign the junction on Abbey Road, the junction at Tesco, to optimise the safe and direct movement of pedestrians and cyclists through these junctions, whilst also balancing the needs of all road users.</p> <p>4. Noted and agreed. MAT21 to be amended to: The provision of additional bus stops, <b>bus layover and terminus facilities</b> at high-demand locations.</p> <p>5. Noted and agreed.</p> <p>MAT36 (PM3) KCC will collaborate with the NTA's <b>Park &amp; Ride Development Office</b> and TH to consider the feasibility of dedicated Park and Ride Facilities.</p> <p>6. Noted and agreed. Section 12.11: MAT-DM2 Require <b>Mobility Management Plans</b>, Workplace Travel Plans <b>and School Travel Plans as required</b>, using a collaborative / area-based approach for new schools, workplaces and other key locations within the plan area.</p>
--	--	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------



## 2.2 Section B: Other Submissions

Sub No.	From	Main Themes	Submission Summary	Chief Executive's Response & Recommendation
KK-C330-1	Aine O'Driscoll	Transport	<ol style="list-style-type: none"> <li>1. The proposal to set Abbey Road at 30km/h is considered unworkable and unnecessary, as no other location in Waterford uses this limit—50km/h should suffice.</li> <li>2. Improving pedestrian safety should be prioritised, with upgrades to footpaths on both sides and better entrance design, especially at Greenlea Lane, which has visibility and safety challenges.</li> <li>3. Physical traffic-calming measures, such as speed bumps or rumble strips, are recommended to slow vehicles on dangerous bends, since signage and speed limits alone are not effective.</li> </ol>	<p>Noted.</p> <p>1-3: Speed Limits, Traffic-calming and Footpath Provision</p> <p>Speed limits and site-specific safety improvements. will be for the consideration of KCC. The Abbey Road is home to a number of schools and community services, and as such the LTP has suggested both traffic-calming measures, reduced speed limit and enhanced footpath provision, crossings etc.</p> <p>It is considered that the proposed safety improvements in the LTP are consistent road safety objectives and national, regional and local policy, including the Design Manual for Urban Roads &amp; Streets (DMURS).</p>
KK-C330-2	Gary Mentanko	Economic Development	<ol style="list-style-type: none"> <li>1. <b>(A1) Flooding issues around IDA Site:</b> Increasing the local permeability of Ferrybank/Belview and developing the BETP sites must take into consideration significant challenges regarding local flooding especially in the Ballyvalla/Kilmurry areas. Key issues are (A) Flooding issues around the IDA site, and (B) IDA separation from the road and (C) water consumption of site. Submission makes 5 points in relation to A and 1 point in relation to B and C. Highlights concern that development on the Plot E-A site would increase local run-off</li> </ol>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1 Any development of this site would need to comply with relevant Development Plan and Framework Plan provisions, including those relating to drainage and flood risk management, as appropriate.</li> <li>2 Various provisions have been integrated into the Development Plan and associated Draft Framework Plan with which any new development, including that related to the sites mentioned in the submission, will need to comply as appropriate. This includes provisions relating to project level drainage and flood risk</li> </ol>

			<p>and flooding. Development Management Requirements as part of Integration of flood risk management provisions into the Kilkenny City and County Development Plan (10.2.8) must be adhered to on any development planned here.</p> <p>2. <b>(A2) Flooding Risk Adjacent to Plot E-A:</b> submission highlights risk of flooding for two properties at Ballyvalla (Eircode X91 W8X4 and X91 C6Y6). Seeks an examination of the Willow Carr/ detention basin along the N29 before there are any new infrastructure projects carried out such as the proposed lorry car park at the Slieverue Roundabout. This to examine whether the current state of the Willow Carr increases the flooding likelihood along the stream and whether additional development would increase the runoff.</p> <p>3. <b>A3 Stream capacity adjacent to E-A:</b> Submission notes Kilkenny CoCo has recently demolished and repaired a bridge on Local Secondary Road LS7476 in response to flooding concerns. A farming access point some 400m below this bridge has been culverted, a narrow 65cm pipe, which leads into the IDA site in E-A. Any plan for development in E-A needs to reduce the chance that this pipe will block or break its banks by daylighting or increasing the stream capacity. Submission notes that planning permission for this culvert cannot be found, or that it complies with the OPW's Catchment Flood Risk Assessment and Management.</p> <p>4. <b>A4 Flood Estimates vs. Actuality:</b> Submission indicates that the site assessment for employment sites E-A to E-J which</p>	<p>assessment. INF-DM1 from the Proposed Variation requires that where flood risk may be an issue for any proposed development, including pluvial flood risk, a flood risk assessment shall be carried out that is appropriate to the scale and nature of the development and the risks arising. This shall be undertaken in accordance with the Flood Risk Assessment Guidelines, including the sequential approach. Proposals for mitigation and management of flood risk will only be considered where avoidance is not possible and where development can be clearly justified with the Guidelines' Justification Test. An examination of wider catchment related issues would need to inform compliance with these requirements. No change proposed.</p> <p>3 Refer to response provided under 2 above. The works to the culvert were carried out in accordance with relevant provisions of the Local Government Act 1993 and the Roads Act, 1993 which allows Local Authorities to carry out construction, maintenance and improvements works to bridges and culverts, as may be necessary and to ensure optimal functioning of same and for flood relief and protection etc.</p> <p>4 . As identified in the SFRA and under Section 5.7 <i>"Land Use Zones - Overriding Flood Risk-related Limitation on the above Land Use Zones"</i>, <i>"There are a number of instances where Flood Risk Zones A and B overlap with a variety of the above land-use zoning objectives, including Open Space and Water Compatible Development. Uses under all zoning objectives shall be limited to water compatible uses in Flood Zone A, and less vulnerable or</i></p>
--	--	--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<p>states in is stated that site E-A as being category 1, the lowest score for likely flooding, is incorrect, as the stream is categorised as being in Flood Zone A which is deemed by in the Flood Guidance to being a high probability of flooding.</p> <p>5. <b>A5 Permeability Issues:</b> The laneway adjacent to the submitter’s property is proposed to be a permeability access point to the Greenway however, there is concern as this lane floods to a depth of up to 40cm several times throughout the winter. Flooding issues should be examined in winter months as well as how the two streams have been arranged nearer to the rail bridge before considering opening this to permeability.</p> <p>6. <b>B IDA Separation from road:</b> Submission notes point 8.8 which lists a requirement of a woodland planting buffer of 15 to 20m to be put in place. Submission queries whether a requirement to include a berm can be included and expresses concern that tree planting would be undertaken by the IDA, as a meeting with them in 2021 indicates that they had not yet planted the entire requirement of trees put forth in their planning permission for Tirlan despite it being more than a decade since permission was given.</p> <p>7. <b>C Water consumption of site:</b> the planned IDA area E-A sits within an area designated as having a High designation of groundwater vulnerability, a vein which runs under 5 residential properties. Any development on this site in Ballyvalla will require an analysis of the possible effect of</p>	<p><i>water compatible uses in Flood Zone B. Detailed, site specific Flood Risk Assessment will be required in these areas. This limitation shall take primacy over any other provision relating to these land use zoning objectives.”. SFRA will updates to add this area to the Justification Test table set out in the SFRA Report at Table 6.</i></p> <p>5 Refer to response provided under 2 above. Noted. At present the permeability link in question is only an indicative high-level proposal within the LTP. Each proposal will go through its own separate feasibility assessment process should that proposal be carried forward to dedicated planning and design stages in future. Site-specific flooding assessments can be undertaken at that point. It is likewise envisaged that each individual proposal will undergo its own public consultation process at that time.</p> <p>6 Noted. Additional text added to end of Section 8.8 as follows: <i>‘Applications for development will be assessed on a case by case basis with respect to landscaping principles’.</i></p> <p>7 As detailed under Section 13.1, “Applications for development under the Plan shall not adversely affect a water body’s ability to meet its objectives under the Water Framework Directive, individually as a result of the proposed development or cumulatively, in combination with other developments.” The objective of the Water Framework Directive encompasses good quantitative status relating to groundwater resources. No change proposed.</p>
--	--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			drawing available groundwater in the area. (fig 4.12 of Groundwater Vulnerability).	
KK-C330-3	John Breen	Zoning	<p>1. <b>Submission relates to request to reroute proposed footpath and cycle route Objective MAT3, that is currently proposed to run east west to the north of woodland adjacent to Mountain View House.</b> Requests that proposed footpath and cycle path route be realigned southwards along Rockshire Road onto the recently completed Arbour mount estate and, thereafter, reconnect to the WCW3 (now MAT3) route east of the wooded knock. This alternative route would be under the control of the Council as a public road with street lighting along most of its length, and it would avoid the wooded knock and the trees and habitats it supports.</p> <p>2. <b>Submission opposed to the inclusion of Mountain View House and garden/ paddock and the fields to the north and east being included in the Residential Strategic Reserve and Passive Open Space zonings</b> and requests Agricultural zoning for this land.</p>	<p>Noted.</p> <p><b>1 MAT3 Re-alignment:</b> Noted. At present the alignment in question is only an indicative high-level proposal within the LTP. Each proposal will go through its own separate feasibility assessment process should that proposal be carried forward to dedicated planning and design stages in future. It is likewise envisaged that each individual proposal will undergo its own public consultation process at that time.</p> <p><b>2 Zoning:</b> Lands in this area have been zoned in accordance with the strategic approach for a concentric city neighbourhood approach. This indicates the potential for a future neighbourhood in this area, with associated lands zone for strategic reserve. The topography of the area is noted, and the draft Framework Plan will seek to protect the Rockshire ridgeline from development as per Objective HE5 <i>‘Protect the Rockshire ridgeline from development to retain the rural character of the area.</i></p>
KK-C330-4	David Halpin	Biodiversity	<p>1. <b>Advocates for Habitat Code WN5 zoning for specific riparian woodland site,</b> adjacent to Store All complex on the west side of the N29 to the north of Belview Port.</p>	<p>Noted.</p> <p>This submission refers to the 2017 Local Area Plan.</p> <p>“WN5” is mentioned in the Draft Framework Plan as follows:</p>

				<p>A. "HE1 Protect the sites identified on Figure 10.1 Natural, Built Heritage and Archaeological Designations as sites of local conservation interest. These are:</p> <ul style="list-style-type: none"> <li>• Wet Grassland (GS4)</li> <li>• Reed swamp (FS1)</li> <li>• Oak-Ash-Hazel woodland (WN2)</li> <li>• Riparian Woodland (WN5)</li> <li>• Mixed Broadleaved Woodland (WD1)"</li> </ul> <p>And</p> <p>B. "Seven woodland sites are in the Plan study area Two of these were sites of Oak-Ash-Hazel woodland, habitat code WN2. They have an unusually low proportion of non-native species and well-formed canopies. The two sites are located in Mullinabro and Cloone, and are connected by a small stream, which adds diversity. The site at Mullinabro was identified as part of the NSNW, see above. Four of these woodland sites were identified as Riparian Woodland, habitat code WN5. These sites are all located in the east of the Plan area, in the Belview Industrial area. One of these sites was identified as Mixed Broadleaved Woodland, WD1, located near the SAC in Belview. All seven of these sites continue to be zoned for Passive Open Space/Biodiversity conservation.</p> <p>The Kilkenny CDP, objective 9A set out the requirements in relation to these sites.</p> <p>Objective 9A Continue to identify and map habitats and green infrastructure of county importance and raise awareness and</p>
--	--	--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

