



## Comhairle Chontae Chill Chainnigh

Halla an Chontae Sraid Eoin Cill Chainnigh  
R95 A39T

Pobail agus Áiteanna Inbhuanaithe a Chruthú

## Kilkenny County Council

County Hall John Street Kilkenny  
R95 A39T



Creating Sustainable Communities and Places

**TO: AN CATHAOIRLEACH  
& EACH MEMBER OF KILKENNY COUNTY COUNCIL**

**RE: LOUGHMACASK MASTERPLAN**

Date: 13<sup>th</sup> June, 2023.

Dear Councillor,

Please find attached Interim Chief Executive's Report in relation to submissions received regarding the Proposed Material Amendments to the Draft Loughmacask Masterplan.

I recommend that the Loughmacask Masterplan be adopted with Material Amendments as proposed.

Yours Sincerely,

**Sean McKeown**  
Interim Chief Executive.

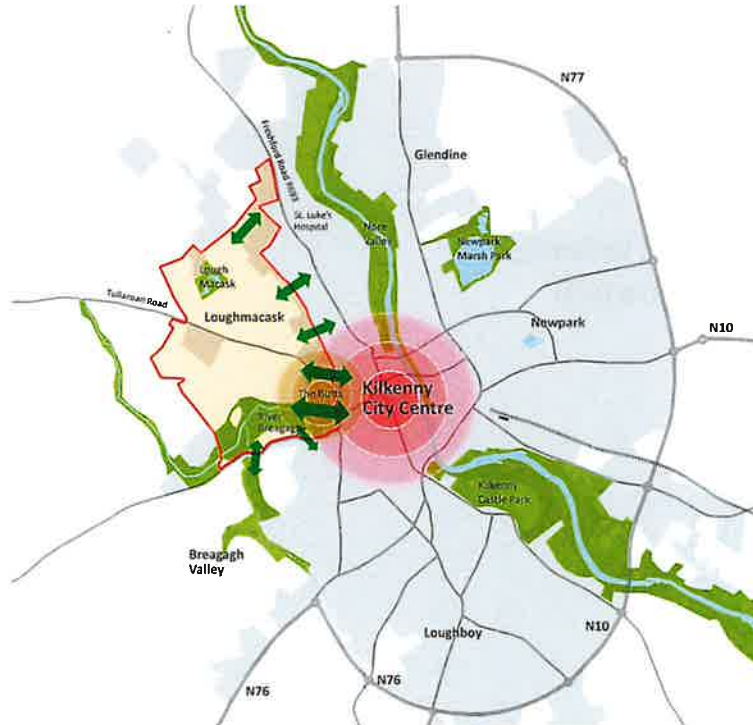
*Encl.*

**Comhairle Chontae Chill Chainnigh  
Kilkenny County Council**



# Interim Chief Executive's Report

## Submissions received regarding Proposed Material Amendments to the Draft Loughmacask Masterplan



June 2023



**Comhairle Chontae Chill Chainnigh  
Kilkenny County Council**

Sean McKeown,  
Interim Chief Executive

Denis Malone,  
A./Director of Services

Nicolaas Louw,  
A./ Senior Planner

## **Contents**

<b>1.</b>	<b>Introduction</b>	<b>4</b>
<b>1.1</b>	<b>Details Of Public Display</b>	<b>4</b>
<b>2.</b>	<b>Submissions Received</b>	<b>5</b>
<b>3.</b>	<b>Summary Of Issues Raised, Interim Chief Executive’s Response And Recommendations</b>	<b>6</b>
<b>3.1</b>	<b>Submissions</b>	<b>6</b>
<b>4.</b>	<b>Next Steps</b>	<b>14</b>
<b>5.</b>	<b>Summary Of Recommendations Of The Interim Chief Executive</b>	<b>15</b>

## **1. Introduction**

This report forms part of the non-statutory procedure for the making of a Masterplan. It addresses the submissions received during the 5-week public consultation period, from the 21<sup>st</sup> of April 2023 to 26<sup>th</sup> of May 2023 in relation to the Proposed Material Amendments to the Draft Loughmacask Masterplan.

