

Chief Executive's Report

Submissions to:

Proposed Variation 8A to Kilkenny City and County
Development Plan 2021

April 2026

Note: Version with minor edits published 22nd April 2026





Kilkenny County Council
2026

Lar Power,
Chief Executive

Tim Butler,
Director of Services

Contents

1.	INTRODUCTION	1
1.1	Proposed Variation	1
1.2	Details of Public Display	1
1.3	Consideration of Variation	2
2.	SUBMISSIONS RECEIVED	3
2.1	Summary of Issues Raised, Chief Executive's Response and Recommendations – Statutory consultees	5
2.2	Summary of Issues Raised, Chief Executive's Response and Recommendations	9
3.	SUMMARY OF RECOMMENDATIONS OF THE CHIEF EXECUTIVE	39

1. Introduction

This report forms part of the statutory procedure for the making of Variation 8A to the Kilkenny City and County Development Plan (KCCDP).

This report addresses the submissions received during the 4-week public consultation period, from the 6th of March to the 3rd of April 2026, in relation to the Proposed Variation.

The purpose of this report is to:

- summarise the written submissions received in relation to the proposed variation during the public consultation period.
- set out the Chief Executive's response to the issues raised in the submissions and;
- make recommendations to the Elected Members on the issues arising from the consultation process.

This report is being furnished to the Elected Members of Kilkenny County Council in accordance with Section 58(11) of the Planning and Development Act 2024, as amended, for their consideration.

1.1 Proposed Variation

Proposed Variation no. 8A is a proposal to change the zoning of land in Kilkenny City, to reflect the requirements of the Government's *National Planning Framework Implementation Guidelines*.

1.2 Details of Public Display

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

- Public Notice
- Proposed Variation
- Appropriate Assessment Screening report
- Strategic Environmental Assessment Screening report

These documents were placed on the consult.kilkenny.ie consultation website and linked from the Council's own website. Hard copies of the documents were on public display at the Planning Office, Kilkenny County Council, County Hall, John Street, Kilkenny.

Submissions could be made:

- Online at consult.kilkenny.ie or,
- In writing to: Senior Planner, Planning, Kilkenny County Council, County Hall, John Street, Kilkenny.

1.3 Consideration of Variation

The members of the planning authority are required to consider the proposed variation and this Chief Executive's Report, and this is to be completed within 6 weeks¹.

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. Make the Proposed Variation

2. Make a modified version of the Proposed Variation

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

If it is resolved to make a modified version of the proposed variation, and the modification constitutes a material alteration to the variation, the variation shall be deemed not to have been made.

Not later than 2 weeks after the passing of the resolution, the Planning Authority shall publish notice of the modification that constitutes a material alteration.

The planning authority must review the alteration in the context of SEA and AA and determine its implications (if any) on the environment. If an SEA or AA is required, the 2-week period may be extended by such period as the CE considers necessary to facilitate any necessary assessments.

Thereafter the Planning Authority must publish notice of the proposed material alteration (and relevant information relating to SEA and AA). A further 4-week period is allowed for public consultation and for lodgement of written submissions.

¹ From the date of the submission of the Chief Executive's report to the members of the Planning Authority

2. Submissions Received

In total, 28 submissions were received to the proposed variation. Below is a list of the submissions received².

Reference	Name
KK-C374-1	Community Campaigner David Barton
KK-C374-2	Ivan Shannon
KK-C374-3	Maritime Area Regulatory Authority (MARA)
KK-C374-4	Martina Pembroke
KK-C374-5	Department of Education and Youth
KK-C374 6	Uisce Eireann
KK-C374-7	David Tynan
KK-C374-8	Ormonde Homes
KK-C374-9	Kilkenny Golf Club
KK-C374-10	Dracotview Unlimited Company
KK-C374-11	Office of Public Works (OPW)
KK-C374-12	Office of Planning Regulator (OPR)
KK-C374-13	Cairn Homes
KK-C374-14	Bluett & O'Donoghue
KK-C374-15	Estate of the late Mary Fitzgerald
KK-C374-16	Wallace contracting
KK-C374-17	Buttstown Team Community Group
KK-C374-18	Shane and Eoin Phelan
KK-C374-19	Mary Fitzgerald & Jacinta Fitzgerald
KK-C374-20	Mark and Pat Cantwell
KK-C374-21	Electricity Supply Board (ESB)
KK-C374-22	National Transport Authority
KK374-C23	Clancy Homes
KK-374-C24	Nichola Clancy
KK-374-C25	Carrol Family and John Cleere
KK-374-C26	Reginald Brennan
KK-374-C27	John Murphy
KK-374-C28	Board of Saint Canice's Community Action CLG

² The full text of the submissions received is available to view at the following link: <https://consult.kilkenny.ie/en/node/7357/submissions>

Chief Executive's Report on submissions to Proposed Variation 8A to KCCDP

To comply with reporting procedure in the legislation, the submissions are dealt with in order from the Office of the Planning Regulator (OPR) and the National Transport authority (NTA).

2.1 Summary of Issues Raised, Chief Executive's Response and Recommendations – Statutory consultees

Ref. KK- -C374- 12 Office of the Planning Regulator (OPR)	
Summary	Response and Recommendation:
<p>The submission includes one observation.</p> <p>The proposed Variation includes a number of changes to the City and County Development Plan including,</p> <ul style="list-style-type: none"> • amendments to the core strategy • policy amendments including zoning objectives and development requirements • proposed rezoning of lands to facilitate additional residential development. <p>It considers that both Policy and Objective 1 and 2 of the Housing Growth Guidelines are achieved by the proposed Variation and provides a clear direction for housing delivery in Kilkenny City.</p> <p>The observation is to provide a strategic level input to the Planning Authority under flood risk management in finalising the proposed Variation</p> <p>Observation</p> <p>The Planning to (i) take account of potential climate change risks and associated mitigation measures, in relation to sites SR5 Loughmacask, SR6 Breagagh Valley, OS1 The Butts and NC1 Breagagh Valley and outline how potential future risk has been considered; and</p> <p>(ii) incorporate integrated and area-based provision of Sustainable urban Drainage Systems and green</p>	<p>The commentary that the requirements of both Policy and Objective 1 and 2 of the Housing Growth Guidelines are achieved by the proposed Variation is welcomed.</p> <p>Observation</p> <p>(i) Climate change is dealt with in an overarching sense in Chapter 2 of the City & County Development Plan. Climate change and flood resilience is dealt with in Section 2.4.3 P16 therein which identifies that a requirement that a Flood Risk Assessment is carried out for any development proposal, where flood risk may be an issue and in Chapter 10 (10.2.6.1 Flood Management) it is outlined how the Council policy adopts a comprehensive risk based planning approach to flood management to prevent and minimise flood risk. Under this section it is a requirement that a detailed flood risk assessment should be carried out appropriate to the scale and nature of the development and the risks</p>