				<p>understanding of the county’s natural heritage and biodiversity identifying green corridors and measures to connect them.”</p> <p>Figure 10.1 shows “Natural, Built Heritage and Archaeological Designations” from the Draft Framework Plan shows the following:</p> <ul style="list-style-type: none"> <li>• Areas Likely to Contain Annex I Habitats</li> <li>• County Geological Sites</li> <li>• Proposed Natural Heritage Areas</li> <li>• Special Areas of Conservation</li> <li>• Tree Preservation Orders</li> </ul> <p>No amendment required.</p>
KK-C330-6	Ferrybank Development Partnership	Zoning	<ol style="list-style-type: none"> <li>1. <b>Residential zoning sought for lands owned by Ferrybank Development Partnership at Christendom, Ferrybank, County Kilkenny.</b> From the servicing, accessibility and proximity to centre perspective, the land is sequentially superior to all of the other proposed Strategic Reserve lands in the Framework Plan area. Submission notes national housing growth requirements identified in the Revised National Planning Framework for implementation through development plans. Indicating that this will mean significantly increased quantum of residential zoned land in the Ferrybank area.</li> <li>2. The Belmont Road/ Ross Abbey Masterplan Draft contained in the Framework Plan, has Parcel A of these lands identified as a woodland and Parcel B as part of a green space designation,</li> </ol>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1. KCC support this request which aligns with the requirement to zone additional residential lands in response to the Section 28 Guidelines on Revised NPF Implementation and new housing growth requirements: Site A to be changed to new residential zoning.</li> <li>2. KCC support this request. Shading for specified lands in Belmont Road/ Ross Abbey Masterplan Draft to be revised to Core Blocks.</li> </ol>

			both of which are incorrect. It is requested this is acknowledged and confirmed that the error will be corrected in the amended Draft and Final Plan.	
KK-C330-7	Sheila Scanlon	Newrath Road Facilities	<p>Urges the following for the Newrath Road area:</p> <ul style="list-style-type: none"> <li>• Installing sewerage systems for public health.</li> <li>• Providing E-fibre broadband to bridge connectivity gaps along Newrath Road.</li> <li>• Establishing a reliable bus service to Waterford City via Newrath Road.</li> <li>• Creating safe cycle lanes to promote sustainable travel.</li> <li>• Installing a roundabout and speed calming measures for road safety.</li> <li>• Adding protective barriers at Newrath Roundabout for pedestrian safety.</li> <li>• Implementing speed controls on the dual carriageway.</li> <li>• Improving street lighting for visibility and safety.</li> </ul>	<p>Noted.</p> <p>Infrastructure, transport and connectivity in the Newrath Road area will be provided in the next plan period in the strategic context of this area becoming a future city neighbourhood. Foul water, drainage are matters for Uisce Eireann and it is envisaged this will be provided in tandem with future development.</p>
KK-C330-10	Caroline Power	Transport	<p>1 Objects to a walkway from Belfield to Fiodh Mor. Unsocial behaviour highlighted with the cause believed to be the bridge.</p>	<p>1 Noted. The intention of the link is to provide additional sustainable access to necessary local services including shopping, schools and community uses. There is a need to address perceived and real causes of ASB at locations within the vicinity of the SE Greenway. It is noted that the bridge is already in use by residents but that additional improvements to lighting and surveillance (CCTV) will be</p>

				<p>considered as is the case for other similar schemes throughout Ireland. KKC Parks Section is proactively engaging the provision of CCTV to increase safety and security in this area. Additional fencing has been provided along the bridge. Lighting and upgrading of this link have been put forward as one of the active travel proposals for 2026, however this is subject to national funding. The opening of the SE Greenway will see an increase in passive surveillance and activity, and it is expected that additional safety improvements will be proposed as part of a separate appraisal process. Propose to include a new objective in the draft Framework Plan <i>'KKC Active travel team/ Area Office to develop proposals to improve safety along the permeable link from Bellfield to Fiodh Mor.</i></p>
KK-C330-12	Suir Shipping	Zoning	<ol style="list-style-type: none"> <li>1. Submission relates specifically to “the aspiration for a mooted long-term development of an undefined amenity park, possibly including the Knockmullen House and grounds to be incorporated into the mooted ‘Glass House Park’”.</li> <li>2. There is a clear conflict between the zoning map, its associated legend and land use matrix and Objective BPIA3, with its associated justification and implementation recommendations contained in section 14.2 Implementation.</li> <li>3. The aspirational positioning of a passive recreation park in the core of a busy, expanding National Port conflicts with other policies and objectives of Government National Ports and Climate Action policy (multi-ports including Belview to serve the ORE targets for renewable energy), the SA RSES,</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted</li> <li>2. It is accepted that the zoning map with the 2017 zoning for this site of Residential Amenity Belview carried forward to the 2025 draft plan. It is recommended to change to PFI zoning subject site specific objective ( see 6 below).</li> <li>3. <u>Biodiversity</u> At a national level the 4th National Biodiversity Action Plan, Outcome 3C, Action 3C1 states “All Public Authorities and private sector bodies move towards no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure”. Zoning changed to PFI with site specific bio-diversity objective ( see 6 below)</li> </ol> <p><u>Built Heritage</u></p>

			<p>Waterford MASP, National Roads Guidelines, Kilkenny County Development Plan support for the expansion of Belview Port and the anticipated employment concentration there.</p> <p>4. Policy within the Variation document regarding the public parks is that a network of interconnected public parks is being developed. The Glasshouse Park is isolated and cannot be interconnected with a network of parks.</p> <p>5. To remove the conflict inherent in the draft Framework Plan and Variation 6, the specific local objective BPIA3 relating to a 'mooted' Glass House Park and the associated script and section 14.2 Implementation and implementation recommendations should be entirely deleted.</p>	<p>The Glass House is a protected in the 2021 Kilkenny County Council Record of Protect Structures.</p> <p>The assessment of the Glasshouse undertaken for the draft FBFP (see Appendix 1 Part 6) indicates possible future uses as 'Preserved ruin. The PFI zoning Is introduced with site specific objective for biodiversity and protection of built heritage.</p> <p>4. <u>Port of Waterford Masterplan</u></p> <p>The Port of Waterford Masterplan includes a table of Masterplan Environmental Mitigation Measures (p96). Action 24 Cultural Heritage states: "Maintenance of a strict buffer around the Glass House, Mill and Bellevue House. No works will be undertaken within this buffer. Sensitive construction measures will be employed during all works".</p> <p><u>Policy and Zoning</u></p> <p>With regards to the importance of Belview Port, the draft Ferrybank/Belview Framework Plan clearly highlights the importance of Belview Port to the local and regional economy and of the potential for the development of ORE/offshore renewable energy facilities at this location. However, given the scale of potential development lands that have been zoned for PFI purposes, and the need to protect cultural heritage and biodiversity, intensive industrial use is not considered appropriate at this location.</p> <p>5. Recommendation:</p> <p><b>Amend draft zoning map</b> to change zoning from Residential Amenity Belview to Port Facilities and Industry (PFI).</p>
--	--	--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

				<p>Amend Table 5-6 text for BPIA3 to <b>“Permit appropriate uses on the site of Glasshouse and Knockmullan Gardens subject to the retention of the features of the garden, the integration of the proposal with its character and the adoption of a woodland management plan. ( amend table 8.7 to reflect the above)</b></p> <p>Addition of the following text to Port Facilities and Amenity (PFI) zoning description in section 8.6 (p61):  <i>Development Objective BPIA 3 in relation to Knockmullan House and the Glasshouse is to be considered in any future development proposals within the lifetime of the Plan.</i></p> <p>Delete the following text from the Passive Open Space zoning description in section 8.6 (p62): <del>“The Glasshouse, an early 18th century house, was occupied until the early 1990s. It is now a severely degraded ruin. It is appropriate that the ruin be conserved, and an associated park be created for use by workers and locals”.</del></p>
KK-C330-13	Michael Doyle	Zoning	1. Submission concerns a portion of client’s lands to the north-west corner of the site, facing onto Belmont Road (R711) at the	1. Noted.

			<p>roundabout junction with Clover Avenue which is zoned neighbourhood centre. Submission indicates that the extent of 0.5ha is inadequate and that a zoning of at least 1.4ha is required to achieve the objectives of the LAP and to deliver a functional and sustainable Neighbourhood Centre. Key issue is that the topography (sloping site) will sterilise part of the site due to retaining walls; access will be required from further from the junction; significant parking will be required; site of 0.4ha cannot accommodate buildings of 3-4 storeys as indicated; critical mass of land required to provide a viable neighbourhood centre. A site constrained to 0.5ha considering the topography and other constraints outlined above is unlikely to attract investment or tenants, given the practical design, parking and servicing issues. A 1.4ha zoning would ensure commercial viability, long-term sustainability and alignment with LAP retail and urban design policies.</p> <p>2. Requests that the plan be amended to provide for an enlarged Neighbourhood Centre zoning of 1.4ha at the Belmont Road / Clover Avenue roundabout corner of client's Abbeylands lands.</p>	<p>2. Zoning to be amended to provide for an enlarged Neighbourhood Centre zoning of 1.4ha at the Belmont Road / Clover Avenue roundabout corner.</p>
KK-C330-16	Gyles Quay Residents Group	Zoning	<p>1. Concerns about industrial expansion towards Gyles Quay and surrounding areas. Land zoned on the port road should be prioritised for development before development of land near Gyles Quay residential area.</p>	<p>Noted.</p> <p>1 Zoning for lands owned by the IDA, in proximity to Gyles Quay have been zoned for BETP which excludes industrial use. Future development will be required to include berms and a planted buffer zone. Lands on the Port Road are zoned for PFI zoning which includes industrial use. Given the lands are in private ownership the phasing of lands being brought forward for development is</p>

				outside of the control of the planning authority. No amendment required.
KK-C330-17	Maire and Paul Roche	Community	<ol style="list-style-type: none"> <li>1. Expresses concern over impact of Waterford Port Company on local area and on residential amenity.</li> <li>2. Seeks buffers to zoning through berms and native deciduous trees.</li> <li>3. Seeks provision of pathways to the old road leading to Kennedy's Mill from Marine Point.</li> <li>4. Seeks looped woodland walk through Belview Woods from the Glanbia/ Tirlán roundabout towards the river as an amenity for workers and locals. Concern that this area was fenced off in recent years with security fencing without any discussion with local residents.</li> <li>5. Seeks small amenity area/ park/ viewing area over the river located at waste area of ground to the left of the lower end of Glasshouse Road</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted.</li> <li>2. A requirement for buffers has been including in the Framework Plan under zoning requirements for 'Residential Amenity Belview', and within Chapter 8 Belview Port and Industrial Area'. Further detail on landscape buffers is included under Belview Industrial Area Development Management Standards, which requires a woodland planting buffer of 15-20 metres. No amendment required.</li> <li>3. Access for the public to the Belview Port area must be balanced with the requirements of a working port area, including significant HGV traffic. Suir Riverside Blueway. Objective MAT18 (PG4) states: "KCC will work with relevant stakeholders including the Port of Waterford, Irish Rail, the IDA, TII and the NTA, to support the provision of a greenway route connecting the Active Travel Bridge and Belview Port." No amendment required.</li> <li>5. The proposed use is not considered compatible with the areas function as a port. No amendment required.</li> </ol>
KK-C330-18	Robert Murphy/Peter Thomson	Zoning	<ol style="list-style-type: none"> <li>1. Request to retain previous Existing Residential zoning for row of houses at Grannagh.</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted and agreed. Zoning for this site will be changed to Existing Residential.</li> </ol>
KK-C330-20	James Robinson	Community	<ol style="list-style-type: none"> <li>1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will</li> </ol>

