



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: 14th March, 2023.

Dear Councillor,

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

I recommend that the Members accept the recommendations as set out in the Report dated 10th March, 2023.

Yours Sincerely,

Sean McKeown
Interim Chief Executive.

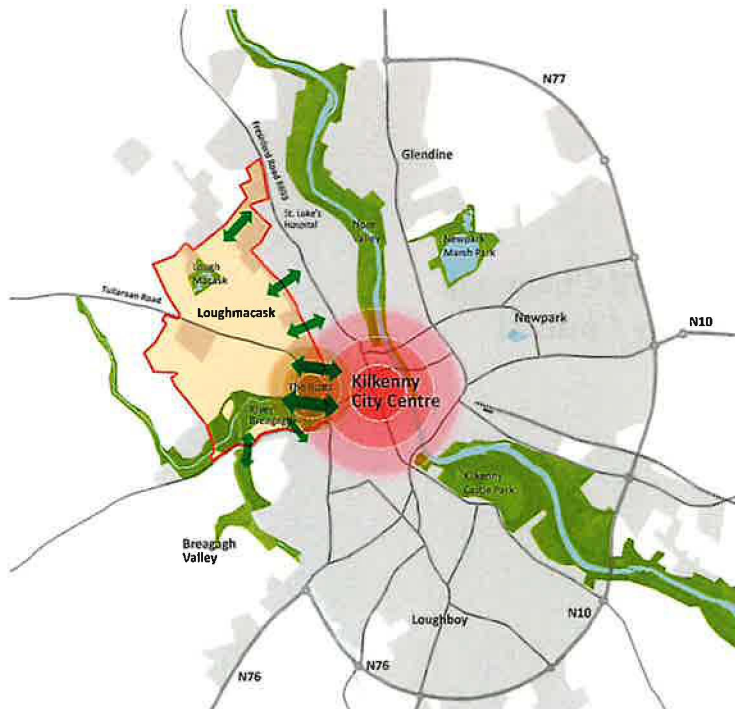
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**Comhairle Chontae Chill Chainnigh
Kilkenny County Council**



Interim Chief Executive's Report

Submissions received regarding the Draft Loughmacask Masterplan



10th March 2023



**Comhairle Chontae Chill Chainnigh
Kilkenny County Council**

Sean McKeown,
Interim Chief Executive

Denis Malone,
A./Director of Services

Nicolaas Louw,
A./ Senior Planner

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1 Introduction

This report addresses the submissions received during the 6-week public consultation period from **Friday 26th August 2022 – Friday 7th October 2022** in relation to the Draft Loughmacask Masterplan.

The purpose of the report is to:

- (a) Report on the written submissions/observations received in relation to the Draft Loughmacask Masterplan during the public consultation period.
- (b) Set out the Interim Chief Executive's response to the issues raised in the submissions/observations and;
- (c) 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 for their consideration.

1.1 Draft Masterplan

The draft Loughmacask Masterplan sets out the vision and guiding principles of the development of the Loughmacask area within Kilkenny City. The Vision is that Loughmacask will be an exemplar and planned new residential quarter of Kilkenny City, characterised by sustainable mobility connecting people to high quality housing, local facilities and amenities and the City centre and set within a distinctive landscape and historic City context.

The Loughmacask Masterplan will be a guiding document envisioning the following:

- A distinctive and vibrant neighbourhood, building on the existing locality and communities and providing an excellent quality of life with urban and rural amenities.
- A walkable urban quarter with day-to-day facilities and amenities within a 10-minute walk or cycle of homes - reducing private transport dependency and strengthening local communities.
- A new urban quarter that expands on and is integrated with the historic City Centre as well as the natural landscape of the Breagh river.
- Excellent provision of open space, green networks and local facilities that cater for local need, foster community growth and support health and well-being.
- A response to climate change, through sustainable transport, energy efficient building technologies, and a strong green infrastructure network including sustainable drainage (SuDS) utilising soakaways, swales, infiltration trenches, ponds and wetlands where feasible to assist with flood management.

1.2 Planning Context

Planning Authorities have a statutory responsibility to plan for the sustainable development of their areas, primarily through the development plan process but also through local area plans.

Non-statutory framework plans and site development briefs can supplement but not replace the function of statutory plans. The Loughmacask Masterplan is intended to be a non-statutory design framework and will offer non-statutory guidance to supplement the provisions as set out in the Kilkenny City & County Development Plan 2021-2027.

In the case of all such non-statutory documents, the policy context must be set by statutory plans. In finalising this Masterplan the Council will identify the elements of the plan which it intends to use for secure imperative objectives and development management standards for the area and these will be incorporated into the Development Plan by way of variation(s) on completion of the Masterplan.

1.3 Documents on Public Display

The documents put on public display for the Draft Loughmacask Masterplan were:

- Draft Loughmacask Masterplan
- Public Notice
- Appropriate Assessment Screening and Natura Impact Report

- Strategic Environmental Assessment – Environmental Report - Non-Technical Summary
- Strategic Environmental Assessment Report
- Site Specific Flood Risk Assessment

All of the above documents were placed on the 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
- Fr. McGrath Centre, St Joseph's Rd, Kilkenny

Submissions could be made from the **Friday 26th August, 2022 – Friday 7th October, 2022** (*both dates inclusive*) by:

Email to e-mail to 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.

1.4 Public Consultation

Pre-draft consultation:

Public consultation in the form of a presentation and questions and answers session were held on the Draft Loughmacask Masterplan as follows:

Dicksboro GAA Clubhouse, GAA Club at Palmerstown Road, Kilkenny R95 D362 on 20th January, 2020 from 7:30pm to 9:30pm;

Consultation on Draft Masterplan

Due to the impact of Covid 19, the process to draft the Masterplan was stalled during 2020 and 2021 and recommenced in 2022 when a Draft Masterplan was placed on public display. Public consultation with regards the Draft Loughmacask Masterplan took place as follows:

Dicksboro GAA Clubhouse, GAA Club at Palmerstown Road, Kilkenny R95 D362 on Tuesday 6th September, 2022 from 7:00pm to 9:00pm;

St. Canices Neighbourhood Hall, 22-28 Butt's Green, Gardens, Kilkenny, R95 X72P on Monday 19th September, 2022 from 7:00pm to 9:00pm;

St. Canices Neighbourhood Hall, 22-28 Butt's Green, Gardens, Kilkenny, R95 X72P on Monday 17th October, 2022 from 6:00pm to 9:00pm;

Public consultation in the form of a drop-in evening, to provide an opportunity for the public to view the Draft Plan and speak with a member of the Planning / Roads and Housing team to clarify and issues in advance of making submissions was held as follows:

St. Canices Neighbourhood Hall, 22-28 Butt's Green, Gardens, Kilkenny, R95 X72P on Monday 10th October, 2022 from 5:00pm to 7:00pm.