<p>infrastructure to key development sites in order to avoid reliance on individual site by site solutions.</p>	<p>arising. In particular, any area within or adjoining flood zone A or B, or flood risk area.</p> <p>As part of Variation 4 (adopted 26/2/26) section 10.2.8 requires that all planning applications for development shall include integrated provisions for nature-based rainwater management (NBS), appropriate to the scale and context of the development proposed. In this context (requirement for nature-based solutions and location of sites outside of flood zone A & B it is considered that the potential for climate change risks and associated mitigation measures, in relation to sites have been taken into account in the policies of the development plan.</p> <p>ii) The Council is preparing a rainwater management plan for Kilkenny City which will be a strategic plan-led appraisal of the city which will identify preferred NBS measures and interventions for managing rainwater and surface water runoff. It will prioritise NbS to mitigate flood and pollution risks, whilst enhancing the urban environment through enhanced provision of amenity and biodiversity. The production of the Rainwater Management Plan will identify climate adaptation measures and interventions for the city, which can contribute to climate resilience of the river catchments and will help the Council to achieve actions and objectives contained within its Climate Action Plan and Biodiversity Action Plan and the River basin Management Plan. This work is currently ongoing.</p>
---	--

KK-C374-22 National Transport Authority	
Summary	Response:
<p>The NTA supportive of the proposed approach to ensuring the zoning of an adequate quantum of land for the delivery of the housing units set out in the NPF First Revision.</p> <p>1. The NTA recommends that the planning authority should clarify the basis for the quantum of zoned lands in excess of the 52.2 ha. required to accord with the Section 28 Guidelines.</p> <p>2. The NTA recommends that the subject zonings if approved should inform the finalisation of the SUMP, in order to ensure compliance with national and regional policy (e.g. NSO 5 Sustainable Mobility; NSO 8 Transition to a Carbon Neutral and Climate Resilient Society)</p>	<p>1. The basis of the additional zoning over and above the 52.2 ha is contained in the guidance under the implementation Guidelines issued to Planning Authorities. The Guidelines provide that an additional provision of 50% over and above the housing growth requirements is reflected in the relevant County Development Plan.</p> <p>The Draft Variation proposed a total of 79 hectares of Strategic Reserve land to new residential which represents a headroom of greater than 50%³.</p> <p>This is considered appropriate for the Key Town of Kilkenny, which has provided a successful, plan-led approach to neighbourhood development over consecutive Development Plan periods. The proposed zoning includes qualifying criteria to ensure land is activated on a sequential basis, in particular having regard to the neighbourhood creation aspects of the Loughmacask and the Breaghagh Valley areas and the provisions of the emerging SUMP.</p> <p>2. The emerging SUMP has taken into account the proposed zoning in this variation.</p>
<p>Recommendation:</p> <p>No change recommended.</p>	

³ 52.2 hectares x 50% = 26.1 (52.2 + 26.1 = 78.3 hectares)

Ref. KK- C353-3 The Maritime Area Regulatory Authority (MARA)	
Summary	Response:
The Marine Area Regulatory Authority is satisfied that the proposed variation 8A will not directly interact with or impact on, the maritime area. MARA have no further comment.	The contents of the submission are noted.
Recommendation: No change recommended.	

2.2 Summary of Issues Raised, Chief Executive's Response and Recommendations

Ref	Name	Summary
KK-C374-1	David Barton	This submission makes various references regarding heritage and conservation, including Conservation Area Appraisal(s), Scoping Document(s), Local Plan, Supplementary Planning Document(s), Design Codes, Designated & Non-Designated Heritage Assets, Conservation Areas, Climate Change, Historic Buildings, Traditional Vernacular Architecture
<p>Response:</p> <p>This submission does not raise any specific issues in relation to the areas under consideration for rezoning but instead relates to high level policies and objectives (many of which relate to the UK context and not Ireland). Relevant heritage issues should be addressed to the review of the Development Plan, or Heritage Plan.</p>		
<p>Recommendation: No change to the proposed Variation.</p>		

Ref	Name	Summary
KK-C374-2	Ivan Shannon	<p>This submission seeks a change in zoning from amenity to residential for lands at the entrance to Robertshill as the land:</p> <ul style="list-style-type: none"> • has the necessary services, and • has potential for immediate construction
<p>Response:</p> <p>The purpose of this Variation is to reflect the requirements of the Government's <i>National Planning Framework Implementation Guidelines</i>.</p> <p>No map was submitted with this, however the submission states "<i>lands on the left-hand side of the entrance of Robertshill</i>". From this description, it appears that the land referred to is a greenfield site, located within Flood Zone A, as identified in Figure 23b of the <i>Strategic Flood Risk Assessment</i> of the Kilkenny City and County Development Plan 2021, see extract below. This site would not pass the plan-making Justification Test of the Flood Risk Assessment Guidelines. Sufficient land has been provided under the Proposed Variation to accommodate the</p>		

revised housing growth figures. This site should retain its amenity/open space zoning.

Extract from Figure 23b of the *Strategic Flood Risk Assessment* of the Kilkenny City and County Development Plan 2021



Recommendation: No change to the proposed Variation.

Ref	Name	Summary
KK-C374-4	Martina Pembroke	<p>The submission suggests two zoning changes to land in Loughmacask as follows;</p> <ol style="list-style-type: none"> 1. A greenbelt on both sides of the Loughmacask link road (connecting to the CBC school). 2. A change from Open Space to Low Density residential to the west of the link road.
<p>Response:</p> <p>No map was submitted, however an extract from the Proposed zoning map is included below.</p> <ol style="list-style-type: none"> 1. The Loughmacask link road is bounded to the east by New Residential zoning. The optimal interface between any development proposal and the road at that location can be addressed as part of any planning application on that site. 2. The open space zoning at this location provides a corridor of undeveloped land, connecting the Loughmacask Natural Heritage Area (NHA) to the north. 		

Networks of interconnected green spaces are vital to conserve biodiversity and provide ecosystem services to people.

The purpose of this Variation is to reflect the requirements of the Government's *National Planning Framework Implementation Guidelines*. Sufficient land has been provided under the Proposed Variation to accommodate the revised housing growth figures. This site should retain its amenity/open space zoning.



Recommendation: No change to the proposed Variation.

Ref. KK- C353-5 Department of Education and Youth

Summary

Dept considered and notes the reason for the variation.