			<p>pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.</p>	<p>work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b></p>
KK-C330-21	Damien Donoghue	Zoning	<ol style="list-style-type: none"> <li>1. Objects to a walkway from Belfield to Fiodh Mor. Unsocial behaviour highlighted with the cause believed to be the bridge.</li> <li>2. Concerns around that opening of Ferrybank Shopping Centre will cause congestion at adjacent roundabout for nearby residents.</li> <li>3. Seeks a set down area for St Mary's Boys NS outside the shopping centre and bus stop at Walsh's garage.</li> </ol>	<ol style="list-style-type: none"> <li>2 Noted. The intention of the link is to provide additional sustainable access to necessary local services including shopping, schools and community uses. There is a need to address perceived and real causes of ASB at locations within the vicinity of the SE Greenway. It is noted that the bridge is already in use by residents but that additional improvements to lighting and surveillance (CCTV) will be considered as is the case for other similar schemes throughout Ireland. KKC Parks Section is proactively engaging the provision of CCTV to increase safety and security in this area. Additional fencing has been provided along the bridge. Lighting and upgrading of this link have been put forward as one of the active travel proposals for 2026, however this is subject to national funding. The opening of the SE Greenway will see an increase in passive surveillance and activity, and it is expected that additional safety improvements will be proposed as part of a separate appraisal process. Propose to include a new objective in the draft Framework Plan 'KKC Active</li> </ol>

				<p><i>travel team/ Area Office to develop proposals to improve safety along the permeable link from Bellfield to Fiodh Mor’.</i></p> <p>At present the link in question is only an indicative high-level proposal within the LTP. Each proposal will go through its own separate feasibility assessment process should that proposal be carried forward to dedicated planning and design stages in future. It is likewise envisaged that each individual proposal will undergo its own public consultation process at that time.</p> <p>It should also be noted that in the case of delivering permeability links such as the one indicated, works would typically incorporate safety-enhancement measures including but not limited to lighting and surveillance measures.</p> <p>2. Noted; KCC will assess and mitigate manage potential congestion impacts as a result of the planned opening of the District Centre through the development management process. No amendment required.</p> <p>3. Noted. The final Plans will identify a requirement to include St Mary’s NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary’s NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan’s ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to</b></p>
--	--	--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

				<b>review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b>
KK-C330-22	Sharon Keogh	Transport	1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.	1. Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b>
KK-C330-23	Robert Byrne	Transport	1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.	1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b>

KK-C330-24	Justina Zemaityte	Transport	<p>1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.</p>	<p>1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b></p>
KK-C330-25	Kevin Kehoe	Transport	<p>1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.</p>	<p>1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b></p>
KK-C330-26	David Clarke	Transport	<p>1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road,</p>	<p>1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will</p>

			Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.	work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b>
KK-C330-27	Ting Hu	Transport	1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.	1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b>
KK-C330-28	Michael Dunphy	Transport	1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking.	1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction

			Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.	with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b>
KK-C330-29	Linda Hayes	Transport	1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.	1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b>
KK-C330-30	Mary and Eamonn Cunningham	Transport	1. Objects to a walkway from Belfield to Fiodh Mor. Unsocial behaviour highlighted, with the cause believed to be the bridge. Concern that a greenway access at this location will bring increased parking in the Bellfield / Fiodh Mor area particularly at the back of both estates where it is close to the proposed access. This will bring increased traffic into Bellfield which will cause a danger to young children playing outside.	1. Noted. The intention of the link is to provide additional sustainable access to necessary local services including shopping, schools and community uses. There is a need to address perceived and real causes of ASB at locations within the vicinity of the SE Greenway. It is noted that the bridge is already in use by residents but that additional improvements to lighting and surveillance (CCTV) will be considered as is the case for other similar schemes throughout Ireland. KCC Parks Section is proactively engaging the provision of

			<p>Query how access of electric scooters, scramblers and motorbikes would be prohibited.</p> <p>2. The indicative masterplan of lands between Belmont Road and Abbey Road [Fig 6-13] indicates access through the large green space in Bellfield. This is used by residents for activities, walking dogs and by children. Concern that permeability access will facilitate anti-social behaviour at this location. Questions need for cycle access at this location given North-South road is designed to take cyclists to the greenway and associated car park.</p> <p>3. Plans to redevelop Belmont Road and prioritise active travel by narrowing the road are envisaged to cause traffic tailbacks.</p>	<p>CCTV to increase safety and security in this area. Additional fencing has been provided along the bridge. Lighting and upgrading of this link have been put forward as one of the active travel proposals for 2026, however this is subject to national funding. The opening of the SE Greenway will see an increase in passive surveillance and activity, and it is expected that additional safety improvements will be proposed as part of a separate appraisal process. Propose to include a new objective in the draft Framework Plan '<i>KKC Active travel team/ Area Office to develop proposals to improve safety along the permeable link from Bellfield to Fiodh Mor</i>'.</p> <p>Each proposal will go through its own separate feasibility assessment process should that proposal be carried forward to dedicated planning and design stages in future. It is likewise envisaged that each individual proposal will undergo its own public consultation process at that time.</p> <p>It should also be noted that in the case of delivering permeability links such as the one indicated, works would typically incorporate safety-enhancement measures including but not limited to lighting and surveillance measures. No amendment required.</p> <p>2. Noted; please refer to above response (Point 1).</p> <p>3. The Plan identifies a series of measures to reduce through traffic volumes in the heart of the Belmont Road area including modal</p>
--	--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

				<p>shift to active travel, public transport and the Ferrybank Relief Road. It is considered that the objectives of the Plan (s) are consistent with national, regional and local policy. No amendment required.</p>
KK-C330-31	SLR Consulting Ireland	Zoning	<p>This submission concerns a previously developed industrial and now unused brownfield site located near the Milepost Infill Zone and Slieverue Village and within the Waterford Metropolitan Area. Its current 'zoning' for agriculture use does not reflect its current status or potential. It is requested that the planning authority:</p> <ol style="list-style-type: none"> <li>1. Include a general policy in the Framework Plan which is supportive of the re use of brownfield land within the development boundary of the Framework Plan, particularly where this land is in close proximity to existing settlements and tourism and employment generating uses.</li> <li>2. Give consideration to the site as a strategic brownfield Opportunity area, potentially included in the Milepost Infill Zone as a part of the Framework Plan.</li> </ol>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1. This site is outside of the current development boundary of Slieverue Village and for that reason is not considered appropriate for residential development at this time given the precedent this would set. No change.</li> </ol>
KK-C330-32	Aine Ryan Consulting, for Sean & Tidi Phelan	Zoning	<ol style="list-style-type: none"> <li>1. Advocates for zoning amendment for lands associated with current uses of 5.31ha Tail Blazers dog walking park at Newrath from proposed passive open space to active open space to facilitate this use. Indicates that this would deliver additional active recreational amenities in a scenic location with the spatial context of adjoining (zoned active recreational land uses (including Waterford Golf Club).</li> <li>2. Seeks inclusion of additional text at 9.5: <i>Section 9.5 Open Space and Recreational Facilities</i></li> </ol>	<p>Noted. Proposed passive open space zoning is considered appropriate and is to be retained. The range of uses listed as 'open for consideration' is to be expanded to include 'outdoor dog park/exercise facility'.</p>

			<p><i>Active Open Space uses which are open for consideration include outdoor dog park/exercise facility. The Planning Authority will support the establishment of a dog park and associated facilities in Newrath to expand the variety of active recreation facilities for the Plan area, providing that development respects the established area character. As such, any application must demonstrate that it can be accommodated within and respect the established character and residential amenities of the area.</i></p> <p><a href="#">Tailblazers Dog Park - v2 - YouTube</a></p>	
KK-C330-33	Christine Ennis	Transport	<p>1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.</p>	<p>1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b></p>
KK-C330-34	Niamh Dunphy	Transport	<p>1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings,</p>	<p>1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will</p>

			<p>children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.</p>	<p>include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan’s ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b></p>
KK-C330-35	Damien Territt	Transport	<ol style="list-style-type: none"> <li>1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.</li> </ol>	<ol style="list-style-type: none"> <li>1 Noted. The final Plans will identify a requirement to include St Mary’s NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary’s NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan’s ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b></li> </ol>
KK-C330-36	Claire Ryan	Transport	<ol style="list-style-type: none"> <li>1. Expresses concern that there was a lack of engagement in the plan development process.</li> <li>2. Objects to a walkway from Belfield to Fiodh Mor. Unsocial behaviour highlighted, with the cause believed to be the bridge. Concern that a greenway access at this location will bring increased parking in the Bellfield / Fiodh Mor area</li> </ol>	<ol style="list-style-type: none"> <li>1 Opportunity was provided to engage in the plan development at pre-draft stage and at draft stage including placing plans on the Kilkenny County Council Consultation Portal, invitation of submission and public drop in workshops which were well publicised and notified to local community groups. The draft LTP includes issues raised from the Issues Paper, consultation with a</li> </ol>

			<p>particularly at the back of both estates where it is close to the proposed access.</p> <p>3. Concern about potential safety issues for users of the Greenway in the vicinity of the bridge due to anti-social behaviour and objects being thrown from the bridge/fires etc.</p> <p>4. Concern that changes to Belmont road will add to traffic congestion in the absence of an effective public transport system.</p> <p>5. Concern that proposed access point to the Greenway at Bellfield/Fiodh Mor does not reflect commitment of the Council during 2021 engagement to ensure that it would not be possible to access the Greenway other than from the designated Greenway parking site. This was to avoid unauthorised access by people driving to Fiodh Mor/Bellfield and parking their cars outside homes for prolonged periods causing congestion, blocking residents into their homes and causing a hazard to local children playing outside their homes.</p>	<p>wide range of stakeholders. The final Plan will consider issues raised as part of this consultation process.</p> <p>2 The intention of the link is to provide additional sustainable access to necessary local services including shopping, schools and community uses. There is a need to address perceived and real causes of ASB at locations within the vicinity of the SE Greenway. It is noted that the bridge is already in use by residents but that additional improvements to lighting and surveillance (CCTV) will be considered as is the case for other similar schemes throughout Ireland. KKC Parks Section is proactively engaging the provision of CCTV to increase safety and security in this area. Additional fencing has been provided along the bridge. Lighting and upgrading of this link have been put forward as one of the active travel proposals for 2026, however this is subject to national funding. The opening of the SE Greenway will see an increase in passive surveillance and activity, and it is expected that additional safety improvements will be proposed as part of a separate appraisal process. Propose to include a new objective in the draft Framework Plan <i>'KKC Active travel team/ Area Office to develop proposals to improve safety along the permeable link from Bellfield to Fiodh Mor'</i>.</p> <p>It is further noted that there is a dedicated car park for the Greenway being developed by KCC at Clover Meadows. KCC will monitor parking arrangements once the Greenway is opened and consider the need for additional measures if necessary, at that point.</p>
--	--	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

				<p>3 See response to point 2 above. It is noted that the bridge is already in use by residents but that additional improvements to lighting and surveillance will be required as is the case for other similar schemes throughout Ireland.</p> <p>4 The Plan (s) proposed significant opportunities for mode shift including the significant investment in public transport including the dedicated public transport interchange at Ferrybank and BusConnects Waterford. It is considered that additional measures in this Report significantly enhance accessibility to commit public transport including permeability links and safer pedestrian/cycle access.</p> <p>5 In order to increase permeability, there may be additional access points onto the Greenway. In such an event, KCC will monitor parking arrangements and consider the need for additional measures to safeguard against unauthorised parking and disruption to residents at Bellfield/Fiodh Mor.</p>
KK-C330-37	Patricia Kiely	Transport	<p>1. Advocates for no new permeability links into Bellfield Estate as this will encourage current anti-social behaviour. This includes drug transactions, arson on the greenway and nearby trees, and damage to residents' houses and cars. The proposed new paths will simply provide an easier way for these activities to continue, serving as a "rat run" for youths and gangs to move between estates and evade authorities.</p>	<p>1. Noted. The intention of the link is to provide additional sustainable access to necessary local services including shopping, schools and community uses. There is a need to address perceived and real causes of ASB at locations within the vicinity of the SE Greenway. It is noted that the bridge is already in use by residents but that additional improvements to lighting and surveillance (CCTV) will be considered as is the case for other similar schemes throughout Ireland. KCC Parks Section is proactively engaging the provision of</p>