2.0 Submissions received during Public Consultation

A list of the submissions received are included below:

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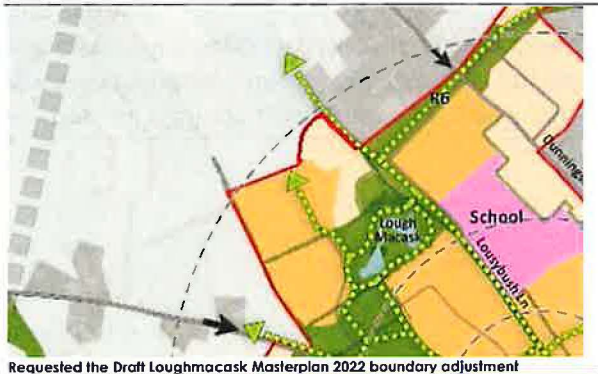

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3.0 Summary of Issues Raised, Interim Chief Executive's Response and Recommendations

Sub. No.	From	Summary of Issues	Interim Chief Executive's Response & Recommendation
1	Cathal McEvoy	<p>Is léir go bhfuil meon iar-choilíneach ag daoine go fóil. Ní gá go mbeadh ainm galldaithe ag áit nua-bunaithe in Éirinn sa lá atá inniú ann. Ba chóir go bhfuil ainm gaelach tugtha ar an áit seo. Ainm a dhéanann ciall agus a dhéanann cur síos ar an áit nua seo. Béadh sé mar smaoineamh maith labhairt le daoine sa phobal faoin ainm agus ansin ainm a réiteach ina bhfuil nasc ceart leis an bpobal.</p> <p>The submission which was received in Irish translates as follows:</p> <p>It is clear that people still have a post-colonial mindset. A newly established place in Ireland today does not need to have an anglicised name. This place should be called an Irish name. A name that makes sense and describes this new place. It would be a good idea to talk to people in the community about the name and then to prepare a name that has a proper connection with the community.</p>	<p>Interim Chief Executives Response:</p> <p>Tagann ainm an mháistirphlean ó cheantar beag bogaigh, Loch Macask (Loch Mocháisc), atá ainmnithe mar Limistéar Oidhreachtá Dúlra (pNHA) beartaithe. Is é an ceantar a aithnítear mar Loch Mocháisc an chuid is mó de limistéar an Mháistirphlean – (féach logainm.ie)</p> <p>Ba é Loch Mocháisc an t-ainm a tugadh ar an bplean ceantair áitiúil roimhe seo in 2008. Chun leanúnachas a áirithiú agus mearbhall nach bhfuil gá leis a sheachaint do bhaill an phobail, ba cheart ainm an phlean a bheith mar an gcéanna i gcónaí.</p> <p>Ba chóir go léireodh ainmniú eastát cónaithe laistigh den cheantar comhthéacs áitiúil agus stairiúil. Spreagtar úsáid ainmneacha Gaeilge. Is é seo polasaí reatha na Comhairle sa Phlean Forbatha Cathrach agus Contae (feach alt 13.12 de Phlean an Chontae, Imleabhar 1)</p> <p>The Masterplan name is derived from a small wetland area, Lough Macask (Loch Mocháisc), which is designated as a proposed Nature Heritage Area (pNHA). The area identified as Loughmacask forms the larger part of the Masterplan area – (see logainm.ie)</p> <p>Loughmacask was also the name given to the previous local area plan in 2008. To ensure consistency and avoid unnecessary confusion for members of the public, the name of the Masterplan should remain the same.</p> <p>The naming of residential estates within the area should reflect local and historical context. The use of Irish names will be encouraged. This is current policy of the Council in the City & County Development Plan (see section 13.12 of County Plan Vol 1)</p>

			<p>Interim Chief Executives Recommendation:</p> <p>Níl aon athrú molta.</p> <p>No change to Draft Masterplan.</p>
2	Peter Thomson Planning Solutions on behalf of Pat & Mark Cantwell	<p>The submission seeks the adjustment of the Draft Loughmacask Masterplan 2022 boundary as per the map extract below.</p>  <p>This adjustment was recommended by the Interim Chief Executive as a Material Alteration to the Draft Kilkenny County Development Plan 2021-2027 and agreed by the Members in response to a previous submission yet this was not fully reflected in the adopted Plan.</p> <p>A series of maps and an extract from the CE report on submissions to the Proposed Material Alterations of the Draft Kilkenny City and County Development Plan 2021-2027 are included in support of this submission.</p>	<p>Interim Chief Executives Response:</p> <p>The Masterplan area was incorrectly indicated in the draft KCCDP 2021-2027. See relevant extract of draft zoning map illustrated below:</p>  <p>Boundary in Draft City and County Development Plan 2021-2027</p> <p>The Masterplan boundary was subsequently reduced while a portion of lands were also zoned for existing residential purposes. See extract of the amended settlement boundary / zoning map from the adopted KCCDP 2021-2027 illustrated below. The draft Masterplan boundary did not align with adopted Development Plan 2021. The Masterplan will be adjusted to reflect exactly the zoning line in the adopted Kilkenny City and County Development Plan 2021-2027</p>

			 <p>Zoning and Masterplan boundary as adopted in the City and County Development plan 2021-2027.</p>  <p>Boundary as shown in the draft Masterplan.</p> <p>Interim Chief Executives Recommendation:</p> <p>It is proposed to amend the Masterplan boundary to reflect the zoning boundary as indicated in Figure CS4 of the Kilkenny City and County Development Plan 2021-2027.</p>
3	Environmental Protection Agency (EPA).	<p>A copy of '<i>SEA of Local Authority Land Use Plans – EPA Recommendations and Resources</i>' is included with the submission. It is suggested that this guidance document is taken into account.</p> <p><u>Content of the Environmental Report</u></p>	<p>Interim Chief Executive's Response:</p> <p>The SEA Environmental Report includes references to various EPA guidance, recommendations, and resources.</p> <p>Section 10 of the Environmental Report sets out the approach to monitoring of the implementation of the plan.</p>

		<p>Table 8.3 in the Environmental Assessment of the Masterplan includes a column outlining how 'uncertain' effects', as currently assessed, may impact on some SEO's as a result of implementing the Masterplan. If the monitoring identifies adverse impacts during the implementation of the Masterplan, the Council should ensure that suitable and effective remedial action is taken.</p> <p>State of the Environment Report In finalising the Masterplan and integrating the SEA findings, the recommendations, key issues and challenges described in the EPA's state of the Environment Report '<i>Ireland's Environment – An Integrated Assessment 2020</i>' should be considered.</p> <p>A copy of the final SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.</p>	<p>In finalising the plan and integrating the SEA findings the Council will have regard to relevant guidance documents provided by the EPA.</p> <p>Interim Chief Executive's Recommendation: No change to Draft Plan</p>
4	Geological Survey Ireland (GSI).	<p>GSI are pleased to see the use of GSI Groundwater and Groundwater Flood Maps Datasets Bedrock, Karst and Groundwater Vulnerability Maps within the draft Masterplan and SEA report.</p> <p>Use of GSI data or maps should be attributed correctly to 'Geological Survey Ireland'.</p>	<p>Interim Chief Executives Response: Comments are noted.</p> <p>Interim Chief Executives Recommendation: Reference GSI data in relevant sections of the Plan where used, including SEA.</p>
5	Office of the Planning Regulator (OPR)	The submission states that they have no comment in relation to the Masterplan at this time.	<p>Interim Chief Executives Response: Comments noted.</p> <p>Interim Chief Executives Recommendation: No change to Draft Plan.</p>
6	Martin Hanrahan	<p>The plan is welcomed and the council are commended for its innovative and modern citizen friendly initiatives for the area.</p> <p>It is submitted that the plan does not sufficiently address existing traffic volumes in the area which is likely to increase dramatically due to additional housing / schools proposed in the plan.</p>	<p>Interim Chief Executives Response: Permission for the CBS school including a link road to the Freshford Road, and a quantum of housing (c.650 units) have already been permitted in the area. The Masterplan cannot retrospectively over-ride permitted developments. As part of the assessment of this submission a review of the traffic impacts of planning permissions granted was carried</p>