1. Schools are enabling infrastructure for housing and as such, schools should be positioned in the heart of new and expanding sustainable communities, allowing for the maximum benefit to the community inside and =outside school hours. Other community facilities and amenities should also be positioned close to school facilities

Response:

1. The commentary is noted and agreed. Schools are considered enabling infrastructure for housing and should be located close to other community facilities and amenities. KCC has developed a plan led approach to the location of new schools in the city as evidenced by the

<p>to allow for all community facilities be complimentary to each other for the benefit of the whole community. in relation to other aspects of the draft variation, the department notes the proposed new reference in section 2.2.3 Breagagh Valley relating to permissions for two secondary schools and outline permission for a primary school.</p> <p>2. All enabling infrastructure required to develop and operate school facilities should be provided in advance of the need for such schools. This infrastructure includes road, electricity, water infrastructure, sustainable transport links, active travel networks, road safety measures and safe routes to school facilities.</p> <p>3. In the context of this Settlement Plan and being mindful of a substantial population growth that may arise from the various future planned housing developments within Kilkenny City and its surrounds, the department would welcome explicit support within the plan for the provision of school accommodation for children and young people with special educational needs</p>	<p>Breagagh Valley masterplan and the Loughmcask masterplan.</p> <p>2. Noted. The proposed variation which includes green field lands which require qualifying criteria to ensure land is activated on a sequential basis, in particular having regard to the neighbourhood creation aspects of the Loughmacask and the Breagagh Valley areas.</p> <p>3. In chapter 6 of the City & County Development Plan specific reference is made to the need for educational facilities as the need arises in line with the 2008 guidelines and liaising with the Department. No specific need to refer to special needs in this variation as it is adequately covered in Chapter 6.</p>
<p>Recommendation: No change recommended.</p>	


Ref	Name	Summary
KK-C374-6	Uisce Eireann	<p>UE welcomes opportunity to comment on the variation.</p> <ol style="list-style-type: none"> 1. The proposal is to zone an additional 79 ha, but no population target has been provided. Uisce Eireann relies on population figures to assess future capacity. 2. the proposed variation core strategy goes beyond the Uisce Eireann Capital investment Plan (2025- 2029) 3. Level of capacity will need to be revisited should significantly demand for water services be experienced.
<p>Response:</p> <ol style="list-style-type: none"> 1. The targets are set out in housing units in the table. However, it is noted that an average household size of 2.78 persons per household is used to estimate population. 2. The duration of the Capital programme is noted up to 2029. It is not anticipated that significant investment by UE will be required over the Plan period given the rate of growth within the city. 3. The Development Plan review post to commence post 2026 will provide a further opportunity to review and assess. 		
<p>Recommendation: No change to the proposed Variation.</p>		

Ref	Name	Summary
KK-C374-7	David Tynan	<p>Concerns raised about the design of the layout for new housing overlooking the amenity area of the Butts. The concern is that the amenity area should not be reduced in size to accommodate housing.</p>
<p>Response:</p> <p>The design of the housing will be subject to its own consultation and consent process where such issued can be detailed and addressed.</p>		
<p>Recommendation: No change to the proposed Variation.</p>		

Ref	Name	Summary
KK-C374-8	Ormonde Homes	<p>A detailed submission seeking the inclusion of the lands owned by Ormonde Homes within the immediate phasing of lands for the Breagagh Valley based on the availability of existing services along the Kilmanagh road.</p> <p>1. Loughmacask.</p> <p>Potential restrictions to Development in Loughmacask are highlighted due to objective R7.</p> <p>The submission ignores objective R13 which allows for other satisfactory Road Infrastructure to be in place or has a clear timeframe for delivery. Permission was recently granted under ref 2560557 which is a permission for an additional 32 housing units which includes for vehicular and pedestrian connection, roadway, and shared cycle and footpaths through the Bishops Lough housing development from the existing entrance off the Bonnettstown / Tullaroan Road. The Council have agreed to purchase the houses and part fund the road. It will provide the connection desired to fulfil R7 in the short term and allow for additional housing onto the Tullaroan road.</p> <p>2. New Orchard Road A large portion of land here is commercial and actively farmed. Not clear if any land will become available for housing.</p> <p>3. In conclusion the submission looks for objective Z20 to be omitted from the variation such that planning permission can proceed without the use of the neighbourhood park being developed.</p> <p>4. The submission also seeks objective Z21 to be amended to such that planning permission for development of Parcel B can be considered</p>

		without restrictions associated with development of Parcels C, E or F.
<p>Response:</p> <ol style="list-style-type: none"> 1. The submission ignores objective R13 which allows for other satisfactory Road Infrastructure to be in place or has a clear timeframe for delivery. Permission was recently granted under ref 2560557 which is a permission for an additional 32 housing units which includes for vehicular and pedestrian connection, roadway, and shared cycle and footpaths through the Bishops Lough housing development from the existing entrance off the Bonnettstown / Tullaroan Road. The Council have agreed to purchase the houses and part fund the road. It will provide the connection desired to fulfil R7 in the short term and allow for additional housing onto the Tullaroan road. 2. New Orchard. In the proposed variation a total of 10.3⁴ ha was proposed to be rezoned from Strategic Reserve to New Residential. One submission requested a reversal of the zoning (2ha see KK-C374-18) and one submission identified 0.8ha for uses associated with the existing public house. (KK-C374-27) Of the 10.3 ha proposed 2.8 will not go to housing; 7.5 ha will remain zoned for housing. 3. Kilkenny County Council are in discussions with a landowner for the delivery of a substantial portion of the overall park area. It is intended that these discussions will lead to the purchase and development of the park area under the control of the Council. 		
<p>Recommendation:</p> <p>Amend objective Z20 to read as follows in <i>red text</i>:</p> <p>No further residential units can be occupied in Parcels A, B, C, D, E or F until recreational use of the identified Neighbourhood Park has commenced</p> <p><i>Z20: It is an objective of the Council to provide recreational facilities in the area identified for the neighbourhood park in tandem with housing delivery in parcels B, C, E and F.</i></p> <p>Amend objective Z21 to read as follows: with the omission of parcel B.</p> <p>Planning permissions for residential developments will not be considered in Parcels A, B or D until planning permission has been granted for residential use in at least one of Parcels B, C, E or F.</p>		

⁴ 10.3 ha in sites SR2 & SR 3 in SFRA section 1.1

Ref	Name	Summary
<p>KK-C374-9</p>	<p>Kilkenny Golf Club</p>	<p>The submission outlines the landholding for Kilkenny Golf Club broken into Parcel A & B.</p>  <p>Map extract from submission.</p> <p>Zoning of Parcel A generally supported but highlights the potential for parcel A to be land locked.</p> <p>Parcel B zoning is not supported, and it is requested that Parcel B remain as strategic reserve as it forms part of plan for the development of extra golf facilities into the future.</p>
<p>Response:</p> <p>Under planning application ref 2560638 permission has been sought for the development of 50 residential units. Further information was requested and a response is awaited. The issue of access to the lands identified as strategic reserve (parcel A) is requested to be addressed as part of any response. It is considered therefore that parcel can remain as new residential.</p> <p>In relation to parcel B given that plans for additional golf club facilities are well advanced it is recommended that parcel B remain as strategic reserve.</p>		
<p>Recommendation:</p> <p>Revert parcel B identified in the submission back to strategic reserve as per the current City & County Development Plan.</p>		