			<p>2. Proposal for large trucks to use the roundabout at our estate's entrance is not feasible. This is a very tight area used by both pedestrians and cars, and we can foresee a significant risk of accidents. This issue also highlights a contradiction in the overall plan, which aims to prioritize "active travel" while simultaneously introducing a large volume of motorized vehicle traffic.</p> <p>3. The large green area in Bellfield is meant for residents and their children to play, walk dogs, and enjoy. The introduction of permeability pathways will provide an off-road track for illegal activities. Question the necessity of these pathways given the new North-South road provides a dedicated cycle path and a large car park, offering a safe and viable alternative access point.</p> <p>4. Propose the existing bridge opening between Fíodh Mór and The Avenue be closed.</p>	<p>CCTV to increase safety and security in this area. Additional fencing has been provided along the bridge. Lighting and upgrading of this link have been put forward as one of the active travel proposals for 2026, however this is subject to national funding. The opening of the SE Greenway will see an increase in passive surveillance and activity, and it is expected that additional safety improvements will be proposed as part of a separate appraisal process. Propose to include a new objective in the draft Framework Plan <i>'KKC Active travel team/ Area Office to develop proposals to improve safety along the permeable link from Bellfield to Fíodh Mór'</i>.</p> <p>Proposals are indicative only. There are no proposals to remove the existing hedge adjacent to the green or to include new openings in that hedge. The function of the green space at Bellfield estate will be considered in any future development. For example, this could include placing the proposed green link walk to the east of the existing hedge and within future development. No amendment required.</p> <p>1 Assumption is that this refers to the South-North Road. The LTP proposes active travel enhancements to the existing junctions.</p> <p>2 The intention of the link is to provide additional sustainable access to necessary local services including shopping, schools playing fields and community uses for all members of the community.</p> <p>3 This proposal is not supported by the Plans but improvements to mitigate ASB are proposed as outlined above.</p>
--	--	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

KK-C330-38	Kilkenny Walsh Limited	Zoning	<ol style="list-style-type: none"> <li>1. Mount Sion lands are not necessary for redevelopment of the Ard Ri Hotel site and vice versa, requiring a masterplan for the entire landholding is unnecessary and inappropriate. Therefore, it is requested that the 'Land Use Zoning' section of the Draft Framework Plan, under the heading "Mixed Use Opportunity Site 1: Former Ard Ri Hotel and Environs", be amended to read "Mixed Use Opportunity Site 1: Former Ard Ri Hotel", with the exclusion of reference to "and environs", which relates to the Mount Sion lands.</li> <li>2. Requested that Mount Sion lands be zoned 'Residential', which will permit proposed housing and local commercial neighbourhood uses. This zoning will have no adverse impact on redevelopment potential of the Ard Ri Hotel site and will allow for much-needed housing to be delivered in the short term.</li> </ol>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1 KCC support this approach. Amend area of Masterplan to correspond with that on submission documents. Remainder of lands to be residential, . . TAC4 objective to be amended to. <i>Connectivity including Permeability /active travel links shall be demonstrated with the adjoining site which is subject to a masterplan for the Árd Rí hotel site and having regard to the BGI plan.</i></li> <li>2 As above</li> </ol>
KK-C330-39	Roisin Fitzpatrick	Transport	<ol style="list-style-type: none"> <li>1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.</li> </ol>	<ol style="list-style-type: none"> <li>1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review</b></li> </ol>

				<b>if access can be provided to the school from the Primary Health Care car park. No amendment required.</b>
KK-C330-40	Whitebox	Zoning	<p>Submission on behalf of Whitebox Group and its subsidiary company Kilkenny Investments Ltd (KIL) who own circa 75 acres of lands in the Abbey Road/ Ross Abbey Neighbourhood.</p> <p>the proposed draft zoning plan doesn't provide the extent of new residential zoning planned or hoped for at this important long term infrastructure investment stage of the Abbey Meadows land bank. Funding partners, required to deliver advanced infrastructure, will only invest where they can secure their investment against residential zoned lands, where these lands have value. They will not provide investment on strategic reserve zoned lands.</p> <p>Requested changed to draft zoning map:</p> <ol style="list-style-type: none"> <li>1. Lands marked A on the fig 3 map were incorrectly coloured and should have been coloured new residential, in accordance with the draft framework plan.</li> <li>2. Lands marked B on the fig 3 map were incorrectly coloured and should have been coloured strategic reserve zoned lands, in accordance with the draft framework plan.</li> <li>3. Lands marked C on the fig 3 map were incorrectly coloured as new residential zoned lands, however the homes on these lands are under almost complete and 50% of these are sold. These homes are also recognised in the draft framework plan table 5.1 as completed in terms of houses already delivered. These lands should be zoned existing residential.</li> </ol>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1. Error noted. Lands marked A on the fig 3 map will be changed to new residential, in accordance with the draft framework plan.</li> <li>2. Error noted. Lands marked B on the fig 3 map will be coloured strategic reserve zoned lands, in accordance with the draft framework plan.</li> <li>3. Required updated noted. Lands marked C on the fig 3 map will be zoned existing residential.</li> <li>4. Required update noted. The lands under the new South-North Link Road, that has planning permission and is due to commence in Q1 26, will be shown as a planned road. This will change the overall net quantum of new residential land in the Core Strategy.</li> <li>5. Noted. See response under point 6.</li> <li>6. Request noted and supported by KCC in the interests of providing additional land for new residential developments in alignment Section 28 Guidelines on Revised NPF Implementation and new housing growth requirements. In addition to sites A and B discussed above, sites D and E will also be zoned for New Residential development.</li> <li>7. KCC do not consider this request to be required in the context of point 6 above. No amendment required.</li> </ol>

			<p>4. The lands under the new link road, that has planning permission and is due to commence in Q1 26, is also zoned new residential. This should be shown as a planned road and the residential zoning attributed elsewhere.</p> <p>5. The draft framework plan identifies potential allotments in the existing walled garden (marked site A on Fig 3 of submission), These lands are not in KIL ownership. However, KIL have agreed a land swap, subject to the appropriate zoning with the owners of the walled garden. The walled garden owners want to swap for lands adjoining the proposed greenway car park and provide 'greenway related services' and elderly housing. The intention is that they will build a 2-storey commercial space that will provide greenway related services at ground floor, i.e. bike hire/ tourist office/coffee shop/ restaurant/ toilets etc and at first floor they would locate their Security Company Monitoring Station, where they provide 24/7, 365 days per year manned security surveillance to their residential and commercial customers nationwide. Having this manned security monitoring station at the Greenway and in Abbey Meadows can only but assist in managing any potential anti-social behaviour in and around the Greenway and will be of huge community benefit in the future. KIL are happy to accommodate the provision of allotments or a community garden along the eastern boundary, creating a buffer between the built environment and the planned open countryside/green corridor. Ask that the walled garden be</p>	
--	--	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

			<p>identified clearly for new residential use in both the framework plan and the new variation zoning plan.</p> <p>6. Request that all of the Abbey Meadows lands be identified for new residential zoning (Includes sites A, B, D, E on associated Fig 3 map in submission). Site E includes walled garden site discussed above.</p> <p>7. Ask that a policy, similar to Policy 2.8 in the current Ferrybank LAP, allowing for the development of strategic reserve residential lands to come forward for planning for new homes in the event that a developer with residential zoned lands has built out 75% of his residential zoned lands.</p>	
KK-C330-42	Jijan Jolly	Transport	<p>1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.</p>	<p>1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b></p>
KK-C330-44	ELISBA POULOSE	Transport	<p>1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and</p>	<p>1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to</p>

			pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.	improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b>
KK-C330-45	Natália Hoppe	Transport	1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.	1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b>
KK-C330-47	Tesco Ireland	Transport	1. Submission notes the County Development Plan recognises the importance of neighbourhood centres in providing accessible retail and service functions to local communities, thereby reducing the need for longer journeys and supporting sustainable travel patterns. Tesco's ability to meet customer expectations and uphold food safety standards is critically	Noted. 1 – 5: All transport proposals - including changes to junctions- will be subject to their own appraisal process. Any proposed changes to junctions will assess vehicle-tracking movements as standard and will be subject to consultation.

			<p>dependent on the timely and efficient delivery of fresh food products.</p> <p>2. <b>Access at Abbey Road / Tesco Roundabout:</b> The Tesco Express requires daily servicing by full-size articulated HGVs (13m trailer with artic unit). It is essential that the design of the Abbey Road / Tesco roundabout and associated junctions maintains full access and egress for these vehicles. We request that vehicle-tracking and swept-path analysis be undertaken to ensure unobstructed manoeuvrability.</p> <p>3. <b>Policy Objective RAN3 – Roundabout Redesign:</b> Tesco recognises and supports the objective of RAN3 to improve the safety and directness of pedestrian and cyclist movement at this key junction. However, it is essential that these works do not compromise the servicing requirements of existing commercial premises within the Ross Abbey Neighbourhood Centre.</p> <p>4. <b>Servicing via Front Entrance:</b> All deliveries to the Tesco Express are made via the front entrance, with no alternative servicing point available. Any proposals affecting the Ross Abbey / Tesco car park or associated areas must ensure that HGV access to the store’s front door is safeguarded.</p> <p>5. <b>Car Parking:</b> Measure PM 5 identifies Ross Abbey Neighbourhood Centre as a location where existing surface car parking could be better integrated with walking, cycling, and green infrastructure objectives. Tesco supports the principle of improving public realm quality and connectivity. However, it is</p>	<p>As above. Note Final Plan will use LTP’s definition as junctions rather than roundabouts.</p> <p>6-7:</p> <p>As above. Noted. Future restrictions on HGV’s is identified in both WMATS and the LTP as longer-term measures that will require engagement with a number of stakeholders at that point.</p>
--	--	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<p>equally important that any reconfiguration of parking provision does not compromise the accessibility or convenience that underpins the viability of the Neighbourhood Centre. Adequate car parking must be retained to serve both the Tesco Express and complementary retail/services within the Centre. Parking layouts must continue to facilitate HGV access to the store's servicing point at the front entrance. Any changes to circulation or bay configuration should be subject to consultation with key operators. It must be considered that any significant reduction in short stay parking could deter footfall and undermine the commercial viability of the centre.</p> <p>6. <b>Proposed HGV Restrictions:</b> The Draft Plan refers to potential HGV restrictions at Abbey Road and Belmont Road. Clarity on the type, extent, and timing of such restrictions; Confirmation that commercial premises within the Ross Abbey Neighbourhood Centre, including Tesco Express, will retain delivery access rights; Assurance that any time-based restrictions will be designed to accommodate standard delivery schedules.</p> <p>7. <b>Rerouting of HGV Traffic from Dock Road / Fountain Road (R711):</b> While Tesco supports the principle of diverting port-related HGV traffic away from the City Centre and Ferrybank, it is essential that full-size HGVs continue to be permitted to access and service local commercial properties. Should time restrictions be introduced, the operational requirements of</p>	
--	--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