The purpose of the report is to:

- (a) Report on the written submissions/observations received during the public consultation period
- (b) Set out the Interim Chief Executive's response to the issues raised in the submissions/observations and
- (a) Make recommendations to the Elected Members on the issues arising from the consultation process.

Although the Masterplan is not a statutory plan, it is brought to the Members for their consideration and approval. Elements of the Masterplan may at a later stage be brought forward into the City and County Plan 2021-2027 by variation and if this is the case, there will be another statutory process for same.

### **1.1 Details of Public Display**

The documents put on public display for the Proposed Material Amendments to the Draft Masterplan for Loughmacask were:

- Proposed Material Amendments to the Draft Loughmacask Masterplan
- Public Notice
- Appropriate Assessment Screening Report of Proposed Amendments
- Strategic Environmental Assessment Screening Report of Proposed Amendments
- Loughmacask Masterplan, Review of Traffic – 2023.

The documents were placed on the [consult.kilkenny.ie](http://consult.kilkenny.ie) consultation website and on the Council's own website. Hard copies of the documents were on public display in the following locations:

- Planning Office, Kilkenny County Council, County Hall, John Street, Kilkenny
- Kilkenny City Library, John's Quay, Kilkenny
- St. Canice's Neighbourhood Hall, 22-28 Butt's Green, Gardens, Kilkenny

Submissions could be made by:

- Email to [ourplan@kilkennycoco.ie](mailto:ourplan@kilkennycoco.ie)
- Online at <http://consult.kilkenny.ie>
- Written submissions to the A./ Senior Planner, Planning Department, Kilkenny County Council, County Hall, John Street, Kilkenny.

## 2. Submissions Received

In total, 3 submissions were received to the Proposed Material Amendments to the Draft Loughmacask Masterplan, as set out below.

No submissions were received from any Statutory Bodies.

<b>Ref.</b>	<b>Name</b>
KK-C213-1	Dicksboro GAA & Camogie Club
KK-C213-2	Caitriona Smith
KK-C213-3	Michael Cullinane

### 3. Summary of Issues Raised, Interim Chief Executive’s Response and Recommendations

#### 3.1 Submissions

Ref	Name
KK-C213-1	Dicksboro GAA & Camogie Club
<p data-bbox="215 405 355 434"><b>Summary:</b></p> <p data-bbox="215 441 1442 551">The submission was prepared by Áine Ryan, Consulting on behalf of Dicksboro GAA &amp; Camogie Club. Clarity is sought regarding the status of current club facilities and likely expansion required to promote / facilitate the sustainable growth of the club.</p> <p data-bbox="215 598 1442 707">Details of the club are outlined including the extent of lands in its ownership, facilities, the date it was established, along with the number of members and teams affiliated with the club. In summary, the submission refers to the following:</p> <ol data-bbox="231 754 1382 1059" style="list-style-type: none"><li>1. Open Space, Playing Pitches north of the club grounds to be provided in tandem with Phase 1 residential development</li><li>2. Provision of additional open space designation adjoining club lands to the south east to facilitate expansion of pitches and walkway</li><li>3. Ensuring cycling / walking connections link with club walkway rather than through playing pitches</li><li>4. Engaging with the club to protect operations and access should the route selection for R7 be a more easterly alignment</li></ol> <p data-bbox="268 1122 1334 1151"><b>1) <u>Open Space to be provided in tandem with Phase 1 residential development</u></b></p> <p data-bbox="316 1158 1404 1308">It is submitted that additional membership and facility demands will be placed on the club to accommodate the projected population arising from new housing development in the area. The club welcomes this and seeks to ready facilities to cater for this growth.</p> <p data-bbox="316 1355 1404 1697">Section 6.3 of the Masterplan is referenced which provides for the potential expansion of the Club on lands (labelled E) to the north of existing pitches and this is welcomed. However, concern is raised regarding the continued use of Pitch No. 2 due to designation of adjoining lands. It is submitted that additional facilities are now required to accommodate demand arising from Phase 1 residential development which is already under construction and within 400m of club grounds. Additional club lands should be provided for within Phase 1 open space development. The full extent of lands requested for inclusion in Phase 1 open space are illustrated (red hatch) in the map extract below:</p>	