Ref	Name	Summary
KK-C374-10	Dracotview Unlimited Company	The submission seeks the rezoning of 31.4 ha (77acres) of land located between the R712 (old Dublin Road and the N10 (motorway link) from Business Park to New Residential.
<p>Response:</p> <p>The lands are not well served by community or social facilities such as schools or services for 33ha of housing. Nor are such facilities planned at this location.</p> <p>The zoning would not support compact growth and would inevitably lead to car-based commuting to access education, sporting and commercial facilities notwithstanding that there is limited such facilities at Cillian Hill.</p> <p>The lands zoned form part of the 4-neighbourhood concept which the strategic development of the city has been predicated on since 2008. The proposed zoning would be contrary to that strategic aim.</p>		
<p>Recommendation: No change to the proposed Variation.</p>		

Ref	Name	Summary
KK-C374-11	Office of Public Works	<p>The OPW make an observation that although the flood risk assessment does not identify lands in flood zone A or B that there could still be a risk of flooding</p> <p>Flood Mapping produced under the National CFRAM Programme is currently under review in the Breagagh area. The OPW requests that the Council note that the mapping in this area may change as part of the review process.</p> <p>Sites SR5 (Loughmacask), SR6 (Breagagh Valley), OS1 (The Butts) and NC1 (Breagagh Valley) are all located adjacent to areas identified as at risk of flooding in the County Development Plan SFRA, for which there are no future scenario extents available. Further discussion as to how potential future risk to these areas has been considered may be appropriate.</p>
<p>Response:</p> <p>Climate change is dealt with in an overarching sense in Chapter 2 of the City & County Development Plan. Climate change and flood resilience is dealt with in Section 2.4.3 P16 therein which identifies that a requirement that a Flood Risk Assessment is carried out for any development proposal, where flood risk may be</p>		

an issue and in Chapter 10 (10.2.6.1 Flood Management) it is outlined how the Council policy adopts a comprehensive risk based planning approach to flood management to prevent and minimise flood risk. Under this section it is a requirement that a detailed flood risk assessment should be carried out appropriate to the scale and nature of the development and the risks arising. In particular, any area within or adjoining flood zone A or B, or flood risk area.

As part of Variation 4 (adopted 26/2/26) section 10.2.8 requires that all planning applications for development shall include integrated provisions for nature-based rainwater management (NBS), appropriate to the scale and context of the development proposed. In this context (requirement for nature-based solutions and location of sites outside of flood zone A & B it is considered that the potential for climate change risks and associated mitigation measures, in relation to sites have been taken into account in the policies of the Development Plan.

ii) The Council is preparing a rainwater management plan for Kilkenny City which will be a strategic plan-led appraisal of the city which will identify preferred NBS measures and interventions for managing rainwater and surface water runoff. It will prioritise NbS to mitigate flood and pollution risks, whilst enhancing the urban environment through enhanced provision of amenity and biodiversity. The production of the Rainwater Management Plan will identify climate adaption measures and interventions for the city, which can contribute to climate resilience of the river catchments and will help the Council to achieve actions and objectives contained within its Climate Action Plan and Biodiversity Action Plan and the River basin Management Plan. This work is currently ongoing.

Recommendation: No change to the proposed Variation.

Ref	Name	Summary
KK-C374-13	Cairn Homes	<p>Cairn Homes welcome the publication of the proposed Variation no. 8A and support the need for the increased core strategy numbers to guide the future development of the County, in the short term.</p> <ol style="list-style-type: none"> 1. The submission notes that, through the allocation of c. 79 ha of newly zoned residential lands, the planning authority have accounted for an uplift of c. 22% over and above the revised annual housing growth target (i.e. additional 27 ha of proposed new residential zoned lands [over and above the c 52ha requirement]). 2. Cairn Homes Properties Ltd. are significant landowners in this area and are of the opinion that they are well placed to secure the delivery of

		<p>much-needed housing for the area at scale in the near future. Cairn own lands namely within Parcel F of the Breagagh Valley Framework and are currently active in progressing towards a planning application for a large-scale residential development in the area in tandem with public open spaces including parks and a neighbourhood centre, in accordance with the current development framework for the area. The proposed overarching objectives for the area, as set out above, in relation to the protection of hedgerows, rainwater management and site boundaries and access arrangements, are considered appropriate and will contribute to the proper planning and sustainable development of the area going forward. It is requested that a legend be attached to Figure CS3a to ensure that the proposed indicative road layout and access arrangements are appropriately clarified.</p> <p>3. Additional flexibility in Table 2.3 is sought with the addition of text set out in red as follows:</p> <ul style="list-style-type: none"> • Medium density housing (40-50dph) accessed from the south and/or north • The identified Neighbourhood Park (2 hectares) must be delivered commenced in tandem with, houses or prior to, the occupation of residential units' development, see Z20 • Vehicle access from Poulgour Road (the L6870) is not permitted to the L6695 (west of the Neighbourhood park), unless appropriate upgrades to the Poulgour Road (the L6870) are completed in agreement with the Council. • At least one pedestrian crossing point should be facilitated between the southern and northern portions of the Neighbourhood Park as part of the development which completes the park provision and/or any upgrades to the Poulgour Road (the L6870). • Development within the Neighbourhood Centre zoning should include active ground floors with residential/ non-residential uses above as/if appropriate having regard to the commercial viability of the neighbourhood centre."
--	--	--

Response:

Welcome of plan noted.


1. It is correct that under the revised NPF C52 ha is required to meet the demand allocated under the NPF. The Draft proposed to zone 79ha of land which is 27ha above the actual requirement giving a headroom of an extra 52% not 22 % as stated in the submission.
2. A legend will be attached to Figure CS3a to ensure that the proposed indicative road layout and access arrangements are appropriately clarified.
3. Amend requirements for Parcel F in Table 2.3 to ensure commencement of the park in tandem with the development and its completion after 60% of the houses are occupied. Omit the word "above" from bullet point 5 in No. 3 above.
Allow for vehicular access from the L6870 west and east of the park area.


Recommendation:

Change text in Parcel F Table 2.3 as follows:

- The identified Neighbourhood Park (2 hectares) must be ~~delivered~~ *commenced* in tandem with ~~or prior to, development~~ *the development and completed prior to, the occupation of 60% of residential units*, see Z20.
- Vehicle access from Poulgour Road (the L6870) is ~~not permitted to the L6695 (west~~ *and east* of the Neighbourhood park) ~~only~~⁵.
- Provide a legend to Figure CS3a
- Change bullet point to read as follows:
- Development within the Neighbourhood Centre zoning should include active ground floors with residential/ non-residential uses ~~above~~ as appropriate.

⁵ (No vehicular access through the Neighbourhood Park along the Poulgour Road.)