			neighbourhood-serving businesses must be factored into their design.	
KK-C330-48	Peter Dunne	Impact of industrial projects on residential uses.	<p>Submission on behalf of residents of the Gurteens/Drumdowney area.</p> <ol style="list-style-type: none"> <li>1. Concerns about increased air &amp; noise pollution in the future.</li> <li>2. Effect of industrial expansion on local nature habitats and biodiversity.</li> <li>3. Inadequate water supply</li> <li>4. Movement of berm.</li> <li>5. Lack of screening along the greenway.</li> <li>6. Lack of green spaces.</li> <li>7. Increased volume of trucks and lorries associated with industrial developments. Local roads not equipped to handle such traffic.</li> <li>8. Seeking stricter environmental and noise control measures, provision for protection of local habitats and biodiversity establish buffer zones around residential areas, improved public transport and local roads.</li> </ol>	<ol style="list-style-type: none"> <li>1. Where appropriate the Council apply appropriate noise conditions in planning decisions issue. In cases where developments are subject to EPA licencing then environmental conditions are imposed solely through the EPA licencing regime and compliance with limits to the licences is a matter for the EPA.</li> <li>2. Policies and objectives are included in the draft plan to protect biodiversity and habitats. The draft plan has also undergone a full NIS stage 2 and SEA.</li> <li>3. The Council works with Uisce Eireann for the appropriate level of water services for all zoned land. Where services are deficient a developer may supply a private level of service such as a private well subject to appropriate standards.</li> <li>4. The berm referred to is the subject of a planning application and outside the scope of this report.</li> <li>5. Details of screening part of detailed design for the project</li> <li>6. Open spaces have not only been concentrated in the more densely populated parts of the plan but also have been earmarked within the port area and its hinterland.</li> <li>7. The industrial development areas are serviced by the N29 route down to the port which serves the port itself and the adjoining zoned land. AN objective will be included that KKC will investigate development of a HGV plan for the area which could restrict the use of certain roads which would be informed through signage and would be enforceable by the Gardai. Traffic calming measures</li> </ol>

				<p>could also be incorporated on roads where the use of heavy vehicles is to be discouraged</p> <p>8. The Planning authority follow best practice and the most up to date standards for proposed developments in the area.</p>
KK-C330-49	Catherine Manning	Community	<p>Submission provides comments in relation to:</p> <ol style="list-style-type: none"> <li>1. use of the greenway by students.</li> <li>2. lack of retail diversity in Ferrybank,</li> <li>3. anti-social behaviour on some estates.</li> <li>4. Ard Ri Hotel.</li> <li>5. proposed River Suir Walkway.</li> <li>6. community facilities; and</li> <li>7. biodiversity.</li> </ol>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1 KCC Parks Dept are investigation potential for provision of CCTV security cameras.</li> <li>2 The Ferrybank Shopping Centre has significant provision for retail use and is envisaged to be opened for such use in the plan period. The plan area has sufficient lands zoned for retail use.</li> <li>3 Noted. The intention of the link is to provide additional sustainable access to necessary local services including shopping, schools and community uses. There is a need to address perceived and real causes of ASB at locations within the vicinity of the SE Greenway. It is noted that the bridge is already in use by residents but that additional improvements to lighting and surveillance (CCTV) will be considered as is the case for other similar schemes throughout Ireland. KKC Parks Section is proactively engaging the provision of CCTV to increase safety and security in this area. Additional fencing has been provided along the bridge. Lighting and upgrading of this link have been put forward as one of the active travel proposals for 2026, however this is subject to national funding. The opening of the SE Greenway will see an increase in passive surveillance and activity, and it is expected that additional safety improvements will be proposed as part of a separate appraisal process. Propose to include a new objective in the draft Framework Plan 'KKC Active</li> </ol>

				<p><i>travel team/ Area Office to develop proposals to improve safety along the permeable link from Bellfield to Fiodh Mor’.</i></p> <p>Proposals are indicative only. There are no proposals to remove the existing hedge adjacent to the green or to include new openings in that hedge. The function of the green space at Bellfield estate will be considered in any future development. For example, this could include placing the proposed green link walk to the east of the existing hedge and within future development. No amendment required.</p> <p>4 The owners of the former Ard Ri Hotel have secured Section 5 planning permission from WCCC and KCC to enable refurbishment. A Development Objective (TAC4) has been included for a tourism masterplan for this area. No amendment required.</p> <p>5 The Blueway/River Suir Walkway is identified in WMATS as a potential future Greenway route and will be subject to future route selection process. No amendment required.</p> <p>6 The plan area includes land zoned for community use and open space that is sufficient for the planned population size.</p> <p>7 Relevant environmental studies have bene undertaken alongside the development of the framework plan including Appropriate Assessment (AA) and Strategic Environmental Assessment (SEA).</p>
KK-C330-50	Bellevue Residents Association	Zoning	1. Request that any reference to "future change of use from residential to port-related uses" and "prohibiting future residential development" be removed from the overall plan	Noted.

			<p>and allow any possible future residential expansion to be decided on a case by case decision by the planning authority. Prohibiting future residential development would prohibit additional smaller homes to be built within the curtilage of the dwelling to free up their current dwelling for use by either extended family members or new young couples. To allow "for a future change of use from residential to port-related uses " within these protected "Residential Amenity Belview" locations will force the residents out over the long term by allowing "port related use" infiltrate their "protected" residential zoning area.</p>	<p>1 Extension of residential zoning in this area is not considered appropriate give the focus on compact growth in this Urban Framework Plan. No amendment required.</p>
KK-C330-52	Sarah McGrath	Community	<ol style="list-style-type: none"> <li>1. Bellfield has not been referred to as its name only referred to as 'The Avenue'.</li> <li>2. Concerns that permeability links between Fiodh Mor and clover meadows and a proposed greenway access would exacerbate anti-social behaviour.</li> <li>3. Concerns proposed new access to the greenway at Fiodh Mor where there is no designated area for parking is going to increase the level of traffic through the estate.</li> <li>4. Advocates for no new permeability links into Bellfield Estate as this will encourage current anti-social behaviour.</li> <li>5. Concern that changes to Belmont Road will add to traffic congestion and cause issues existing the estate.</li> </ol>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1 Noted – instances of ‘the Avenue’ within the LTP text have been amended to ‘Bellfield’ as requested.</li> <li>2. Noted. The intention of the link is to provide additional sustainable access to necessary local services including shopping, schools and community uses. There is a need to address perceived and real causes of ASB at locations within the vicinity of the SE Greenway. It is noted that the bridge is already in use by residents but that additional improvements to lighting and surveillance (CCTV) will be considered as is the case for other similar schemes throughout Ireland. KKC Parks Section is proactively engaging the provision of CCTV to increase safety and security in this area. Additional fencing has been provided along the bridge. Lighting and upgrading of this link have been put forward as one of the active travel proposals for 2026, however this is subject to national funding. The opening of</li> </ol>

				<p>the SE Greenway will see an increase in passive surveillance and activity, and it is expected that additional safety improvements will be proposed as part of a separate appraisal process. Propose to include a new objective in the draft Framework Plan 'KCC Active travel team/ Area Office to develop proposals to improve safety along the permeable link from Bellfield to Fiodh Mor'.</p> <p>Each proposal will go through its own separate feasibility assessment process should that proposal be carried forward to dedicated planning and design stages in future. It is likewise envisaged that each individual proposal will undergo its own public consultation process at that time.</p> <p>It should also be noted that in the case of delivering permeability links such as the one indicated, works would typically incorporate safety-enhancement measures including but not limited to lighting and surveillance measures.</p> <p>3. Noted; see response to Point 2 above in relation to indicative nature of LTP proposals. All proposals, if considered for delivery in future, will undergo a full feasibility assessment and public consultation process. No amendment required.</p> <p>4. Noted; see responses to Points 2 and 3 above.</p> <p>5. Proposals within the LTP pertaining to potential improvements to Belmont Road are high-level and as such purely indicative and would be subject to their own feasibility assessment if considered in future.</p>
--	--	--	--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

				Additionally, it is envisaged that the proposed improvements would have negligible impacts if any on overall traffic flow, given the substantial existing width of the carriageway providing ample space for delivery of such measures.
KK-C330-53	Barbara Wells	Transport	1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.	1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b>
KK-C330-54	Amanda Ennis	Transport	1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.	1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review</b>

				<b>if access can be provided to the school from the Primary Health Care car park. No amendment required.</b>
KK-C330-56	Soumya Sasidharan	Transport	<ol style="list-style-type: none"> <li>1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.</li> </ol>	<ol style="list-style-type: none"> <li>1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b></li> </ol>
KK-C330-57	Gianina Olariu	Transport	<ol style="list-style-type: none"> <li>1. Concerns that permeability links between Bellfield/The Avenue, Fiodh Mor and Clover Meadows and a proposed greenway access would exacerbate anti-social behaviour.</li> <li>2. Concerns proposed new access to the greenway between Bellfield and Fiodh Mor where there is no designated area for parking is going to increase the level of traffic through the estate and be a hazard for children playing in Belfield.</li> </ol>	<ol style="list-style-type: none"> <li>1 Noted. The intention of the link is to provide additional sustainable access to necessary local services including shopping, schools and community uses. There is a need to address perceived and real causes of ASB at locations within the vicinity of the SE Greenway. It is noted that the bridge is already in use by residents but that additional improvements to lighting and surveillance (CCTV) will be considered as is the case for other similar schemes throughout Ireland. KKC Parks Section is proactively engaging the provision of CCTV to increase safety and security in this area. Additional fencing has been provided along the bridge. Lighting and upgrading of this link have been put forward as one of the active travel proposals for 2026, however this is subject to national funding. The opening of</li> </ol>

				<p>the SE Greenway will see an increase in passive surveillance and activity, and it is expected that additional safety improvements will be proposed as part of a separate appraisal process. Propose to include a new objective in the draft Framework Plan '<i>KKC Active travel team/ Area Office to develop proposals to improve safety along the permeable link from Bellfield to Fiodh Mor</i>'.</p> <p>Each proposal will go through its own separate feasibility assessment process should that proposal be carried forward to dedicated planning and design stages in future. It is likewise envisaged that each individual proposal will undergo its own public consultation process at that time.</p> <p>It should also be noted that in the case of delivering permeability links such as the one indicated, works would typically incorporate safety-enhancement measures including but not limited to lighting and surveillance measures.</p> <p>2. Noted; see response to Point 1 above in relation to indicative nature of LTP proposals. All proposals, if considered for delivery in future, will undergo a full feasibility assessment and public consultation process. No amendment required.</p>
KK-C330-58	Rahaf Manaa	Transport	<p>1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking.</p>	<p>1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction</p>

			Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.	with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b>
KK-C330-59	Joan Frawley	Economic Development	<ol style="list-style-type: none"> <li>1. Concerned about the increasing encroachment of industrial development into our residential area and property.</li> <li>2. Lack of meaningful engagement with local residents.</li> <li>3. Traffic and road safety concerns. Speeding of heavy goods vehicles is a concern on the Port Road, a road that local residents need to use daily. Road surface is also a concern.</li> <li>4. Noise pollution from already existing production facilities.</li> <li>5. Lack of green spaces and visual amenities for people in general and particularly local residents and workers.</li> <li>6. Request that the planning authority amend the development plan to introduce more green space and clear and enforceable buffer zone between homes and the industrial sites.</li> </ol>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1. A requirement for buffers has been including in the Framework Plan under zoning requirements for 'Residential Amenity Belview', and within Chapter 8 Belview Port and Industrial Area'. Further detail on landscape buffers is included under Belview Industrial Area Development Management Standards, which requires a woodland planting buffer of 15-20 metres. No amendment required.</li> <li>2. Opportunity was provided engage in the plan development at pre-draft stage and at draft stage including placing plans on the Kilkenny County Council Consultation Portal, invitation of submission and public drop in workshops which were well publicised and notified to local community groups. The draft LTP includes issues raised from the Issues Paper, consultation with a wide range of stakeholders. The final Plan will consider issues raised as part of this consultation process.</li> <li>3. Noted. KCC will engage with TII on potential solutions to identified speeding issues of HGVs on the Port Road.</li> <li>4. Development is subject to EPA standards and associated planning permission conditions.</li> </ol>