**Lands (red hatch) for inclusion in Phase 1 Open Space Designation**

**Proposed Amendment** – *The Planning Authority is thus respectfully requested to amend the Masterplan Phasing structure to incorporate the Dicksboro lands, (situate within the north/south green spine) for Phase 1 development, in order to facilitate the timely provision of active recreational infrastructure to serve the quantum of population associated with the development of medium and high-density residential lands during Phase 1*

**2) Providing for expansion of facilities**

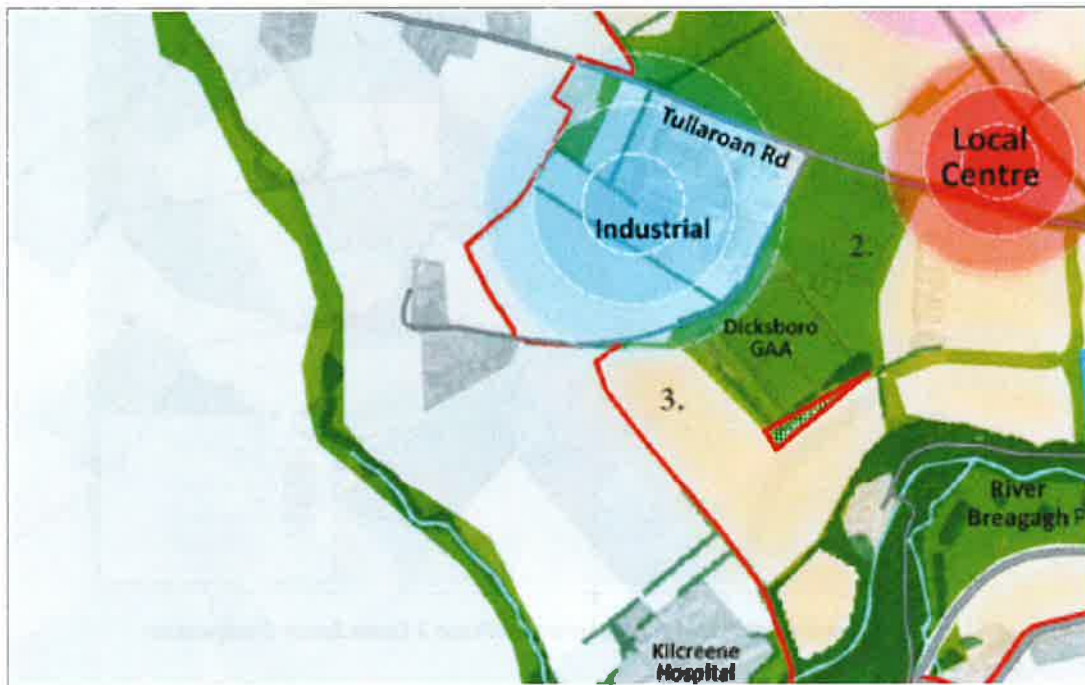
It is stated that an additional 15 meters is required along the south east boundary of the club’s landholding to accommodate the expansion of both playing pitches to meet GAA standards and accommodate safe walkways around the perimeter. This will help to provide playing facilities and active recreation for the existing and projected population in the community. The land adjoining the club grounds are designated as Strategic Reserve.

Due to the illustrative nature of mapping (not to scale) in the masterplan it is not possible to ascertain if there is sufficient space to facilitate the required expansion for playing pitches and the walkway. It is requested that an amendment be made to the Amenity, Open Space and Recreation lands outlined at the club if a design team finds that there is an insufficient quantum of zoned amenity land to accommodate the expansion.