		<p>It is requested that funding be pursued to prepare a road plan to address and minimise the traffic issues that will arise. The adoption of the plan is opposed until such time as a coherent, workable road and traffic plan is incorporated into the Masterplan.</p>	<p>out to form an opinion on likely future traffic impacts. The review acknowledged that there are congestion issues within the Plan area and that additional infrastructure is required to deal with future developments within the Plan area.</p> <p>It is proposed to include an objective in the Masterplan that ensures that no additional housing (excluding the already permitted quantum of housing) with access off the Tullaroan Road would receive permission to commence prior to a timeframe for the necessary support road infrastructure being in place.</p> <p>It should be noted there the Plan is based on the 10 Minute concept and that 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.</p> <p>The Plan promotes and facilitates sustainable travel modes in the area. It is an objective of the Plan to remove heavy goods vehicles and other non-essential traffic from Lord Edward Street and to direct them towards the Kilkenny ring road via connecting infrastructure. This is provided for through objective R7 in the City and County Plan 2021-2027, which is a priority for the Council to implement.</p> <p>It is also proposed to include an objective for options to connect R6 with the Tullaroan Road, subject to the appropriate traffic management regime.</p> <p>The existing and permitted developments require services of a neighbourhood centre which otherwise would require travel outside the Plan area to access. It is considered that the neighbourhood centre could be considered for development subject to Traffic Impact Assessment for services that will provide local facilities for new and existing (Butts) neighbourhoods.</p>
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			<p>The Council will continue to pursue funding for road projects identified in the City and County Development plan 2021-2027 including (R1) the Northern Ring Road extension from the Freshford Road to the Castlecomer Road and R7 the connection from Kilmanagh to the Freshford Road.</p> <p>Interim Chief Executives Recommendation:</p> <p>Within section 6.2 include an objective to prioritise the route selection and construction of connecting inner orbital route (R7 in the City and County Development Plan 2021-2027) from the Kilmanagh Road to the Freshford Road on Figure 6.6.</p> <p>To also include an objective “to investigate, how the R6 can be connected with the Tullaroan Road subject to appropriate traffic management regime.”</p> <p>Include an objective in section 6.7 Phasing to read “Subject to the appropriate Zoning being in place and a Traffic Impact Assessment, additional housing developments (over and above the permitted quantum of housing) with access off the Tullaroan Road will not be permitted unless a clear timeframe for delivery of the necessary extent of support road infrastructure Objective R7 (being either Kilmanagh Road to Tullaroan road) or (the Tullaroan Road to Freshford road) in the City and County Development Plan is in place.”</p>
7,11,36,42	Parkview Drive Residents Committee, James Wyse, Mike Hennessy, Kevin Madden	<p>The submission refers to the recent public consultation event at Dicksboro GAA Club and suggests sufficient time was not given to discuss / resolve the issues raised which included the lack of thought and provision for those currently living in the area and the lack of provision for an adequate road structure in Loughmacask.</p> <p>The issues primarily concern traffic congestion and road infrastructure. The list of concerns is outlined below:</p>	<p>Interim Chief Executives Response:</p> <p>The Dicksboro event was only one event in a much wider public consultation exercise. The Council also held further public consultation events at St. Canice’s Neighbourhood Hall on the 19/09/22, 10/10/22 (Drop in, information session), and on the 17/10/22 to ensure sufficient time was given for discussion. A summary of the issues raised in the consultation event held at Dicksboro GAA Club are outlined as an appendix to this report.</p>

		<ul style="list-style-type: none"> - Increased levels of traffic in the area are causing concern to many young families in regards to their children's safety. - This highlights the necessity for completion of the Inner Relief Road which needs to be the top priority for the council. - The relocation of the CBS school to the Dunningstown Road highlights the urgent need for a relief road. - The volume of traffic on the Granges and Freshford Roads going from and to the City Centre during school drop-off / pick-up times makes it almost impassable. - Congestion is exacerbated by heavy trucks from PRL, Glanbia, Grassland and others which also increase danger to children attending existing schools. - Housing developments at Ayrfield, Fox Meadow, Loughmacask and the Pembroke site will provide circa 700 houses leading to an extra 1,050 cars using the Tullaroan & Granges Road's. This is causing extreme distress to residents many who are elderly and infirm. - The City will not be in a position to achieves its potential until completion of the Inner Relief Road across to the Freshford Road and the Ring Road/Western bypass. - The Masterplan has no regard for the wellbeing, mental health, or safety of residents and does not serve the people. <p>It is requested that the minutes of the meeting at Dicksboro GAA are made available to the public and submitted as part of any submission to ensure transparency and for the public record to show the level of discontent with the lack of foresight towards roads and congestion in the area.</p> <p>The adoption of the plan is opposed until such time as a coherent, workable road and traffic plan is incorporated into the Masterplan.</p>	<p>Current traffic congestion issues and the need for additional mobility infrastructure in the area are recognised. The Council proposes to address the phasing of future development so as to align same with relief infrastructure provision (i.e., objective for R7 etc. and R6 extension). See also response to submission no. 6 above.</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission no. 6 above.</p>
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8	Rory Sherwin	<p>Serious concern is raised in relation to the plans proposed some of which are already underway, along with the lack of provision for an adequate road structure, which will curtail access for ambulances, to/from Saint Luke's Hospital.</p> <p>The lack of plans for improved road infrastructure to handle the expected increase in traffic is worrying given the development proposed in the hospital environs which includes circa 700 new houses, additions to existing schools along with a new school on the Dunningstown Road. In the absence of a road infrastructure plan as part of the Masterplan, the plan is being opposed / objected to.</p>	<p>Interim Chief Executives Response:</p> <p>Current traffic congestion issues and the urgent need for additional mobility infrastructure in the area are recognised. The Council proposes to address the phasing of future development so as to align same with relief infrastructure provision. See also response to submission no. 6 above. Congestion at peak hours are potentially problematic for all services, including emergency services. The potential for a connection of R6 to the Tullaroan Road and the completion of R7 between the Kilmanagh Road and the Freshford Road will provide an inner orbital route which will facilitate improved access to emergency vehicles.</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission no. 6 above.</p>
9	Irish Water	<p>The opportunity to review the Masterplan is welcomed and it is requested that engagement continues through the feasibility, design and construction stages to ensure public water services and sources are protected and access is maintained.</p> <p>It is stated that there is sufficient capacity available in the water and wastewater treatment infrastructure to serve / cater for the ambitions of the Planning Authority in the City / Loughmacask area for the Development Plan period.</p> <p>Irish Water is working in partnership with the development community to support the installation of strategic infrastructure to service current and future social and economic targets of the wider Loughmacask area.</p> <p>The Masterplan does not refer to the full build out housing quantum ambitions, in relation to future engagement the Planning Authority is requested to provide full clarity on development ambitions proposed within the Masterplan area.</p>	<p>Interim Chief Executives Response:</p> <p>There are circa 650 units already permitted in the Masterplan area. However, the overall development ambitions for the area set out in section 6.5 of the Draft Plan where densities are addressed. Overall, it is anticipated the Masterplan area could accommodate circa 1,600 residential units when it is fully built out. However, not all lands earmarked for Residential development in the Masterplan are currently appropriately zoned for Residential development in the City and County Development Plan 2021-2027. Future zoning amendments to the City and County Development Plan will be carried out in consultation with Irish Water.</p> <p>Interim Chief Executives Recommendation:</p> <p>No change to Draft Plan</p>