				5. and 6. The Framework Plan identifies a range of public open space including permeability corridors, areas of biodiversity protection, a proposed Suir River Blueway, the zoning map highlights areas of open space, both passive and active. Further reference is made to the joint Blue Green Infrastructure Strategy which identifies several new initiatives in the area. No amendment required.
KK-C330-60	Seamus Walsh via Fewer Harrington and Partners	Zoning	1. Request that the Draft Framework Plan be amended to remove the Mount Sion lands from the “Mixed Use Opportunity Site 1” designation, and to Zone the Mount Sion lands as Residential. This amendment will enable the immediate delivery of new housing, align with An Bord Pleanála’s findings, support compliance with national housing policy, avoid unnecessary dependency between two unrelated land parcels.	Noted.  Please note response under submission #38.
KK-C330-62	Eamon, Maura, Edmund Doherty	Biodiversity	1. Submission raises concerns about route of proposed Suir River Walkway between the IDA Technology Park and Belview Port and potential impact on biodiversity. Bellevue House and associated derelict service buildings are located on a private working farm and are not accessible to the public as part of any future historic trail. Anti-social behaviour on unopened Greenway, between Waterford and New Ross also highlighted.	Noted. 1 The development of a future Blueway/ Suir River Walkway will be subject to a route assessment and will be open to public consultation at that time. No amendment required.
KK-C330-63	Romania Germani  J & R Canning	Transport	1. Objects to a walkway from Belfield to Fiodh Mor. Unsocial behaviour highlighted, with the cause believed to be the bridge. Concern that a greenway access at this location will bring increased parking in the Bellfield / Fiodh Mor area particularly at the back of both estates where it is close to the	1 Noted. The intention of the link is to provide additional sustainable access to necessary local services including shopping, schools and community uses. There is a need to address perceived and real causes of ASB at locations within the vicinity of the SE Greenway. It is noted that the bridge is already in use by residents but that

			<p>proposed access. This will bring increased traffic into Bellfield which will cause a danger to young children playing outside. Query how access of electric scooters, scramblers and motorbikes would be prohibited.</p> <p>2. The indicative masterplan of lands between Belmont Road and Abbey Road [Fig 6-13] indicates access through the large green space in Bellfield. This is used by residents for activities, walking dogs and by children. Concern that permeability access will facilitate anti-social behaviour at this location. Questions need for cycle access at this location given North-South road is designed to take cyclists to the greenway and associated car park.</p> <p>3. Plans to redevelop Belmont Road and prioritise active travel by narrowing the road are envisage to cause traffic tailbacks.</p>	<p>additional improvements to lighting and surveillance (CCTV) will be considered as is the case for other similar schemes throughout Ireland. KKC Parks Section is proactively engaging the provision of CCTV to increase safety and security in this area. Additional fencing has been provided along the bridge. Lighting and upgrading of this link have been put forward as one of the active travel proposals for 2026, however this is subject to national funding. The opening of the SE Greenway will see an increase in passive surveillance and activity, and it is expected that additional safety improvements will be proposed as part of a separate appraisal process. Propose to include a new objective in the draft Framework Plan <i>'KKC Active travel team/ Area Office to develop proposals to improve safety along the permeable link from Bellfield to Fiodh Mor'</i>.</p> <p>Each proposal will go through its own separate feasibility assessment process should that proposal be carried forward to dedicated planning and design stages in future. It is likewise envisaged that each individual proposal will undergo its own public consultation process at that time.</p> <p>It should also be noted that in the case of delivering permeability links such as the one indicated, works would typically incorporate safety-enhancement measures including but not limited to lighting and surveillance measures.</p> <p>2. Noted; please refer to above response (Point 1).</p>
--	--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

				<p>3. Noted; please refer to response to Point 1 regarding the high-level indicative nature of the LTP proposals on road improvements. Additionally, it is envisaged that the potential future delivery of traffic-calming measures and prioritisation of active travel modes on Belmont Road would have negligible impacts if any on overall traffic flow, given the substantial existing width of the carriageway providing ample space for improvements.</p>
KK-C330-64	Newrath Residents and Business Association	Zoning	<ol style="list-style-type: none"> <li>1. Submission identifies two sites adjacent to the Newrath Link Road (R448) &amp; Newrath Cul de Sac (L3408) and welcomes proposed continued zoning for these lands as Passive Open Space, and proposed zoning of additional lands in this area as passive open space.</li> <li>2. Highlights that Newrath cul-de-sac (L3408) was historically part of the main Dublin to Waterford road until it became a cul de sac upon the opening of the Waterford City bypass and associated road network including the current R448 in 2009. The L3408 cul de sac was not realigned in the subsequent years, and enhancement works to this road are necessary in the interest of local amenity and safety, to include a reduction in the width of the road and hard shoulder, introduction of traffic calming measures and planting.</li> </ol>	<ol style="list-style-type: none"> <li>1 Noted.</li> <li>2 Noted. The draft Local Transport Plan identified a number of traffic calming measures for Newrath Rd including new footpaths and junction tightening. Text can be included in Chapter 11 of the LTP (Walking and the Public Realm) acknowledging the potential for future enhancement works and public realm improvements on Newrath Road/L3408.</li> </ol>
KK-C330-65	Ballagh Holdings Ltd/John Spain Associates	Zoning	<ol style="list-style-type: none"> <li>1. Submission prepared by John Spain Associates on behalf of Ballagh Holdings Ltd., a Limetree Global entity, in association with Reddy Architecture and Urbanism, Clifton Scannell Emerson Associates, CBRE Property Consultants, Frank Fox &amp;</li> </ol>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1 KCC support this proposal.</li> </ol>

		<p>Associates, CSD Engineering and Coakley Consulting Engineers. This submission, in conjunction with the Draft Masterplan document prepared by Reddy Architecture and Urbanism, seeks to demonstrate how the Mullinabro lands can contribute positively to the achievement of the vision and objectives of the Framework Plan in a manner consistent with good urban design principles and which will deliver enterprise opportunities, a sustainable new neighbourhood with associated community facilities, services and, served by public transport. Infrastructure and utilities assessments have been prepared by CSEA in respect of data centres, Frank Fox Consulting Engineers, CSD Engineering and Coakley Engineers seek to demonstrate there are few obstacles to potential future development on site. A market assessment prepared by CBRE property advisers seeks to demonstrate the existing demand for logistics and other uses at this location. The purpose of this document is to outline the strategic nature of the Mullinabro lands which are located on the northern edge of the Waterford urban area / Ferrybank/Belview and South Kilkenny, close to the existing national road network and to be served by planned road upgrades, public transport and pedestrian / cycling routes as part of the Waterford Metropolitan Area Transport Strategy. Advocates that there is clear policy support for data centre uses and a demonstrable suitability of the lands for such a use with respect to the necessary infrastructure.</p>	<p>2 Zoning map to be changed to indicate that the western portion of the Mullinabro lands are zoned 'BETP – Business, Enterprise and Technology Park'.</p> <p>KCC do not consider that the zoning should provide for light industrial uses at this or other locations zoned for BETP. Note Permissible uses include for data centres (Section 8.6 of the draft Framework Plan). (Note proposed amendment under submission response #67 to include provision for Energy Park under permissible uses for BETP zoning, and Battery/Energy Storage under Open for Consideration under BETP zoning).</p>
--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<p>2. Requested that the western portion of the Mullinabro lands are zoned 'BETP – Business, Enterprise and Technology Park' centres and that the zoning should make express provision for 'warehouse/light industrial' uses in the zoning matrix.</p>	
KK-C330-66	Michael Morrissey	Economic Development	<p>Submission on behalf of Smart Ply Europe seeks:</p> <ol style="list-style-type: none"> <li>1. Deletion of Objective NPIA3 (Glasshouse Park) due to zoning conflict (conflict with SEVESO and high volume industrial areas), safety risks and no public access.</li> <li>2. Inclusion of a freight corridor protection policy (N29 + rail) as this aligns with multiple stakeholder submissions and national freight priorities.</li> <li>3. Addition of energy infrastructure objective for Belview, as this prepares gird for industrial electrification and avoids capacity bottlenecks.</li> <li>4. Reinforcement of zoning buffers for PFI adjacent areas as this prevents residential/industrial and use conflict.</li> <li>5. Acknowledgment of timber in construction alignment as this supports national strategy and SmartPlys environmental leadership.</li> <li>6. Support for creation of a Belview Port Rail Industrial Forum as this enables collaborative planning and reduces future infrastructure disputes.</li> <li>7. Flexibility for substation siting and routing by Eirgrid/ESB networks and/or private wires in the future.</li> <li>8. Recognition of Belview as a strategic decarbonisation node in the national industrial electrification agenda.</li> </ol>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1. See submission 12 for response in relation to the Glasshouse site. Note there is no SEVESO site in the Belview Port area. The Draft - Framework Plan has an overall stated objective of increasing the area of lands provided for open space and biodiversity/conservation in line with wider EU objectives in relation to the EU Nature restoration law. The amendment of Knockmullen House area from Open Space to Port related uses is not considered appropriate, given the biodiversity value of the site, and notwithstanding proximity to the Port uses. No amendment required.</li> <li>2. The N29 is a National Road and does not require any further designation. No amendment required. Reference is made in the Framework Plan to the importance and potential of Belview Port as an Energy Centre of Excellence (Chapter 8, section 8.5). This section references the need for the upgrade of electrical transmission infrastructure between the Port and Great Island Power Station. No amendment required.</li> <li>3. Noted. While text is included with regard to the buffering of new development within Chapter 8, section 8.6, additional text can be provided to reinforce the need for buffering under the zoning objective for PFI:</li> </ol>

			<p>9. Allowance for a private wire installation between sites in the port area to allow the port to become a solar energy hub.</p>	<p>Port Facilities and Industry (PFI)</p> <p><i>Objective: To provide for light industry, technology and the expansion of port and ORE related activity. Existing residences should be appropriately screened and buffered in any development application.</i></p> <p>5. Text with regards to timber in construction alignment is not considered necessary in this plan. No amendment required.</p> <p>6. Formation of a Belview Port Rail Industrial Forum is a matter for those businesses that wish to be part of such a forum. No change required. No amendment required.</p> <p>7. Provision of private or public infrastructure is supported by the plan. No amendment required.</p> <p>8. The importance of Belview Port is recognised in Chapter 8 and the County Development Pan. No amendment required.</p> <p>9. Provision of private or public infrastructure is supported by the plan. No amendment required.</p>
KK-C330-67	Aislin O'Brien/SLR Consulting	Zoning	<p>1. The glass house location on the Development Objectives Map (Figure 3) instead refers to BPIA4 which seeks to ensure any development of Belview House secures the future of the walled garden and outbuildings. This appears to be an incorrect location which will need to be reviewed.</p> <p>2. The map referred to as Heritage Review List of Protected Structures also fails to identify the Glasshouse.</p> <p>3. The Development Objective Map (Figure 3) also needs to be revised to identify key projects of relevance to the future development of the Port such as the upgrade of the electrical</p>	<p>Noted.</p> <p>1 and 2 Noted. Correct location now shown. Development Objectives Map to be updated.</p> <p>3. Development Objectives map and associated table will be reviewed and updated as appropriate.</p> <p>4. Proposed transport improvements to Belview Port are highlighted on key overview maps for each mode within the accompanying Ferrybank-Belview Local Transport Plan. These include: Fig.12-5: Indicative Active Travel Strategy</p>