Ref	Name	Summary
<p>KK-C374-14</p>	<p>Bluett & O'Donoghue on behalf of Ger O'Brien</p>	<p>The submission seeks the rezoning of approx. 2.4 ha of land from agriculture to housing.</p>  <ol style="list-style-type: none"> 1. Current agricultural zoning is incompatible with the site's location adjacent to large housing developments and new school. 2. The site has wastewater services and is located adjacent to Loughmacask Local Area and along key Pedestrian and Cycle routes proposed. It is accessible from the Dunningstown road. 3. The lands are adjacent to community facilities such as schools and hospital. subject site under the same criteria that Kilkenny County Council devised. We have demonstrated how it compares to other sites that are proposed to be included as New Residential zoning in the proposed variation. The subject site compares equally well as other sites in terms of Infrastructure & Services, Compact Growth and Physical Suitability.
<p>Response: The lands are on the periphery of the existing built-up area outside any of the existing neighbourhoods and would result in a piecemeal approach to the expansion of the existing urban area.</p> <p>No change recommended.</p>		
<p>Recommendation: No change to the proposed Variation.</p>		

Ref	Name	Summary
<p>KK-C374-15</p>	<p>Estate of the late Mary P. Fitzgerald</p>	<p>Seeks the zoning of 9.5 ha of land from agriculture to residential. Located off the N76.</p>  <ol style="list-style-type: none"> 1. None of the proposed lands in the Breagh valley can be deemed to be serviced but it also acknowledges that parcel C can be serviced. 2. It identifies that 20ha of lands at Loughmacask cannot be developed until road objective R7 is realised which <i>“is only now at preliminary public consultation stage”</i> 3. 2.2 ha of land at New Orchard is in active recreational use. 4. No available low-density land available within the city. 5. Service connections are available and is in close proximity to every amenity in the city. It is requested that the land identified be zoned for New Low-Density Residential development (15-30 Units/ ha) or a mix of New Low-Density Residential and New Residential zoning (35 -50 units/ ha). Also, that the land on which the recreational sports field is proposed, be zoned for ‘Community Facilities’

Response:

1. The lands in the Breagh Valley are serviceable. Blocks F, C, E and now also B are readily serviceable being adjacent to existing infrastructure roads, water, telecoms etc. The development of these parcels also linked to the delivery of recreation and community facilities all of which located with the concept of the walkable neighbourhood. (Planning applications at advanced stages from two developers on block B & F for in excess of 300 houses.)
2. The submission ignores objective R13 which allows for other satisfactory Road Infrastructure to be in place or has a clear timeframe for delivery. Permission was recently granted under ref 2560557 which is a permission for an additional 32 housing units which includes for vehicular and pedestrian connection, roadway, and shared cycle and footpaths through the Bishops Lough housing development from the existing entrance off the Bonnettstown / Tullaroan Road. The Council have agreed to purchase the houses and part fund the road. It will provide the connection desired to fulfil R7 in the short term and allow for additional housing onto the Tullaroan road. Therefore, it is incorrect to say 20ha not serviced. The full extent of the lands in Loughmacask can now be serviced.
3. New Orchard: In the proposed variation a total of 10.3⁶ ha was proposed to be rezoned from Strategic Reserve to New Residential. One submission requested a reversal of the zoning (2ha see KK-C374-18) and one submission identified 0.8ha for uses associated with the existing public house. (KK-C374-27) Of the 10.3 ha proposed 2.8 will not go to housing; 7.5 ha will remain zoned for housing.
4. Low density zoning is available along the Sion Road having regard to the character and scale of development at that location. A significant site at that location is still available (min 3.8ha) for development (current application 2560456 on further information). It should also be noted that within the existing built up area low density can be compatible with the overall density. There are numerous examples around the city such as (20/925, 2560271, 14990033, 2560557) all of which are low density in the context of Kilkenny city. It is also possible to have a range of densities across development areas to satisfy different tenures and housing requirements in accordance with the Council's housing strategy.
5. The zoning of the lands at this location are premature notwithstanding the availability of engineering services. The lands are not conveniently located to social and recreational services contrary to the submission detail. The lands are isolated and remote from the city and wider services relatively speaking and would offer limited sustainable connectivity. This is contrast to the planned connectivity to the Loughmacask and Breagh Valley planned areas. Having regard to the scale of the zoning request and other zoning requests in the immediate vicinity it is recommended that the zoning request be refused.

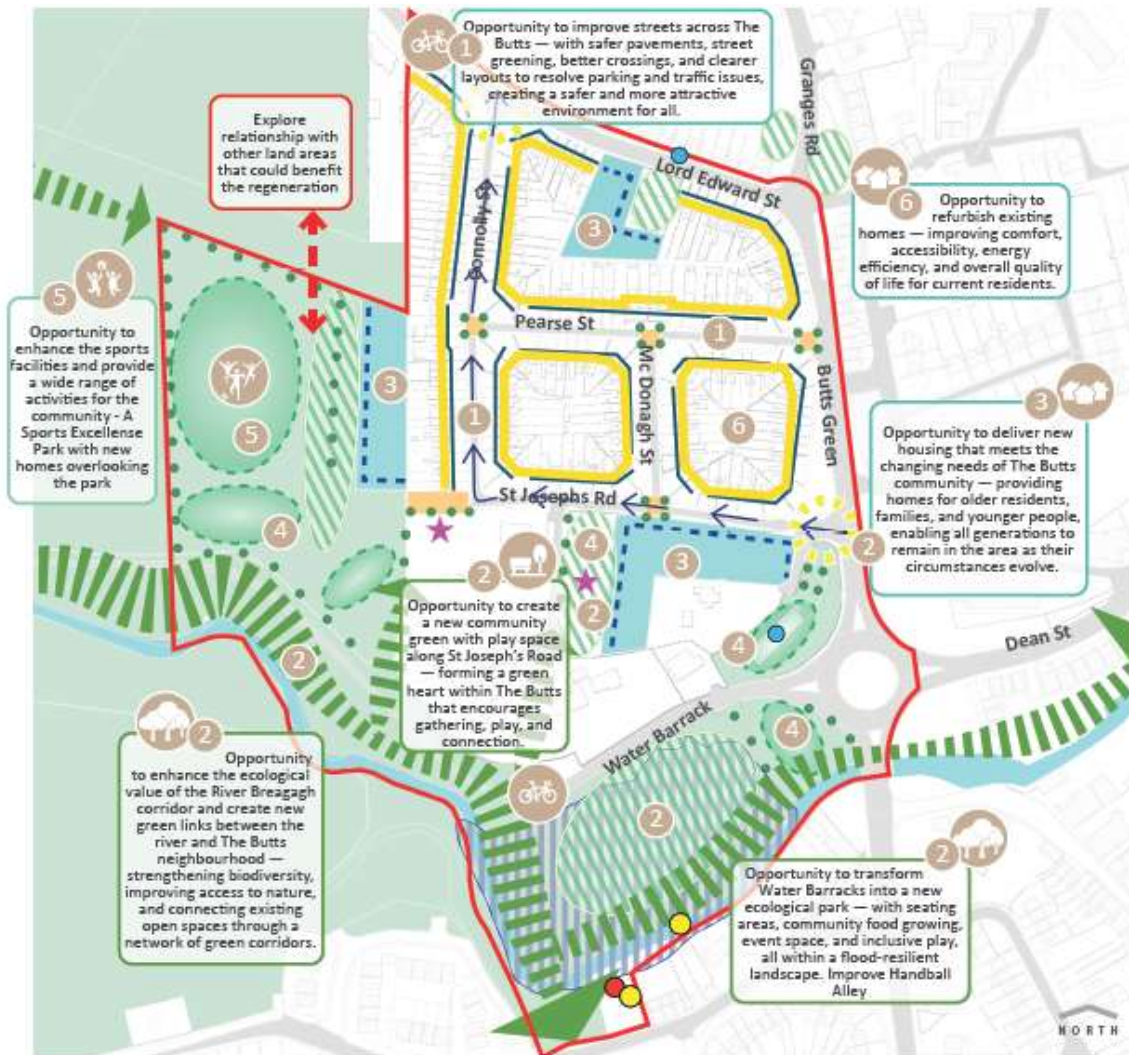
⁶ 10.3 ha in sites SR2 & SR 3 in SFRA section 1.1