**Proposed Amendment** - *The Planning Authority is respectfully requested to support the minor expansion of ‘Amenity, Open Space, Recreational’ Zoning to facilitate upgrade of Pitches Nos. 1 & 2; and associated green spine walkways, given the strategic location of the subject site and the required appropriate support of the maintenance of extant active recreation facilities.*



See area outlined in red on map extract below which is required for standardisation of playing fields.



*Area required for standardisation of playing pitches / walkway*

The following amendment is proposed with or in place of proposed amendment above.

**Proposed Amendment** - That a Specific Objective be attached to the site which supports the required upgrade to extant playing fields and safeguards the development of required green connectivity infrastructure, to ensure the full development of the north-south green spine of the consolidated lands during the lifetime of the Masterplan, as follows:

*'To support the improvement of existing pitch infrastructure within the Dicksboro GAA & Camogie Club to meet current and future growth needs, in tandem with walking/cycling green infrastructure links as required to achieve connectivity between the Club lands and proposed residential lands at Kilcreene.'*

**3) Ensuring connections do not run through playing pitches**

Figure 5.2 of the Material Amended Masterplan illustrates walking/cycling connections running through both of the clubs playing pitches. It is suggested that such connections are achieved via club green walkways around and between the established playing fields.

**4) Route selection for R7**

Regarding a key objective to progress route selection, planning and development of road connection from R695 to the R693 (Objective R7) it is understood that a western access route is a key option. However, should a more easterly alignment be proposed for route options the Club will engage with the Planning Authority to establish protection of club operations and access.

**Interim Chief Executive’s Response:**

While the submission does not relate to Material Amendments, please see below response to the issues raised:

- 1) The Masterplan does not restrict development of Phase 2, “Open Space” lands. Phase 2 applies to “Residential” zoned lands only and such “Open Space” zoned lands can be developed (subject to permission being granted) prior to delivery of Phase 2 Residential as they are not tied to the requirement of the additional road infrastructure being in place.
- 2) Adjoining lands to the south east are zoned “Strategic Reserve” in the City and County Development Plan. The Masterplan does not constitute a zoning exercise and cannot expand zoning, but indicates what should be considered for future Development Plan zoning reviews. Public Open Space, private open space, and extensions to existing developments are ‘Open for Consideration’ on Strategic Reserve lands in the Kilkenny City and County Development Plan 2021-2027. Walking / Cycling Connections illustrated in Figure 5.2 are indicative and will be facilitated. Figure 6.3 provides additional detail showing Key Pedestrian / Cyclist Routes skirting around the perimeter of the playing fields. The plan can recommend that these matters be considered in future zoning reviews.
- 3) Stakeholders along with the public will have the opportunity to make submissions during the route selection process. Additional text is recommended to address the routes skirting GAA lands.

**Interim Chief Executive’s Recommendation:**

- 2) Include text in Section 6.2 stating “Key Pedestrian/ Cycle routes are indicative. Future zoning reviews for ‘Strategic Reserve’ lands adjacent to Dicksboro will have regard to the need to provide public cycle paths and the potential for the expansion of existing Dicksboro pitches GAA standards.”

Ref	Name
KK-C213-2	Caitriona Smith

**Summary:**

The submission raises a series of comments and general questions in relation to the Masterplan. These are outlined below:

General

- How have public consultation meetings been reflected in the plan?
- Difficult to read and process the plan documents to formulate a submission.
- Would be helpful if there was an opportunity to co-create bullet point submissions with the help of experts at meetings or at a later date to get more submissions and better-quality feedback from the public.

### Open Space / Biodiversity

- Where is the area for designated community gardens / allotments?
- No looped walk marked around Loughmacask for people to access its natural beauty and wildlife
- Is the River Breaghagh Park Area public land and if not, how will the council acquire it? Can it be acquired via CPO? Are CPO's limited to road projects?
- Where are the wildlife corridors for animals to move between Breaghagh Valley, Loughmacask and the River Nore? Corridors need trees, shrubs and wildflower meadows. Green spine may need to be widened to accommodate them. Building in this area will take a lot of habitat from wildlife.