			<p>transmission infrastructure between the Port and Great Island which would be required to facilitate the development of port as an Energy centre of excellence as referenced in Section 8.5 of the Framework Plan.</p> <p>4. With the exception of the proposed active travel route in BPIA8, other projects which should be referenced on the Development Objectives Map include: BPIA6 Continue to work with Transport Infrastructure Ireland to finalise an approach an upgraded junction arrangement at the N29/L3412 junction; BPIA7 Provide access to the IDA lands with an upgrade to the existing local road (the L3412) in cooperation with the IDA.</p> <p>5. The Development Objective Map also needs to be revised to expressly identify existing rail freight infrastructure which is a critical component of Port infrastructure and a component that also identified in the Climate Action Plan 2025 and the Rail Freight 2040 Strategy.</p> <p>6. Better recognise Belview Port’s unique position in terms of multi-modal access and rail freight, with road, rail and infrastructure links, with a unique capability to provide interconnected logistics chains.</p> <p>7. Support the development of the necessary port infrastructure and associated road and rail connectivity required for the development of the Port, to enhance the role of the Port as an Economic Driver for the South-East. Update the development objectives map to identify this infrastructure including deficits and future requirements. Ensure Development Objective Maps</p>	<p>Fig.13-3: Indicative Permeability Proposals  Fig.14-9: Indicative Bus Proposals  Fig.15-9: Indicative Map of Proposed Speed Limits</p> <p>5. Development Objectives map and accompanying table to be reviewed and updated.</p> <p>5. Sec. 14.7.2 and Measure PT4 of the accompanying Ferrybank-Belview LTP makes specific reference to the importance of enhancing rail freight connectivity between Belview Port and Rosslare Europort, an aspiration shared by WMATS, the WCDP, and the RSES for the Southern Region.</p> <p>6. The strategic role and importance of Belview Port has been highlighted in the draft Framework Plan, including opportunity for growth, access links, and potential contribution to the green economy through use of green energy and ORE opportunities. See responses to Points 4 and 5 above Re: established proposals for improved connectivity and access to Belview Port as set out within the Ferrybank-Belview LTP.</p> <p>7. See responses to Points 4 and 5 above Re: established proposals for improved connectivity and access to Belview Port as set out within the Ferrybank-Belview LTP. It is considered that further detail than this (e.g. inclusion of the proposed Cheekpoint Lower Bar River Training Wall) is less appropriate at the Local Transport Plan level, with many such measures already captured within the Port of Waterford Masterplan 2022-2044.</p>
--	--	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<p>are corrected and consistent throughout. Include reference in the Framework Plan to future infrastructural requirements of the Port including the Proposed Cheekpoint Lower Bar River Training Wall.</p> <p>8. Any measures for active travel within the Port Facilities should be removed from the Framework Plan as it poses a health and safety risk for vulnerable road users and has potential to impact the operation of a national road and a strategic Port, as outlined above. The proposal for an access point to the Greenway at the junction of the N29 should be removed from the Framework Plan as it poses a health and safety risk for vulnerable road users and has potential to impact the operation of a national road and a strategic Port.</p> <p>9. Review the Passive Open Space Zoning and amenity zoning within the 'Port Facilities and Industry zoning area', in particular, at the Glasshouse site. Given the location and nature of the specialist Port Facilities, it is considered a direct conflict to provide an amenity Park at this location. This Park would be situated within the industrial zone, which would give rise to health and safety issues, and conflict between Port operations and members of the public. It is submitted that passive open and amenity parks are more suited to the adjacent 'Business, Enterprise and Technology Parks', where there is more opportunity for staff and members of the public to enjoy these spaces in a quieter and more peaceful environment.</p>	<p>8. Noted. The active travel measures set out in the UFP and LTP were developed through a process of review and incorporation of feedback from TII. The proposals set out in both reports are purely indicative, and continued consultation with TII in relation to specific proposals with the potential to impact the national road network will continue should individual plans be progressed for planning and design during the lifetime of the Plan.</p> <p>9. Amend zoning and Table 5-6 text for BPIA3 to <b>"Permit appropriate uses on the site of Glasshouse and Knockmullan Gardens subject to the retention of the features of the garden, the integration of the proposal with its character and the adoption of a woodland management plan. ( amend table 8.7 to reflect the above)</b>  Addition of the following text to Port Facilities and Amenity (PFI) zoning description in section 8.6 (p61):  <i>Development Objective BPIA 3 in relation to Knockmullan House and the Glasshouse is to be considered in any future development proposals within the lifetime of the Plan.</i></p> <p>10. Industrial use, permitted under PFI zoning is considered to be less compatible with neighbouring residential development and emerging trends than development considered acceptable under BETP zoning, hence the change.</p> <p>11. Agreed. Change to be made to BETP and PFI zoning permissible uses: Business Enterprise and Technology Parks (BETP)  PFI permissible uses to read:</p>
--	--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<p>10. Provide a rationale for the reduction in zoned land as Industrial Technology Park now Business, Enterprise and Technology Parks (BETP).</p> <p>11. Provide for 'energy park' as a permitted use in the Port Facilities and Industry (PFI) Objective and Business Enterprise and Technology Parks (BETP) Objective.</p> <p>12. Provide for Battery/ Energy Storage uses under open for consideration uses in Port Facilities and Industry (PFI) Objective and Business Enterprise and Technology Parks (BETP) Objective</p> <p>13. Ensure sufficient land is zoned by making available the analysis supporting the approach to zoning set out in this framework plan.</p> <p>14. Provide further clarity on the requirement for masterplans by identifying the area that will require them and defining the term significant development. Any Masterplan should be Local Authority led in partnership with key stakeholders and landowners, ensuring that effective and deliverable master plans are established to meet the development needs and opportunities in this area.</p>	<p>Permissible Uses: Cafe, Car Park, Childcare Facilities (crèche/nursery), Enterprise Centre / Campus Industry, Data Centre, <b>Energy Park</b>, Open Space, Park and Ride facility, retail which is ancillary to the primary use.</p> <p>Port Facilities and Industry (PFI)</p> <p>BETP permissible uses to read:</p> <p>Permissible Uses: Car/Truck Park, industry (General Industrial use), Industry (Light), Port related office, Construction Support, Data Centre, <b>Energy Park</b>, Operations and Maintenance facilities supporting the ORE industry open space, park and ride facility, silos and storage areas, storage tanks including bulk liquid storage and general warehousing, wholesale/warehousing.</p> <p>12. Agreed. Change to be made to BETP and PFI zoning open for consideration uses:</p> <p>Business Enterprise and Technology Parks (BETP)</p> <p>Open for Consideration: Advertising Board, ATM, Car Repair/ Sales, Cultural/Recreational building, Education, Playground, Public House, Restaurant, Service/Petrol Station, <b>Battery/ Energy Storage</b>, Recycling Centre (bottle banks, etc).</p> <p>Port Facilities and Industry (PFI)</p> <p>Open for consideration: Battery/<b>energy</b> storage, electricity transmission infrastructure, Advertising board, ATM, buildings for the health, safety and welfare of the public, cafe, car repair/sales, childcare facilities, enterprise centre/campus industry, service/petrol station, recycling centre (bottle banks, etc), Shop - Convenience outlet , water based recreational cultural activities.</p>
--	--	--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

				<p>13. A settlement capacity audit was carried out focusing on infrastructure delivery and suitable land zoning as per the NPF and examined the lands for suitability of current along with lands with potential residential and employment development lands for zoning suitability. Please see updated SCA in Technical Appendix 1.</p> <p>14. It is noted that development in the port area is guided by the Port of Waterford Masterplan 2020 – 2044 published in October 2020. No amendment required.</p>
KK-C330-69	Ferrybank Community Development Residents Group	Community	<p>Submissions advocates:</p> <ol style="list-style-type: none"> <li>1. <b>Inclusion of a specific objective to secure community centre space and fit-out in the shopping centre</b> (or equivalent early-delivery site) and to scope a co-located ‘family resource’ style hub for coordinated services.</li> <li>2. <b>In relation to the rendering/abattoir uses</b>, designation of HGV routes that avoid the village/‘heart of Ferrybank’ streets; coordinate with TII and Waterford City &amp; County Council to keep HGVs on the N25/N29/bypass network.</li> <li>3. <b>In relation to the Ferrybank Shopping Centre</b>, a transport/access plan that sequences and manages approaches, provides short-stay bays for local trade, and prevents heavy flows from being funnelled through the heart.</li> <li>4. <b>In relation to Abbeylands Community College</b>, (a) a full junction/signal audit and a scheme for a proper signalised crossing system at the school; (b) continuous, legible footpaths and cycle facilities with safe setbacks; (c) event-day/set-down management plans that do not rely on unproven land transfers.</li> </ol>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1 Plan includes objective C2 “Work with the owners of the Ferrybank Shopping Centre to deliver a community centre within the Ferrybank Shopping Centre”. No amendment required.</li> <li>2 Measure RN10 of the accompanying Ferrybank-Belview Local Transport Plan (LTP) addresses the need for management of HGV movement and recommends delivery of HGV restrictions on the Abbey Road and Belmont Road in the medium-to-long term in order to improve safety for all road users.</li> <li>3 Noted. Mobility Management Plans (MMPs) for individual developments fall outside of the remit of a higher-level Urban Framework Plan or LTP. However, it should be noted that Measure SM5 of the accompanying Local Transport Plan would require inclusion of MMPs in planning applications for trip-intensive developments within the Ferrybank-Belview area.</li> <li>4 Measure WK7 of the accompanying LTP states the following in relation to the junction outside of Abbey Community College:</li> </ol>