Recommendation: No change to the proposed Variation.

Ref	Name	Summary
KK-C374-16	Wallace Contracting	<p>The submission relates to lands currently zoned Amenity / Green Links in the CDP 2021-2027 and no alteration is proposed under Variation 8A.</p> <p>The lands are subject to Seveso Assessment on the Grassland Fertilisers Facility.</p> <p>The submission seeks for the inclusion of an Objective within Variation 8A that the subject lands will be considered for Residential Zoning in line with three revised risk zones (Inner, Middle and Outer Zone) as determined in their Consultant's Report as prepared in 2022 and which accompanies the submission.</p> <p>The current risk-based approach to land use planning near hazardous installations has been updated since the HSA last provided advice on the matter to Kilkenny County Council as part of the 2008 Loughmacask LAP preparation. The updated advice is detailed in the Health and Safety Authority's Guidance on technical land-use planning advice for planning authorities and COMAH establishment operators (HSA, 2021)</p>
<p>Response: The HSA is the statutory authority for advice in relation to the implementation of technical land-use planning advice for planning authorities and COMAH establishment operators (HSA, 2021).</p>		
<p>Recommendation: No change to the proposed Variation.</p>		

Ref	Name	Summary
KK-C374-17	Buttstown Team Community Group	<p>Strong objection to the proposed rezoning of lands that include the established public park located behind Connolly Street in the Butts community.</p> <p>Recent developments have placed substantial strain on local infrastructure particularly traffic congestion and overall quality of life for residents.</p> <p>The public park in question holds significant value for the community representing an important local amenity and commitment to the area.</p>

As part of the recommendations the location of housing to the rear of Connolly St. was identified to solve that problem along with enhanced recreational facilities.



KEY

- Site boundary (TBC)
- Public spaces
- Sports facilities
- ★ Play facilities
- Planting/ trees
- New green routes and links
- Surface changes
- Additional housing
- Potential new buildings frontages
- Improvements to existing housing
- ← One way vehicular traffic route
- New vehicular junctions
- Record of Protected Structures
- National Inventory of Architectural Heritage
- National Monuments Services

2

The Greenfield site behind Connolly Street


- Make existing home more energy efficient and efficiency
- New sports facilities such as a football pitch and a multi-use playing area (MUGA)
- Opportunity for a terrace of new homes overlooking the sports facilities
- Safe recreational routes connecting


Active Living by Design

The Regeneration plan was presented to Kilkenny City MD in July 2025 which gave support to the Regeneration Plan.

The proposed zoning facilitates the overlooking, and the Regeneration plan also seeks the upgrading of the sporting facilities.


Recommendation: No change to the proposed Variation.

Ref	Name	Summary
KK-C374-18	Shane and Eoin Phelan	<p>Variation proposes to zone 5 acres of land (2 ha) as New Residential.</p> <p>The land forms part of the Phelan family farming enterprise.</p> <p>Seeks the omission of the 5 acres (2ha) from the proposed variation.</p> 
<p>Response:</p> <p>As the lands are unlikely to come forward in the life of the current Development Plan and as the quantum of land (2ha) is not significant in the context of the overall lands proposed for New Residential zoning (2% of 79ha) it is considered reasonable not to include this portion of land for New Residential and for it to remain as strategic reserve.</p>		
<p>Recommendation:</p> <p>Retain zoning of Strategic Reserve as per existing Development Plan.</p>		

Ref	Name	Summary
KK-C374-19	Mary & Jacinta Fitzgerald	<p>The submission seeks the zoning of lands at Ardscradaun adjacent to the Ring Road.</p>  <p>It is south of an existing housing scheme currently under development.</p> <p>The land measures approximately 3.6ha (KCC estimate).</p> <p>Reasons to advance zoning are:</p> <ol style="list-style-type: none"> 1. Need for high-quality low-density housing for professional families. 2. Access to services through adjacent development. 3. Within 1 km of the Parade. Clear and has clear and easy access to schools' hospitals and amenities. 4. It was previously included as part of strategic reserve lands in 2014 to 2020 Development Plan. 5. Lands are ready to go due to easy connection to existing scheme.
<p>Response:</p> <ol style="list-style-type: none"> 1. The new residential zoning is not limited by maximum or minimum densities. A design led approach appropriate to the location is taking while trying to achieve an overall density appropriate to Kilkenny City as a Key Town. There are numerous examples in the city where either through infill developments or new schemes lower density housing has been achieved or are proposed. Examples are 2260009, 2560456, 20952, 21252. A mono density across one entire site of this scale is not desirable in the context of City expansion. 2. Engineering services are available in the adjacent housing development under construction. 3. The lands do not have clear and easy access to amenities by way of sustainable transport options. Due to its location bounded on two sites by a national route (the N76) it is private car dominated environment with very poor cycling and walking infrastructure particularly through the existing roundabout on the N76. 4. Areas of Strategic Reserve were indicated on the Zoning Map in the 2014-2020 development plan. The plan stated the following: <i>“These areas will provide for the long-term expansion of the city, following substantial progress being</i> 		

made in the implementation of the Western Environs and Loughmacask areas. Local Area Plans, or appropriate planning framework documents will be prepared for the areas of Strategic Reserve as required in the longer term. The total area of the strategic reserve lands is 262ha" Both Loughmacask and Western Environs (Breaghagh Valley) are in the process of being developed and are in the process of being built out.

Recommendation: No change to the proposed Variation.