10	Katherine Byrne	<p>The submission refers to the recent consultation event at the Canice's Neighbourhood Hall where serious concerns were expressed at the lack of consideration for those living in the area along with the inadequate road infrastructure outlined in the draft Masterplan.</p> <p>The issues primarily concern traffic congestion and road infrastructure. The concerns are outlined below:</p> <ul style="list-style-type: none"> - The high volume of traffic on the Granges and Freshford Roads going from and to the City Centre during school drop-off / pick-up times makes it almost impassable. - Congestion exacerbated by the growing number of heavy trucks from PRL, Glanbia, Grassland and builders is a major concern along with increased danger to children attending St. Canice's NS. - Existing schools awaiting further development along with new housing developments at Ayrfield, Clancy/Glenveagh developments, Loughmacask and the Pembroke sites which will provide circa 700 houses and lead to an extra 1,050 cars using the Tullaroan & Granges Road's. - St. Luke's and Aut Even hospitals also generate further traffic via ambulances, visitors and staff. - Current situation is untenable and a source of extreme distress to residents many who are elderly or infirm and cannot cycle, walk or use public transport. - It is unsafe for children to cycle given the high volume of traffic in the area. Concerns are in conflict with the plan's 10 Minute City vision. - Concerns highlight the need for immediate completion of the Inner Relief Road across to the Freshford Road and the Ring Road / Western bypass. These projects need to be the Council's top priority. - The relocation of the CBS school to the Dunningstown Road highlights the urgent need for a relief road, where works have begun without the necessary road infrastructure. 	<p>Interim Chief Executives Response:</p> <p>Current traffic congestion issues and the urgent need for additional mobility infrastructure in the area are accepted. The Council proposes to address the phasing of future development so as to align same with relief infrastructure provision.</p> <p>A detailed report on the traffic impact assessments carried out for the permitted developments was undertaken as part of this CE's report. The current situation is identified in that and the proposed amendments are designed to deal with those issues.</p> <p>The land use planning of the area is based around the concept of the 10 minute city. Essential services such primary/ secondary schools, Primary care unit and proposed neighbourhood centre are all located within a 10-minute walk or cycle of the housing in the Plan area.</p> <p>See response to submission no. 6, and to no. 7,11,36,42 above.</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission no. 6, and to no. 7,11,36,42 above.</p>
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12	Armstrong Planning on behalf of Shay Properties Ltd	<p>Shay Properties are the new owner of Kilcreene Lodge which is a fully restored protected structure set within the River Breagagh Valley. The property constitutes important historic fabric that is integral to the cultural history of Kilkenny. As the new owners acquired the site in 2021, they were not in a position to participate in earlier consultations (i.e. January 2020) and this is their first opportunity to do so.</p> <p>The previous owners were successful in securing planning permission (planning ref: 21/280 & 21/400) for 9 large family homes on the grounds and the houses were never built out. It should be noted that the new owner is not inclined to develop this historic site. It is their intention to conserve and protect this important component of Kilkenny's built heritage instead. These ambitions very much serve the National Strategic Outcomes of the National Policy Framework (NPF) as they aim to ensure 'enhanced amenity and heritage'.</p> <p>The Council is asked to have regard to a range of issues outlined under the following four headings which include Heritage Value, Transport Infrastructure, Aspirational Pedestrian / Cycle Routes and Ecology.</p> <p><u>Heritage Value</u> It is submitted that the Draft Masterplan:</p>	<p>Interim Chief Executives Response:</p> <p>The Council acknowledges the wishes of the landowners to keep lands free of development, notwithstanding the extant permissions.</p> <p>In relation to the other matters raised these are addressed under the headings below:</p> <p><u>Heritage Value</u> It must be recognized that Kilcreene Lodge is a protected structure (B117) as part of the City & County Development Plan. It is supported and guided by the built heritage policies associated with the RPS. It is considered that the Masterplan respects the heritage value of the lodge and its setting, which is reflected in its land use designation as an area to be used for amenity.</p> <p>Connections were indicated through the lands to showcase the lodge and its setting whilst also providing a recreational area for the community.</p> <p>In relation to section 5.1.1. the intention of the wording is to enhance existing heritage and green characteristics in the area. It will be proposed to amend this wording to provide clarity.</p>

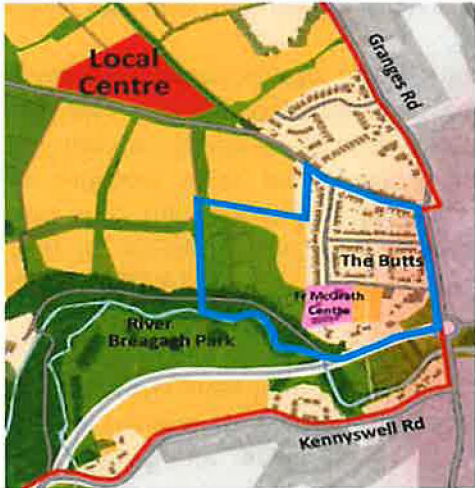
		<ul style="list-style-type: none"> - Makes no reference to the heritage value of Kilcreene Lodge, and fails to identify it as a positive, a strength, or an opportunity. - Fails to acknowledge the contribution that the period house and grounds make to the character and setting of the area or how the grounds and setting contribute to the heritage value of the protected structure itself. - Lacks heritage input. - Sets out no policy objectives for the protection or conservation of such heritage assets. <p>Section 5.1.1 states that “<i>Loughmacask will build on the existing heritage and green characteristics of the Masterplan area</i>”. This wording is ambiguous, leading one to hope that the intention is to build metaphorically rather than literally on such heritage sites.</p> <p>It is asked that the Masterplan formally identifies the positive value of Kilkenny’s heritage assets, such as Kilcreene Lodge, and provide the policy basis for protecting the integrity and significance of such assets, and the contribution that they make to cultural heritage and the setting of the Masterplan area and the wider city.</p> <p><u>Transport Infrastructure</u></p> <p>A range of objectives from the Kilkenny City and County Development Plan 2021-2027 which are pertinent to the Masterplan area are noted. These relate to road infrastructure and particularly phases 2 and 3 of the Central Access Scheme and include objective 12AG in Volume 1 and Objectives R1, R5, R6, and R7 in Volume 2.</p> <p>The Draft Masterplan provides that the phased implementation of additional road infrastructure will facilitate phased changes in traffic movements, including re-routing traffic from the Tullaroan and Granges Roads to the bypass creating a safe street environment in Loughmacask.</p>	<p>Policies, objectives, and development management requirements in relation to heritage/built-heritage assets are outlined in Volume 1, Section 9.3 of KCCDP 2021-2027. It is not necessary to duplicate all these in the Masterplan but they will be referenced.</p> <p><u>Transport Infrastructure</u></p> <p>Current traffic congestion issues and the urgent need for additional mobility infrastructure in the area are noted. The Council proposes to address the phasing of future development so as to align same with relief infrastructure provision. See also response to submission no. 6 above. The delivery of the outer ring road extension remains an objective (R1) of the Kilkenny City and County Development Plan. It is now also a new objective (R7) of the City and County Development Plan 2021-2027 to create an inner orbital connection between the Freshford Road and the Kilmanagh Road.</p> <p>It should be noted that Phase 3 of the Central Access Scheme as proposed under ABP re PL10.HA0014 has been significantly altered. There is an objective to construct R7 and to include an investigate, how objective R6 can be connected with the Tullaroan Road subject to appropriate traffic management regime. See also response to submission no. 6 above in this regard.</p> <p><u>Pedestrian / Cycling routes</u></p> <p>It remains an objective of the plan to connect the open space to the West of The Butts to the Breaghagh Park via a pedestrian link. A route selection for such a connection has to be carried out prior to any development proposals.</p> <p><u>Ecology</u></p> <p>It is contended that the vision accounts for protection of habitats and the preservation of ecology in the River Breaghagh through provision of open spaces, and green infrastructure networks which are compatible uses in the vicinity of such assets. A major strategic objective of the</p>
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		<ul style="list-style-type: none"> - It is suggested that the aspirational pedestrian / cycle route shown running east-west through Kilcreene Lodge lands, would be better routed along the southern bank of the River Breaghagh, along the river corridor similar to the old Loughmacask LAP's vision for the green infrastructure network. <p>Ecology</p> <p>Neither the ecological value of the River Breaghagh Valley or the importance of protecting habitats feature in the Masterplan's Vision (Chapter 2) or in its Principles and Strategy (Chapter 5).</p> <p>Reference is also made to section 6.8.1.3 of the Kilkenny City and County Development Plan 2021-2027 which notes the Council will promote the natural amenity potential of the River Breaghagh to facilitate development of amenity, biodiversity and tourism benefits for the city.</p> <ul style="list-style-type: none"> - It is stated that the Masterplan is very much development orientated and takes little account of preserving the existing ecology. References to the green network are primarily concerned with connectivity to public open space. - The Masterplan fails to address sufficiently the sensitive nature of the ecology within the River Breaghagh and the Nore Valley's. - The plan does not go far enough in seeking to protect the natural heritage of the area. - Reference is made to section 6.3 and the development of the River Breaghagh Park, it is submitted that the ecological impact of this proposed development has not been clearly considered in the plan. 	
13	Marian Ryan	The submission primarily concerns traffic congestion and road infrastructure. The following points were made:	<p>Interim Chief Executives Response:</p> <p>Current traffic congestion issues and the urgent need for additional mobility infrastructure in the area are recognised.</p>