		<p>5. <b>In relation to proposed permeability measures at Belfield/Fiadh Mór</b>, adopt Crime Prevention Through Environmental Design (CPTED) measures—adequate lighting, passive surveillance, selective barriers/dissimilar surfaces to deter scramblers, clear sightlines, and managed/defensible access points. Where multiple accesses are proposed in close proximity (e.g., around Belfield), rationalise to minimise unmanaged parking, congregation points and rat-runs; include enforcement/management plans and monitoring.</p> <p>6. <b>In relation to parking strategy and private enforcement</b>, Coordinate transport-hub parking, short-stay near shops, and residential protections; assess cumulative impacts on adjacent streets and school peaks.</p> <p>7. <b>In relation to movement, link roads and park &amp; ride</b>, Progress the Aldi roundabout–Abbey Gate link to relieve the Abbey Road and enable safe school access on foot/bike; Work with TII and Waterford City &amp; County Council to keep through-traffic—especially HGVs—on the bypass network; explore time-based HGV restrictions at sensitive locations/peaks; Assess park-and-ride at suitable nodes (e.g., near key roundabouts) to reduce city-centre car trips across the sustainable transport bridge.</p> <p>8. <b>In relation to heritage, trees and ‘Ard Rí Aspiration’</b>, Undertake a formal heritage appraisal and provide interpretation: map boards, signage and short narratives for key sites; retain and extend tree cover (e.g.,</p>	<ul style="list-style-type: none"> <li>• <i>“KCC will collaborate with WCCC and the NT to examine future opportunities to rebalance public space at this junction that should consider, at a minimum:</i> <ul style="list-style-type: none"> <li>- <i>Reassessing need for a roundabout at the junction of Fountain St and Abbey Road and to provide opportunities to cross.</i></li> <li>- <i>Assessing need to provide DMURS aligned carriageway reductions at the realigned Abbey Road to provide traffic-calming / speed reductions.</i></li> <li>- <i>Maximising safety treatments and landscaping opportunities close to the entrance of Our Lady of Good Counsel G.N.S. and Abbey Community College.”</i></li> </ul> </li> </ul> <p>5. Noted. The intention of the link is to provide additional sustainable access to necessary local services including shopping, schools and community uses. There is a need to address perceived and real causes of ASB at locations within the vicinity of the SE Greenway. It is noted that the bridge is already in use by residents but that additional improvements to lighting and surveillance (CCTV) will be considered as is the case for other similar schemes throughout Ireland. KKC Parks Section is proactively engaging the provision of CCTV to increase safety and security in this area. Additional fencing has been provided along the bridge. Lighting and upgrading of this link have been put forward as one of the active travel proposals for 2026, however this is subject to national funding. The opening of the SE Greenway will see an increase in passive surveillance and activity, and it is expected that additional safety improvements will be proposed as part of a separate appraisal process. Propose to include a new objective in the draft Framework Plan <i>‘KCC Active travel team/</i></p>
--	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<p>Christendom/Rocklands); Support the River Walk and blue/green infrastructure while addressing rail-interface feasibility and safe access/parking; manage access points to avoid unmanaged roadside parking; Retain the Ard Rí regional-park aspiration in the plan and examine reuse options for the pitch-and-putt site.</p> <p>9. <b>In relation to multi-sport campus and indoor access</b>, re-examine the quantum of land reserved for present/future needs across codes (soccer, GAA, athletics, rugby, basketball, etc.); Favour a multi-sport campus model to optimise supervision, access and shared facilities; pursue community access agreements with schools for indoor court use where possible.</p> <p>10. <b>In relation to delivery, resourcing and ongoing engagement</b>, assign a dedicated local development/coordination resource and a small landscaping/maintenance crew for the Ferrybank area to care for emerging public realm and links; Continue structured engagement with residents, local schools and businesses as detailed designs advance; log issues raised at public meetings and report back on responses/actions.</p>	<p><i>Area Office to develop proposals to improve safety along the permeable link from Bellfield to Fiodh Mor’.</i> Each proposal will go through its own separate feasibility assessment process should that proposal be carried forward to dedicated planning and design stages in future. It is likewise envisaged that each individual proposal will undergo its own public consultation process at that time.</p> <p>It should also be noted that in the case of delivering permeability links such as the one indicated, works would typically incorporate safety-enhancement measures including but not limited to lighting and surveillance measures.</p> <p>5 Noted. Proposed management of car-parking within Ferrybank-Belview, including recommendations for on-street and off-street parking, residential parking standards, and mobility points are addressed in Measures PM1 – PM8 of “Ch.16: Parking Management” in the accompanying Ferrybank-Belview LTP.</p> <p>6 Noted. The accompanying Ferrybank-Belview LTP addresses a number of the issues raised in this submission, including:</p> <ul style="list-style-type: none"> <li>• Measure RN7 – New Road: South-North Access Road (Ch. 15)</li> <li>• Measure RN10 – Managing HGV Movement (Ch. 15)</li> <li>• Measure PM3 – Park and Ride Facilities (Ch. 16)</li> </ul> <p>7 Noted. As a long-term objective of the accompanying LTP, proposed Measure CY1 – Ferrybank Belview Cycling Network incorporates the delivery of a Blueway / Suir River Walkway following the northern bank of the river from Christendom in the</p>
--	--	--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

				<p>west to the IDA Park in the east via Gyles' Quay. A project in the vicinity of the Ard Ri hotel is further referred to within the joint Blue Green Infrastructure Strategy for the Waterford MASP area.</p> <p>8 Design of facilities at this site will be subject to separate detailed design and engagement processes. No amendment required.</p> <p>9 This is not considered an issue for this Plan.</p>
KK-C330-70	Carmel Wemyss	Transport	<p>1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.</p>	<p>1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b></p>
KK-C330-71	Maire and Paul Roche	Heritage	<p>1. Concern over N29 port road surfacing, need for speed limit/enforcement, noise/air/environmental pollution, and need for engagement with KCC Heritage Officer in relation to future development.</p>	<p>Noted. Road maintenance, speed and safety issues are within the remit of Transport Infrastructure Ireland (TII). All future development proposals will, where appropriate, be subject to environmental assessment including evaluation of potential air, noise environmental and visual pollution and the acceptability of proposals will be assessed by the Competent Authority on consideration on impacts and mitigation measures proposed. The views of Prescribed Bodies such as TII and all relevant stakeholders will be considered. Impacts on built and</p>

				<p>cultural heritage will also be assessed as part of any future development proposals and associated impacts carefully considered. The Heritage Officer of KCC was consulted with in the preparation of the Framework Plan.</p>
KK-C330-74	Richard McGrath	Economic Development	<ol style="list-style-type: none"> <li>1. <b>Zoning and Land Use:</b> Concerned about the increasing encroachment of industrial development into our residential area and property. Urge the Council to re-evaluate the zoning of this area to ensure a clear and defensible buffer zone is maintained between residential and industrial lands.</li> <li>2. <b>Traffic and Road Safety:</b> High volume of HGV traffic on the local road network, particularly the N25, lead to increased congestion, noise, and significant road safety concerns for pedestrians, cyclists, and particularly for children attending Slieverue National School, Ringville National School, GreenAcres Creche, Slieverue Playgroup and the Jonah Special School along with patrons of the Greenway.</li> <li>3. <b>Noise Pollution:</b> from existing industry facilities and future development impacting residential amenity.</li> <li>4. <b>Air and environmental pollution:</b> request that a full and comprehensive environmental impact assessment (EIA) be required that specifically addresses the cumulative impacts of industrial activity in the area on air quality.</li> <li>5. <b>Visual Amenity and Landscape:</b> visual intrusion of large industrial sheds, fencing, and signage will have a negative</li> </ol>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1. A requirement for buffers has been including in the Framework Plan under zoning requirements for 'Residential Amenity Belview', and within Chapter 8 Belview Port and Industrial Area'. Further detail on landscape buffers is included under Belview Industrial Area Development Management Standards, which requires a woodland planting buffer of 15-20 metres. No change required.</li> <li>2. Measure RN10 of the accompanying Ferrybank-Belview Local Transport Plan (LTP) addresses the need for management of HGV movement and recommends delivery of HGV restrictions on the Abbey Road and Belmont Road in the medium-to-long term in order to improve safety for all road users.</li> <li>3. All future development proposals will, where appropriate, be subject to environmental assessment including evaluation of potential air, noise environmental and visual pollution and to impacts on cultural and built heritage.</li> <li>4. See point 3.</li> <li>5. See point 3.</li> <li>6. Noted. See point 1 and point 3 which will help to safeguard the residential amenity of adjacent properties.</li> </ol>

			<p>impact on the visual amenity of the area and devalue surrounding properties.</p> <p>6. <b>Property Devaluation:</b> introduction of industrial development directly adjacent to residential properties will have a significant financial impact on homeowners.</p> <p>7. <b>Lack of Public Infrastructure:</b> local infrastructure, including water, drainage, wastewater, and utilities, is not sufficient to support the increased demands of a new industrial development. I request a thorough assessment of the capacity of existing services.</p>	<p>7. Future development will be subject to infrastructure assessment. This has further been considered within the SCA in the Technical Appendix.</p>
KK-C330-75	Anbarasi Nallathambi	Transport	<p>1. Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.</p>	<p>1 Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b></p>
KK-C330-76	Sinead O'Donovan	Community	<p>1. <b>Zoning and Land Use:</b> Concerned about the increasing encroachment of industrial development into our residential area and property. Urge the Council to re-evaluate the zoning</p>	<p>Noted.</p> <p>1. A requirement for buffers has been including in the Framework Plan under zoning requirements for 'Residential Amenity Belview', and within Chapter 8 Belview Port and Industrial Area'. Further</p>

			<p>of this area to ensure a clear and defensible buffer zone is maintained between residential and industrial lands.</p> <ol style="list-style-type: none"> <li>2. <b>Traffic and Road Safety:</b> High volume of HGV traffic on the local road network, particularly the N25, lead to increased congestion, noise, and significant road safety concerns for pedestrians, cyclists, and particularly for children attending Slieverue National School, Ringville National School, GreenAcres Creche, Slieverue Playgroup and the Jonah Special School along with patrons of the Greenway.</li> <li>3. <b>Noise Pollution:</b> from existing industry facilities and future development impacting residential amenity.</li> <li>4. <b>Air and environmental pollution:</b> request that a full and comprehensive environmental impact assessment (EIA) be required that specifically addresses the cumulative impacts of industrial activity in the area on air quality.</li> <li>5. <b>Visual Amenity and Landscape:</b> visual intrusion of large industrial sheds, fencing, and signage will have a negative impact on the visual amenity of the area and devalue surrounding properties.</li> <li>6. <b>Property Devaluation:</b> introduction of industrial development directly adjacent to residential properties will have a significant financial impact on homeowners.</li> <li>7. <b>Lack of Public Infrastructure:</b> local infrastructure, including water, drainage, wastewater, and utilities, is not sufficient to support the increased demands of a new industrial</li> </ol>	<p>detail on landscape buffers is included under Belview Industrial Area Development Management Standards, which requires a woodland planting buffer of 15-20 metres. No change required.</p> <ol style="list-style-type: none"> <li>2. Measure RN10 of the accompanying Ferrybank-Belview Local Transport Plan (LTP) addresses the need for management of HGV movement and recommends delivery of HGV restrictions on the Abbey Road and Belmont Road in the medium-to-long term in order to improve safety for all road users.</li> <li>3. Future development will be subject to environmental assessment including evaluation of potential air, noise environmental and visual pollution.</li> <li>4. See point 3.</li> <li>5. See point 3.</li> <li>6. See point 1.</li> <li>7. Future development will be subject to infrastructure assessment. This has further been considered within the SCA in the Technical Appendix.</li> </ol>
--	--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			development. I request a thorough assessment of the capacity of existing services.	
77	Mary Condon	Community	<p><b>1</b> Urges the development of a set down/drop off area and car park at St. Mary's Boys' National School on Ross Road, Ferrybank, Waterford, due to safety risks during drop-off and pick-up times. Key issues include unsafe road crossings, children exiting cars onto the main road, and illegal parking. Proposed developments include a designated drop off area, a car park for staff and visitors, and enhanced safety measures.</p>	<p><b>1</b> Noted. The final Plans will identify a requirement to include St Mary's NS under the Safer Routes to School programme. KCC will work with WCCC and St Mary's NS School to examine options to improve safety around drop-off and collection times. This will include improvements to the pedestrian crossing at the junction with Rose Road, improvements to the pedestrian and cycle accessibility to the school and the alignment with the Plan's ambition for a people-centred Belmont Village. <b>KCC will further work with WCCC, HSE and the Department of Education to review if access can be provided to the school from the Primary Health Care car park. No amendment required.</b></p>

### 3 Summary of Recommendations of the Chief Executive

Proposed Variation 6 is to incorporate a Settlement Plan for Ferrybank into the KCCDP, as part of a new Volume 3, Settlement Plans, to make associated changes to Volume 1 to reflect this

I have examined the changes recommended to the Variation, and am satisfied they constitute material modifications under Section 13(6) of the Planning and Development Act, 2000 as amended I recommend that the members resolve to place the material amendments on public display . The amendments will be subject to environmental considerations and assessed for compliance with Appropriate Assessment and Strategic Environmental Assessment in accordance with relevant legislation.

The publication of the material amendments will initiate a minimum 4 -week public consultation period during which, submissions and observations on the material amendments will be invited.



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

## Significant zoning changes to respond to section 28 guidelines and employment zones