Ref	Name	Summary
KK-C374-20	Mark and Pat Cantwell	<ol style="list-style-type: none"> 1. The variation concentrates on the strategic reserve lands and only reflects the planning status quo. It does not meet the intention or spirit of the Minister 2. Much of the land will not produce housing in the short term 3. Lands outside of those in strategic reserve have not been included even though they can deliver housing.  <ol style="list-style-type: none"> 4. Seeking the zoning of 3.8ha of lands for residential use. All services are available on the adjacent construction site. Were included in strategic reserve lands in 2014 to 2020 plan. 5. Are within the ten-minute city concept.


Response:

1. Yes, there is sufficient strategic reserve lands to meet the allocated targets all within existing planned neighbourhoods or within the existing built-up footprint of the City without extending out to greenfield lands. 52ha is required to meet the target. The Draft Variation proposed a total of 79 hectares of Strategic Reserve land to new residential which represents a headroom of greater than 50%.
In that context the variation not only meets the intention and spirit of the minister but exceeds it.
2. On the basis of existing pre-plannings alone it is anticipated that three planning applications will be lodged with the Council in the short term with provision for in excess of 400 houses. There is a continuation of housing

<p>schemes currently under construction including the adjacent site to these lands. New houses will be delivered following this variation.</p> <p>3. Identifying lands as strategic reserve indicates to landowners and developers the longer-term direction in which development will take place, Lands outside of strategic reserve are unsuitable for development at this time due to the expansion of housing into unplanned and uncoordinated areas outside of existing planned neighbourhoods notwithstanding that they may be serviceable by engineering services.</p> <p>4. Areas of Strategic Reserve were included on the Zoning Map 2014 to 2020 plan. The relevant text is: <i>“These areas were identified to provide for the long-term expansion of the city, following substantial progress being made in the implementation of the Western Environs and Loughmacask areas. Local Area Plans, or appropriate planning framework documents will be prepared for the areas of Strategic Reserve as required in the longer term. The total area of the strategic reserve lands is 262ha”</i> The implementation of the two masterplan areas continues but they have not been substantially complete. For the next Development Plan it will be necessary to identify strategic expansion of the city into those areas identified in 2014.</p>
<p>Recommendation: No change recommended.</p>

Ref	Name	Summary
KK-C374-21	ESB Networks	<p>Welcomes this opportunity to make a submission to Proposed Variation No. 8A</p> <p>Outlines the overview of ESB Networks strategy and its commitment to expanding the electricity network capacity across Ireland to meet the demands of a growing population, accelerated housing development, industrial growth, and national climate objectives.</p> <p>ESB strongly advocates for the explicit inclusion of provisions for Public Service Installations within the Land Use Zoning objectives. The inclusion of substations and associated facilities within zoning objectives ensures their long-term viability, enables the timely delivery of necessary upgrades, and underpins the provision of reliable and resilient electricity supplies to both existing and future communities.</p>
<p>Response:</p> <p>Public utility installations are permitted and open for consideration in all of the zoning categories in the current City and County Development Plan.</p>		

Recommendation: No change recommended.

Ref	Name	Summary
KK-C374-23	Clancy Homes	<p>This submission seeks the zoning of 3.8ha of land adjacent to the existing construction site at Fox Meadows. (see submission KK-C374-20).</p>  <p>The rezoning is supported by the following:</p> <p>Foul, surface and potable water and electricity are all available.</p> <p>The lands have been earmarked for development for many years being identified for strategic development in 2014.</p> <p>Lands are immediately adjacent to Loughmacask masterplan area.</p>

Response: The Draft Variation proposed a total of 79 hectares of Strategic Reserve land to New Residential which represents a headroom of greater than 50%. In that context the variation not only meets the intention and spirit of the minister but exceeds it.

On the basis of existing pre-plannings alone it is anticipated that three planning applications will be lodged with the Council in the short term with provision for in excess of 400 houses. There is a continuation of housing schemes currently under construction including the adjacent site to these lands. New houses will be delivered following this variation.

Identifying lands as strategic reserve indicates to landowners and developers the longer-term direction in which development will take place. Lands outside of strategic reserve are unsuitable for development at this time due to the expansion of housing into unplanned and uncoordinated areas outside of existing planned neighbourhoods notwithstanding that they may be serviceable by engineering services.


Areas of Strategic Reserve were included on the Zoning Map 2014 to 2020 plan. The relevant text is: *“These areas were identified to provide for the long-term expansion of the city, following substantial progress being made in the implementation of the Western*

Environs and Loughmacask areas. Local Area Plans, or appropriate planning framework documents will be prepared for the areas of Strategic Reserve as required in the longer term. The total area of the strategic reserve lands is 262ha" The implementation of the two masterplan areas continues but they have not been substantially complete. For the next Development Plan it will be necessary to identify strategic expansion of the city into those areas identified in 2014.

Recommendation: No change recommended

Ref	Name	Summary
KK-C374-24	Nichola Clancy Dunmore	The submission raises concerns with regards to the speed on the main road & the lack of paths & cycling facilities in the area. It also raises the lack of public transport.
Response: Speeding is a traffic enforcement issue and not related to this proposed variation.		
Recommendation: No change recommended.		

Ref	Name	Summary
KK-C374-25	Gittens Murray Architects Ltd on behalf of the O'Carrol Family and John Cleere	The lands are located along the Bennettsbridge road to the rear of the existing service station. There is an objective in the current development plan to prepare a masterplan. A proposed layout is submitted to support a rezoning following discussion with the planning department.


		
<p>Response:</p> <p>Objective Z13 in the current plan requires the development of a masterplan to bring forward the potential for these lands.</p> <p>One meeting took place and no formal agreement on a masterplan has been reached.</p> <p>It is considered that the zoning or indeed a planning application is premature pending the development of a masterplan for the lands.</p> <p>Recommendation: No change recommended.</p>		

Ref	Name	Summary
KK-C374-26	Reginald Brennan	<p>Submission relates to development at Bishops Demesne along the Tullaroan Rd. Not objecting in principle but the infrastructure deficit must be recognised,</p> <p>The submission states that road objective R12 must be in place before significant numbers of new houses can be delivered.</p> <p>A phasing of the lands is required.</p>
<p>Response: In variation 4 road objectives R12 and R13 were added to ensure adequate transport infrastructure would be in place to service future development off the Tullaroan rd.</p> <p>R13 allows for other satisfactory Road Infrastructure to be in place or has a clear timeframe for delivery. Permission was recently granted under ref 2560557 which is a permission for an additional 32 housing units which includes for vehicular and pedestrian connection, roadway, and shared cycle and footpaths through the</p>		