### Active Travel / Roads

- There is no planned bus route
- New cycle / footpaths are welcomed and the 10-minute zone for access to local services (shops, school, health)
- This route should be included in the "Enhanced Pedestrian and Cyclist Facilities on the Radial Routes within Kilkenny City".
- Pedestrian crossing marked at the pedestrian gate into Ayrfield housing estate is welcome.
- How can new bike / pedestrian paths be accessed from beyond Grasslands factory?
- How can the Tullaroan Road be crossed safely by pedestrians and cyclists to continue journeys towards Tullaroan? It is not family or child friendly.
- Safe pedestrian / bike crossing over the Tullaroan Road to Dicksboro GAA is needed urgently. The crossing marked for a potential new entrance further towards town will not work.
- A safe footpath up to the playing fields is also required urgently. It is not pedestrian / cyclist friendly due to shared use with lorries from factory.
- Where are set down / parking areas planned for people living outside of the area to be able to avail of the 10-minute walking / cycling facilities to schools etc?
- Why are there no clear routes / proposals for additional roads? R1, R5, R6, and R7 are marked poorly with no route indicated.
- What is the delay in building these roads? Butts roundabout is almost at capacity before the new houses are built.
- Will the current developments be postponed if these are not built?

### **Interim Chief Executive's Response:**

The submission does not refer to any Material Amendments. Please see below response to the issues raised:

### General

Information regarding public consultation meetings and the issues raised are outlined in section 1.4 of the Interim Chief Executive's Report on the Draft Loughmacask Masterplan, dated March 2023. Feedback from these events along with the submissions received during the consultation period helped to inform the plan and led to the Material Amendments proposed. The Planning Authority is satisfied that the issues raised at these meetings have all been extensively addressed in the Interim Chief Executive's report, even though they may have been addressed in response to individual submissions.

The comments and proposals in relation to assisting the public with submissions in the future are acknowledged and appreciated. However, it should be noted that during the consultation process staff from Planning, Roads and Housing Sections were available to assist the public at the drop-in information evening on the 8<sup>th</sup> of May 2023, in St. Canice's Neighbourhood Hall. This drop-in facility facilitated discussion and explanation around the issues raised not only at the public meetings but also by virtue of individual submissions. The Council will consider how to best facilitate submissions during these events.

#### Open Space / Biodiversity

A specific area has not been designated for community gardens / allotments. There is a sufficient quantum of land designated for amenity, open space and recreation to provide flexibility for a suitable location in future.

Figure 6.3 of the Masterplan illustrates potential key pedestrian / cycle routes around Loughmacask as permitted under permission 10/15. These walkways crossed the lake and following recent investigations it was considered they could be impacted upon by the high-water mark, potentially rendering parts unusable during flood events. Following consultation with National Parks and Wildlife and agreed in terms of an Bord Pleanála's conditions, these routes were subsequently stepped back to looped walks so as to mitigate the potential for impact on the lake and its environs.

The lands designated for the River Breaghagh Park are in private ownership and are in large part of the Natura 2000 network. It is considered the most appropriate land use at this location is for amenity / open space purposes. A CPO usually takes place to allow a public infrastructure project to go ahead for the common good. While this procedure is often used for road improvement schemes it is not restricted to road schemes. The Council may in future decide to purchase the land or alternatively it may be developed privately.

A Masterplan is not intended to go into detail regarding wildlife corridors however, Figure 6.5 illustrates connectivity on amenity space between the Breaghagh Valley, Loughmacask and the River Nore. By their nature these open space/amenity corridors will be flexible and may in future provide for such corridors within the urban context.

#### Active Travel / Roads

Future city bus routes will be considered in the Kilkenny Sustainable Mobility Plan.

It is not feasible to include proposed new cycle / footpaths outlined in the Masterplan within the "*Enhanced Pedestrian and Cyclist Facilities on the Radial Routes within Kilkenny City*" as this refers to radial routes, these are essentially public transport routes. Many of the proposed new cycle / footpaths are not on existing public transport routes.