		<ul style="list-style-type: none"> - Before permission for the school or housing developments were permitted the route of a road should have been decided. - The Tullaroan Road is already overused by lorries, HGVs and tractors from the fertiliser factory, grain store and quarry. There is a continuous flow of cars on it at peak times. - Allowing cars from hundreds of additional houses along with a large school will add to traffic problems in the area (Lord Edward Street, Granges Road and Freshford Road). - It is suggested the traffic going to and from the new neighbourhood centre will lead to a bottleneck. - A solution must be found and there has to be access for emergency services and ambulances. - It is suggested that a road be made from the Grasslands factory to the new Ballycallan Road. - It is suggested to connect the Freshford Road to the Tullaroan Road and the Ballycallan Road as part of the outer ring road and this doesn't require the bridge over the Nore to the Castlecomer Road which can be finished at a later stage. 	<p>The Council proposes to address the phasing of future development so as to align same with relief infrastructure provision. See response to submission no. 6 and 7, 11,36,42.</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission no. 6 and 7, 11,36,42.</p>
14	Sheila Kelly	<p>Reference is made to the public meeting at Dicksboro GAA Club in relation to the Masterplan where serious concerns were expressed by residents in relation to:</p> <ul style="list-style-type: none"> - A lack of provision for a new upgraded road structure to cater for increased traffic volumes due to planned new housing schemes and the new 1000+ student secondary school. - The plan overlooking the amount of HGV traffic in the area which is already causing serious congestion. Congestion will get considerably worse on completion of new housing developments and the school. - Traffic calming measures should be put in place on the Freshford Rd, Dunningstown Rd and Tullaroan Rd due to the extent of farm machinery using these routes and to ensure safety for residents in the area. 	<p>Interim Chief Executives Response:</p> <p>See response to submission no. 6 and 7, 11,36,42.</p> <p>The Council will consider whether additional traffic management measures/interventions would mitigate the impact of additional traffic from already approved developments within the plan area on the wider transport network. This includes measures to counter peak hour use of internal streets in the Butts (rat running). The Council will consider what traffic management interventions can assist in the reduction/elimination of such rat running into the Butts at such peak traffic times.</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission no. 6.</p>

		<ul style="list-style-type: none"> - Further developments at St. Canice's School and Loreto Secondary School along with proposed residential developments (circa 700 houses) in the area will lead to an extra 1,000+ cars using the existing local road infrastructure which suggests a lack of planning for roads infrastructure to cater for the developments. - The completion of the R7, connecting the Tullaroan Rd, to Kilmanagh Rd and Freshford Rd must be fast-tracked. 	Include an objective to consider what additional traffic management measures could be implemented to mitigate the impact of additional traffic from already approved developments within the plan area on the wider transport network and reduce/eliminate the use of internal streets in the Butts (rat running) at peak hours.
15	Tom & Kathleen Morkan	<p>The submission addresses traffic congestion and road infrastructure in the Masterplan area. The following points were made:</p> <ul style="list-style-type: none"> - The draft plan has made no provision for roads leading to and from the new CBS school and proposed new housing. - The ability of residents to gain access to their properties will be seriously compromised on various routes leading to and from school. - Residents will be unable gain access to their properties or gain access from the Dunningstown Road onto the Granges Road which is very difficult at present during school times. - Changes to the road network should be made before the new school is completed. - The Masterplan is opposed until such time as an acceptable road plan is approved. 	<p>Interim Chief Executives Response:</p> <p>See response to submission no. 6 and 7, 11,36,42.</p> <p>The new CBS school was granted permission on its own merit and with due regard to the potential traffic impact its granting would have. Current traffic congestion issues in the Masterplan area are noted and while it is acknowledged that additional connecting road infrastructure may be required, there will also be a process to promote and develop active travel options that should contribute towards reducing private car trip generation over time.</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission no. 6.</p>
16	Enda Morrissey	Reference is made to lands being purchased by CPO that were previously owned by Patrick Cantwell (deceased) in folios KK500 and KK496. It is submitted that if housing is going in to adjoining property a substantial wall is needed.	<p>Interim Chief Executives Response:</p> <p>The Butts neighbourhood and adjoining amenity sports grounds will be designated as a "Special Regeneration Area" within the plan.</p>