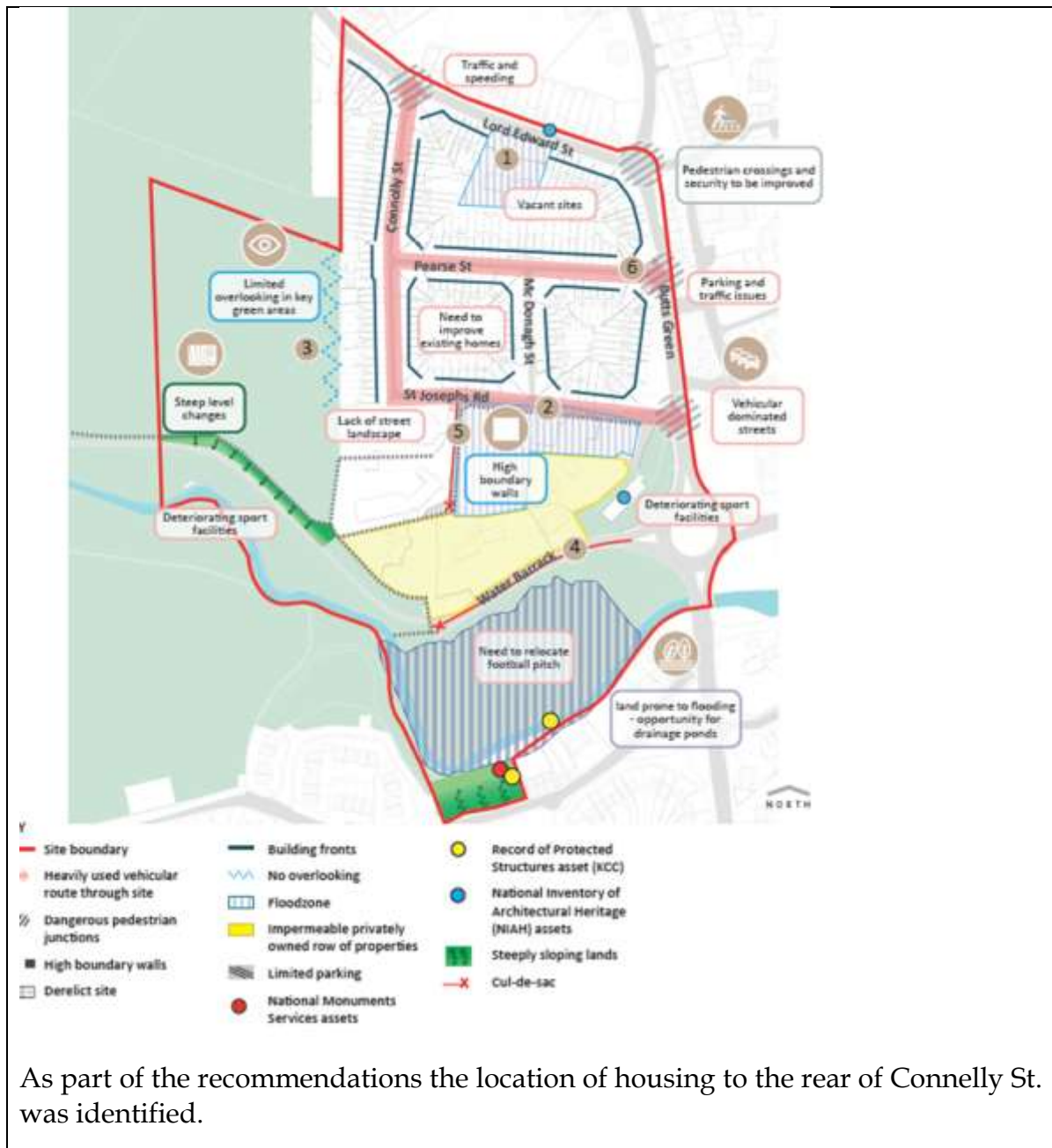
Bishops Lough housing development from the existing entrance off the Bonnettstown / Tullaroan Road. The Council have agreed to purchase the houses and part fund the road. It will provide the connection desired to fulfil R7 in the short term and allow for additional housing onto the Tullaroan road.

In any development the connection from the Tullaroan rd. to the Freshford road must be delivered to facilitate further developments subject to all normal criteria in terms of traffic and other services before permission could be granted. The lands at Bishops Demesne are central to the next phase of development in the Loughmuck masterplan area. A phase plan can be worked through in any planning application(s).

Recommendation: No change recommended.

Ref	Name	Summary
KK-C374-27	John Murphy	<p>The submission is by the owner of the Orchard public house seeking the zoning of 0.8 ha of land adjacent to the public house to enable the development of a campervan park, i.e. commercial purposes.</p> 
<p>Response:</p> <p>The draft variation proposes that the lands are zoned New Residential. Residential use can accommodate a wide range of uses such as tourist accommodation in the form of B & B, hotel etc. provided the impact on amenities of the area is within acceptable limits.</p> <p>Given the context of the adjoining public house which has a commercial zoning and the existing uses in the area the New Residential zoning will not preclude the proposed caravan park.</p>		
<p>Recommendation:</p> <p>No change recommended.</p>		

Ref	Name	Summary
KK-C374-28	Board of Saint Canice's Community Action CLG	<p>Objects to the construction of houses at the rear of houses along Connelly St.</p> <p>The land was earmarked for recreational purposes previously.</p> <p>Seeks to have the housing transferred to the far end (the west).</p>
<p>Response:</p> <p>As part of the Loughmacask Masterplan, Connelly St., Lord Edward St, Pierce St and this open space area was identified as a special regeneration area.</p> <p>Following on from that the Butts Area Regeneration document was prepared with extensive consultation with the local community.</p> <p>One of the challenges from that study was that of overlooking of the green space to the rear of Connelly St.</p>		



As part of the recommendations the location of housing to the rear of Connelly St. was identified.



The Regeneration plan was presented to Kilkenny City MD in July 2025 which gave support to the Regeneration plan.

The proposed zoning facilitates the overlooking, and the Regeneration plan also seeks the upgrading of the sporting facilities.

There are a number of projects that have come forward from the Regeneration project which includes a soccer pitch and other enhanced facilities for the existing open space area which have gone to the Department for funding. The

introduction of the housing brings in an element of passive surveillance which will discourage anti-social behaviour.

Overlooking and residential amenity of existing houses will be addressed at design stage and will require a separate Part 8 process.

Recommendation: No change recommended.

3. Summary of Recommendations of the Chief Executive

The proposed Variation 8A will ensure that 76.2 ha of land will be zoned for residential development, mostly concentrated within the two emerging neighbourhoods of Loughmacask and Breaghagh Valley. These lands are serviced for immediate delivery with planning applications either granted or advanced (pre planning discussion held for in excess of 300 houses and retailing in the Breaghagh Valley alone.)

The Council will take on the delivery of the major open space delivery within the Breaghagh Valley to ensure that recreational facilities are delivered in a timely fashion for the emerging neighbourhood.

I am satisfied that the Proposed Variation as recommended in this report fulfils the intention and spirit and intention of the Minister in terms of housing delivery for Kilkenny city.

I have examined the submissions received and recommend that the Members of Kilkenny County Council adopt Variation no. 8A to the Kilkenny City and County Development Plan 2021 - 2027, with the minor amendments as set out in this report.



Lar Power,

Chief Executive