Regarding the provision of footpaths serving the GAA club, it should be noted that key pedestrian / cyclist routes will link with GAA facilities at Dicksboro (see figure 6.3) through amenity lands, therefore reducing the need to share existing access / exit with vehicular traffic.

In relation to the provision of a pedestrian crossing on the Tullaroan Road, it should be noted a Masterplan is not an instrument to identify specific locations for such infrastructure, however objective 6e ensures additional traffic management measures will be considered to mitigate the impact of traffic from already approved developments.

As outlined in the CE Report on the Draft Plan, dated March 2023 the Council is currently engaged in the Sustainable Urban Mobility Plan (SUMP) which will address the wider City mobility issues. The SUMP will include many active travel measures which the Council seek to promote to achieve the 10 Minute City concept that will help to reduce carbon emissions, car dependence and help to meet climate change objectives / targets.

The route selection processes for roads related to objectives R6 and R7 have not been finalised and therefore cannot be illustrated in the Masterplan. It needs to be acknowledged that development of significant road infrastructure such as the routes identified take time, with many obstacles to be overcome before works can proceed.

Finally, current permitted developments can proceed without additional road infrastructure.

**Interim Chief Executive’s Recommendation:**

No change to Material Amendments.

Ref	Name
KK-C213-3	Michael Cullinane
<p><b>Summary:</b>            The submission primary concerns traffic and roads infrastructure. The following was welcomed:</p> <ul style="list-style-type: none"> <li>• Inclusion of objectives 6c and 6d</li> <li>• Publication of the document entitled “<i>Review of Traffic</i>” dated February 2023</li> </ul> <p>Reference is made to comments in the review of traffic document about the Granges Road. It is stated that it is “<i>a residential street but is operating as a relief road and a designated route for HGVs</i>” and that “<i>vehicular traffic conditions are incompatible with residential and educational uses</i>”. The Granges Road is compacted by congestion and given its function as a residential and school street traffic volume should be reduced significantly. Top priority needs to be given to relieving the existing situation and preventing further deterioration in the next few years.</p> <p>It is submitted that the following issues have been overlooked.</p> <ul style="list-style-type: none"> <li>• No allowance has been made for the substantial additional traffic that will be using the Freshford Road to access the new CBS school. The location of the school at the northern end of the City without adequate road infrastructure will cause serious traffic congestion and frustration for all parties affected.</li> <li>• Major concern regarding accessibility to the two hospitals (St. Luke’s and Aut Even) also at the northern end of the City particularly for emergency cases at peak drop-off and collection school times each day.</li> </ul> <p>In conclusion, the amendments are welcomed but it is suggested to give priority to the traffic problems on the Granges Road and prevent similar issues on the Freshford Road.</p>	

**Interim Chief Executive's Response:**

It considered that Material Amendments which include objectives 6b, 6c, 6d and 6e will lead to the provision of additional road infrastructure / traffic management measures and ease congestion on access routes to schools and hospitals in the area. The CBS school was granted permission subject to a comprehensive "Traffic Impact Assessment", which considered those matters relating to additional traffic at peak hours on proximate road infrastructure, including the Freshford Road. The Masterplan per se will not give rise to further impacts but does include potential for mitigation of permitted developments by virtue of Roads R6 and R7, with additional measures potentially being included in Kilkenny City's Sustainable Mobility Management Plan.

**Interim Chief Executive's Recommendation:**

No change to the Material Amendments.

#### **4. Next Steps**

The Members shall consider the Interim Chief Executive's Report and following this consideration the Masterplan shall be deemed to be made or amended by resolution, with all, some or none of the material amendments as published.

## **5. Summary of Recommendations of the Interim Chief Executive**

In total 3 submissions were received on the Proposed Material Amendments to the Draft Loughmacask Masterplan.

This report has addressed all submissions received in relation to the proposed material amendments.

I recommend that the Loughmacask Masterplan be adopted with Material Amendments as proposed.



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**Sean McKeown,**  
**Interim Chief Executive**