			<p>All “Opportunity Sites” will be re-classified as “Sites for Consideration” and a new objective for this “Special Regeneration Area” shall be included in the Masterplan, which will read as follows:</p> <p>“No proposal for housing development shall be brought forward for statutory planning approval by the Council within the Butts “Special Regeneration Area” as delineated until such time as there is proactive engagement with the residents and stakeholders on the specific development proposal(s).”</p> <p>Interim Chief Executives Recommendation:</p> <p>Amend the Draft Masterplan maps to identify the extent of the “Special Regeneration Area” as outlined in blue below.</p>  <p>“Potential Regeneration Sites” described in figure 6.2 will now be classified as “Sites for Consideration”.</p> <p>Include an objective in section 6.1 to read as follows “No proposal for housing development shall be brought forward for statutory planning approval by the Council within the Butts “Special Regeneration Area” as delineated until such time as there is proactive engagement with the residents and stakeholders on the specific development proposal(s).”</p>
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17	Kieran and Anne Carroll	<p>The submission raises concerns in relation to flooding, CBS school development, road infrastructure and traffic. The issues raised are outlined under each heading below:</p> <p><u>Flooding</u></p> <ul style="list-style-type: none"> - The outline of Loughmacask shown on maps is the size in summertime. - Water from the surrounding land drains into Loughmacask which does not have an outlet like a stream. The water gradually seeps into the water table. The level rises over the autumn, winter and early spring peaking in March/April. - The water level has risen above the level of the roadway on Lousybush Lane for many years and into the field across the lane. The road was impassable by car and on foot. - Unlike the Waterbarrack which floods when the water level in the Breaghagh rises, it can take months for the water level in Loughmacask to drop. - Development in the field across Lousybush Lane must not compromise Loughmacask i.e., run off of oil from roadway, housing etc. <p><u>CBS School Development</u></p> <ul style="list-style-type: none"> - The site is too small to facilitate increase in numbers, there should be sufficient space to allow expansion of buildings and outdoors. - The provision of playing pitches is inadequate. There should be provision for other sports such as soccer, and rugby to cater for the diverse needs of the student population. - There will be further demand for school places and provision of facilities due to the level of housing planned in the area. - There should be provision for special needs students, music facilities, practical subjects and laboratories. - There should be appropriate drop off facilities on surrounding roads allowing students walk to school 	<p>Interim Chief Executives Response:</p> <p>See response under the headings below:</p> <p><u>Flooding</u></p> <p>Each permitted housing development has undergone flood risk assessments as part of the application process. Mitigating against flood risk has been incorporated in the design of existing schemes, along with the protection of Loughmacask (see application ref 10/15). The design for the school road allows for the movement of water naturally by the use of drains/gullies.</p> <p>Historic permissions are in place adjacent to the Lough and these had regard to the potential for high water levels in Loughmacask. All future applications will have due consideration of the levels in Loughmacask. Surface water gullies will direct water away from the Lough by the use of SuDS.</p> <p><u>CBS School Development</u></p> <p>Responsibility for acquisition and development of school facilities lies with the Department of Education. It is considered sufficient lands are zoned to include for expansion of facilities should needs arise. The Council will continue to liaise with the Department of Education in identifying suitable lands to cater for future school needs.</p> <p>An additional objective has been included to provide connectivity between R6 (school access road) and the Tullaroan Road. This will facilitate access to the school and access to the Freshford Road from the Tullaroan Road. The provision of additional active travel infrastructure is a priority for the council.</p> <p><u>Roads Infrastructure / Traffic</u></p> <p>The plan does not propose HGVs to access the school road as there is currently no clear proposal for through traffic. However, the Council will continue to pursue funding for other road projects identified in the plan to alleviate traffic</p>
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18	Mike Donohoe	<p>The Council is thanked for presentations on the Masterplan and for issuing a summary to each household. However, there are some concerns in relation to traffic and road infrastructure. These are outlined below:</p> <ul style="list-style-type: none"> - There is a lack of joined up thinking between the Central Access Scheme, the Outer Ring Road and the Masterplan. - Originally Lousybush Lane was to be upgraded for all traffic types, providing part of the Central Access Scheme, Phase 3. The plan seems to have scrapped that in favour of a cycle/pedestrian only route. Its sole function is now to provide access to the new CBS and a cluster of houses at the end of the lane. - The high volume of traffic on Granges Road and Freshford Road is referred to especially at school drop-off / pick-up times. This is exacerbated by the expansion of St. Luke's Hospital and heavy trucks from PRL, Glanbia and others. - Scrapping phase 3 route via Lousybush Lane removes a proposed route from Freshford Road to the Western Environs providing no alternative to access other areas without transiting through the city centre. 	<p>Interim Chief Executives Response:</p> <p>Objective R5/ phase 3 of Central access Scheme in the 2014-2020 City and Environs Plan was to connect from Lousybush lane to the new Breaghagh Valley. This link was removed in the 2021-2027 City and County Development Plan. To remove through traffic from the Loughmacask area this objective was replaced by objective R7, which aims to connect the Freshford Road to the Kilmanagh Road via an inner orbital route and which is a priority for the Council. Also see response no. 6 above.</p> <p>It is also now proposed to investigate how R6 can be best connected to the Tullaroan road.</p> <p>Lousybush Lane will at least in part function as an active travel route which could at a later stage accommodate public transport, subject to review in the Sustainable Urban Transport Plan (KSUMP).</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission no. 6.</p>

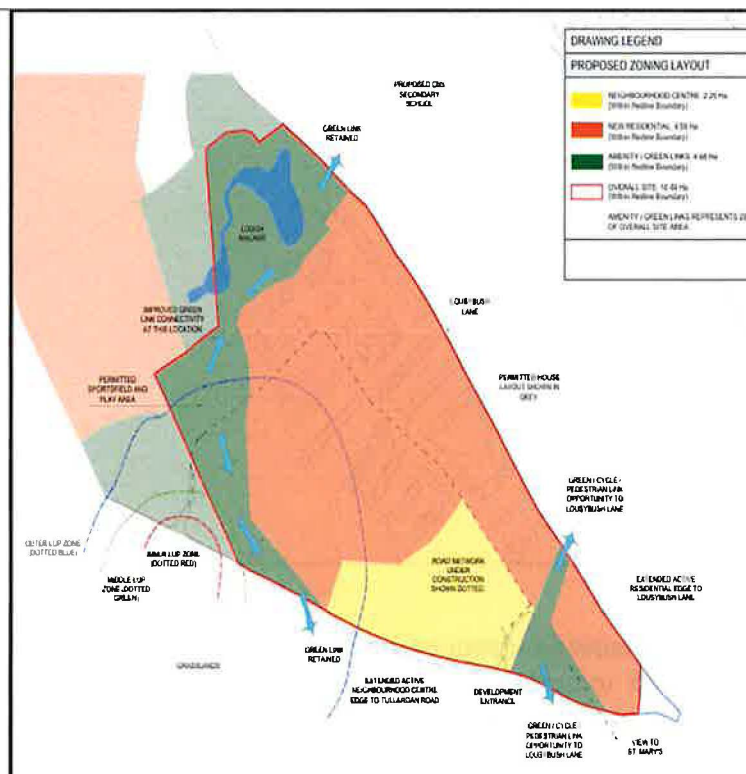
		<ul style="list-style-type: none"> - Priority should be given to the Western Bypass linking Freshford Road to the Tullaroan Road and onwards to the Ring Road. This would relieve traffic and improve pedestrian and cycle access to the city centre. - Consideration should be given to an alternative entrance route for the new CBS (possibly from the Tullaroan Road) as the upgrade of Talbot's Gate link road no longer forms part of the Central Access Scheme. 	
19	Phil Comerford	<p>See contents of submission numbers 7, 11, 36 and 42 above. In addition to the points raised within same it is requested that:</p> <ul style="list-style-type: none"> - The council to consider using the development land between the Tullaroan Road and the rear of the proposed new CBS as alternative construction road for the school. - The proposed road which is to be the Talbots Gate / Court road is causing great concern to residents that feel no proper alternatives have been considered to overcome this issue. 	<p>Interim Chief Executives Response:</p> <p>See response to submission no. 6, 7, 11, 36, 42 above.</p> <p>Construction access to the school site will be a matter for the contractor and subject to a construction management plan.</p> <p>In addition, the school will be accessible to pedestrians / cyclists via the active travel route proposed on the Lousybush Lane.</p> <p>To include an objective "to investigate, how the R6 can be connected with the Tullaroan Road subject to appropriate traffic management regime."</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation to no. 6 above.</p>
20	James and Mary Delaney	<p>The submission was submitted in the interests of public safety. The following points were raised:</p> <p><u>Social Housing and Traffic Congestion</u></p> <ul style="list-style-type: none"> - Adding further social housing on three sides of the Butts will exacerbate traffic mayhem and chaos in the area. - The proposal to build up the Butts further is opposed as there is already over 450 houses sanctioned on the Tullaroan Road, along with the new CBS school and extensions to existing schools. 	<p>Interim Chief Executives Response:</p> <p>The response is addressed under the following headings:</p> <p>See also response to submissions no. 6 and 16.</p> <p><u>Social Housing</u></p> <p>The Butts neighbourhood and adjoining amenity sports grounds will be designated as a "Special Regeneration Area" within the plan. All "Opportunity Sites" will be re-classified as "Sites for Consideration" and a new objective for this "Special Regeneration Area" shall be included in the Masterplan, which will read as follows: "No proposal for</p>

		<ul style="list-style-type: none"> - The application to CPO private ground at St. Josephs Road with a view to erect social housing must be addressed with residents. The lane is a private right of way not a public right of way. The owner / joint owners of this land should be consulted. - Connolly Street and Josephs Road cannot take more traffic. - Entering and exiting Bishops Meadows safely is dangerous due to acute bend and high levels of traffic on the Freshford Road. Traffic at school peak times on this road is overwhelming. - Adding additional traffic (i.e., new school) on this route is undesirable. - Vicar Street becoming one way will lead to more congestion. - Additional traffic through the Freshford Road and the Butts area will increase noise and air pollution for residents. - As the Transport Plan being carried out for the City is not ready it hinders one making an informed decision on the Masterplan. <p><u>Road Infrastructure</u></p> <ul style="list-style-type: none"> - The completion of the N7 should be a priority and must be completed before any further development in the Loughmacask / Butts area. <p><u>Access to Seveso Site</u></p> <ul style="list-style-type: none"> - There may be undesirable consequences for Major hazard response times, should there be an incident at Grasslands. - Seveso site on the Tullaroan Road use Butts Green and Lord Edward St, to execute the major hazard plan for the site. - First responders require timely access through these routes. - Provision for an incident at peak times needs to be planned and prioritised by the Council in the interest of public safety. 	<p>housing development shall be brought forward for statutory planning approval by the Council within the Butts “Special Regeneration Area” as delineated until such time as residents and stakeholders have been consulted on the specific development proposal(s).”</p> <p><u>Traffic Congestion / Roads Infrastructure</u></p> <p>Current traffic congestion issues and the urgent need for additional mobility infrastructure in the area are noted. Regarding the number of housing units permitted it should be noted that circa 650 units have permission in the Masterplan area, 340 of which will gain access off the Tullaroan Road.</p> <p>The provision of R7 is a priority for the Council and will remove heavy traffic from the Tullaroan Road and Lord Edward Street as well as providing an orbital connection for the North Western Quadrant of the City.</p> <p>In addition, a range of active travel measures will be introduced following identification post the SUMP process</p> <p>The Council will continue to pursue funding for road projects identified in the plan including the Northern Ring Road (R1) extension from the Freshford Road to the Castlecomer Road.</p> <p><u>Access to Seveso Site</u></p> <p>The Health and Safety Authority were consulted regarding the contents of this plan. No concerns were raised in relation to accessibility to the Seveso site in the case of an incident. Provision of the new link roads outlined above will also ensure this site is more accessible in the case of an emergency.</p>
			<p><u>Interim Chief Executives Recommendation:</u></p> <p>See recommendation to submission no. 6 and no. 16 above</p>

21	Sean Breathnach	<p>The submission is largely positive in relation to the benefits of this plan which include provision of pedestrian and cycling infrastructure, amenity green space, wildlife conservation, biodiversity, sporting facilities and housing.</p> <p>A range of comments are made in relation to traffic in the area and it is submitted that:</p> <ul style="list-style-type: none"> - The plan has overlooked the level of HGV traffic using the roads adjacent to the Loughmacask area. Reference is made to the congestion caused by HGV's using PRL, Grasslands and others on the Freshford Road, Dunningstown Road and Butts Green particularly in Spring and Autumn. - Congestion at schools only occurs at opening and closing times, and for almost a quarter of the year it is not a problem as they are closed. - However, drop off points for the new CBS are important. - Buses should be made access the school by means of the link road from PRL. - The city bus service should be encouraged to extend their route to the school using the link road. - It is of utmost importance that a link be made from Callan / Kilcreene Road to the Tullaroan Road and this should be constructed in conjunction with future developments in the area. - Necessary steps should be taken immediately to continue the Ring Road to the Freshford Road and beyond diverting much of the traffic from the problem areas. - The long-term benefits of the plan greatly outweigh the short-term complaints about traffic. 	<p>Interim Chief Executives Response:</p> <p>Current traffic congestion issues and the urgent need for additional mobility infrastructure in the area are noted. The Proposed R7 will remove HGVs from the Tullaroan Road and Lord Edward Street. The connection from the Tullaroan Road to the Kilmanagh Road will be prioritised. Also see response to submission 6 above</p> <p>The Road to the School (R6) has been granted planning permission and will be constructed as granted. Traffic management measures for the junction of the R6 with the Dunningstown Road have been incorporated into the Road Design.</p> <p>A drop off point is available in St. James' Park and is working well. This drop off point can potentially be used for all the schools in the area. Future city bus routes will be considered in the Kilkenny Sustainable Mobility Plan (KSUMP). Inclusion of drop off points on the Tullaroan Road are not considered to be suitable as they are likely to increase congestion on Lord Edward Street.</p> <p>The Northern Ring Road extension from the Freshford Road to the Castlecomer Road (R1) remains a priority.</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission 6.</p>
22,40	Michael Cullinane, Marie Cullinane	<p>The submission refers to section 6.2 of the plan which states a route selection process will be undertaken to determine the most appropriate route for a new road to connect the R695 (Kilmanagh Rd) to the R693 (Freshford Rd).</p> <ul style="list-style-type: none"> - Identification of the area for R7 is welcomed, however a similar route should be identified to connect the 	<p>Interim Chief Executives Response:</p> <p>See response to 6 above.</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission no. 6.</p>

		<p>Tullaroan Road with the Freshford Road in view of the following:</p> <ul style="list-style-type: none"> - 400 houses already approved will be exiting on to the Tullaroan Road. - 300 houses approved / in planning process with exits onto Granges Road which is already under pressure with traffic at school pick-up and drop-off times. - New CBS secondary school will lead to major pressure on the already busy Granges and Freshford Roads. - Equal if not greater priority should be given to finding a route connecting the Tullaroan Road with the Freshford Road which should also have a set down area near the new school to avoid using the Freshford Road particularly in bad weather when cycling / walking will not happen. - Access to St. Luke's Hospital emergency services will be impacted at school drop-off / collection times and may result in loss of valuable time getting to services. - Urgent priority should be given to identifying a route and putting in place a new road from Kilcreene Hospital on Kilmanagh Road to as near as possible to Grassland Fertilisers on the Tullaroan Road and extending across to the Freshford Road, as near as possible to Dalton Mills. 	
23	<p>Tom Philips on behalf of Wallace Contracting in conjunction with AWN Consulting and Brian Dunlop Architects.</p>	<p>It is stated that the clients are currently constructing phase 1 of a permitted scheme in the area and are committed to fully realising the potential of the area.</p> <p>The primary purpose of the submission is to request reconfigured zonings on the lands to enable delivery of the Local Centre and provide a more attractive residential frontage to Lousybush Lane. It is considered that this can be achieved with no net change to existing zonings and without the need to vary the Kilkenny City and County Development Plan 2021-2027. However, should the Planning Authority deem such a variation necessary it is considered that there is an opportunity to expand the residential zoned lands in the area, while also delivering on the open space and green linkage objectives in the Masterplan.</p>	<p>Interim Chief Executives Response:</p> <p>The Health and Safety Authority (HSA) have advised no changes have been made to the risk zones around the Seveso site. Accordingly, based on HSA designations, no changes to the plan can currently be considered.</p> <p>Notwithstanding this, it is considered that a sufficient quantum of land has been allocated for residential purposes within the Masterplan area. In accordance with CE's response to submission 6, no additional quantum over and above that already granted by An Bord Pleanala will be allowed within the Masterplan area until the requirements associated with the delivery of objective R7 has been achieved.</p>

		<p>This is supported by a study (report included with the submission) undertaken by AWN, based on updated advice from the HSA, demonstrates that the extent of open space zoning around the Grassland Fertiliser facility is no longer required based on the updated risk-based assessment approach. The report uses updated guidance from the HSA regarding land use planning near hazardous installations, and specifically as it relates to Grassland Fertilisers facility. A non-technical summary of this report is also included with the submission.</p> <p>Previously, development parameters advised against residential, office and retail development in zone 2, which resulted in a significant amount of open space being zoned to reduce potential risk in the event of a major incident. A figure outlining the risk zones is overlaid on the land use zoning map from the 2008-2014 Louhmacask LAP.</p> <p>The risk-based approach now adopted by the HAS means the 4 zones used previously is now 3 zones. These are called an inner, middle and outer zone. These are illustrated in a figure contained in the submission.</p> <p>HSA guidance that informs the AWN study highlights that residential, retail and community uses are appropriate in Middle and Outer zones. This reduces the extent of land effectively ruled out for development previously. In light of this it is proposed to re-configure zoned lands to ensure the Masterplan is delivered more effectively and addresses previous ABP (Ref: PL10.238542) decision to refuse the Local Centre.</p> <p>It is requested to re-zone lands as illustrated below:</p>	<p>In addition, it is considered that the current location for the local centre has the ability to address concerns raised by An Bord Pleanala in the previous application.</p> <p>Interim Chief Executives Recommendation:</p> <p>No change to Draft Plan.</p>
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The rationale for relocating the local centre to a more appropriate location and expanding the residential zoning is outlined. These include addressing the irregular shape of the lands zoned for the local centre along with the reasons for previous refusal by ABP while it is submitted that the lands are ideally placed to deliver additional housing for the city with potential to provide a mixed-use neighbourhood in a sustainable edge of centre location.

A range of objectives from the NPF, RSES for the South Region 2020-2032, and the Kilkenny City & County Development Plan 2021-2027 are referred to in support of the above proposals such as achieving compact growth and efficient use of residential land.

24	Elizabeth Delehanty	<p>The submission primarily concerns traffic congestion and the lack of road infrastructure in the area to cater for the planned new school and housing developments.</p> <ul style="list-style-type: none"> - It is stated that students attending the school from the other side of the city will have to come through the city and the already congested traffic routes in the area. - Extensions to other schools in the area will also lead to increased traffic. - It is submitted that should the R7 from the Tullaroan Road to the Freshford Road go ahead it would become a rat run (like Burnchurch and Danesfort). <p>Other concerns raised are listed below:</p> <ul style="list-style-type: none"> - Local shops are more than 10 minutes away from the school for students to get lunch. - Biodiversity at Loughmacask should not be disturbed with all the development proposed in the area. - Consideration should be given to surface water from the school and the Turlough on Lousybush Lane for those using the lane to access the school. 	<p>Interim Chief Executives Response:</p> <p>The response is outlined under the headings below:</p> <p><u>Traffic and Roads Infrastructure</u></p> <p>Current traffic congestion issues in the area are noted, while it is acknowledged additional road infrastructure is required and will be prioritised, there are also many active travel measures that could assist in alleviating traffic congestion. The proposed local centre will include shops and will be located to service the new neighbourhoods within the 10-minute city concept. This will also serve the schools which will have access via the active travel corridor along Lousybush lane.</p> <p>The intention of the R7 objective is to help alleviate traffic from the built-up area / local street networks and remove HGVs from residential areas. This, in combination with an R6 connection to the Tullaroan road, will provide for increased permeability and improve safety of streets for active travel users.</p> <p><u>Biodiversity</u></p> <p>The area around Loughmacask is under development in accordance with permission 10/15 as granted by ABP. The provision of amenity in conjunction with the protection and enhancement of biodiversity is currently receiving attention.</p> <p>The plan further provides for a significant element of green infrastructure and amenity lands within the area and in the vicinity of sensitive areas such as LoughMacask and the River Breaghagh.</p> <p><u>Surface Water / Flooding</u></p> <p>Measures have been and will be included within applications to ensure flooding does not impact development.</p> <p>Interim Chief Executives Recommendation:</p> <p>No change to Draft Plan</p>
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25	Tomas Turley	<p>The Council is commended for running information sessions on the Masterplan which allowed time to study maps, presentations and enabling questions. The submission primarily concerns traffic congestion / signage and the wetland area.</p> <p><u>Traffic Congestion:</u></p> <ul style="list-style-type: none"> - Active travel routes proposed are welcomed however, the changeover to these methods will be gradual and should not be seen as a replacement for a proper road network to cater for proposed housing and school developments. - An improved road system will ensure more widespread use of cycling if cyclists can travel quickly and safely. At present this is not possible due to overly motorised roads. - Congestion will get much worse with the proposed new developments and the draft road plan. - A single access road to the school from the Freshford Road is a great weakness in the plan. There should be car access from the Tullaroan side to service the school only even on a temporary basis until the through road from the Tullaroan Rd to the Freshford Rd and going over to the Castlecomer Rd is completed given the timescale for delivery of same. - Must be provision for a safe drop off areas for students on the Tullaroan and Granges Road to minimise further congestion. - Extend the city bus services to new school / existing schools in the area reducing the need for cars. - No up to date traffic counts indicate a lack of awareness by the Council of existing high levels of traffic congestion in the area. - Traffic lights or strong clear signage is needed at Dunningstown Rd, to control traffic in the area especially at peak school times. The design of this junction should make prohibited turnings impossible. 	<p>Interim Chief Executives Response:</p> <p>The response is outlined under the following headings:</p> <p><u>Traffic Congestion</u></p> <p>It will be a priority to deliver part of the R7 route which will connect the Tullaroan Road with the Kilmanagh Road, in addition to the link being provided from the Tullaroan Road to the Freshford Road. The route selection of the R7 road is not yet decided, but will have regard to all options, including extant permissions.</p> <p>A drop off point in St. James' park already serves schools in the area.</p> <p>Inclusion of drop off points on the Tullaroan Road are not considered to be suitable as they are likely to increase congestion on Lord Edward Street. There is also an objective to connect R6 with the Tullaroan Road, subject to a traffic management regime.</p> <p>Traffic management measures for the junction of the R6 with the Dunningstown Road have been incorporated into the Road Design.</p> <p>The Council will continue to pursue funding for road projects identified in the plan including the Northern Ring Road extension from the Freshford Road to the Castlecomer Road.</p> <p><u>Wetland / Turlough / Flooding</u></p> <p>The area around the Lough Macask turlough has been the subject of previous permission 10/15 as granted by ABP. The provision of amenity in conjunction with the protection and enhancement of biodiversity is currently receiving attention. All applications must ensure flooding does not impact development.</p>
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		<p><u>Wetland / Turlough / Flooding:</u></p> <ul style="list-style-type: none"> - The wetland is one of a few in Kilkenny City and is one of only 2 listed Turloughs in the county. - Its main body is west of Lousybush Lane and its water level varies throughout the year extending to the eastern side of the lane in wetter periods. This leads to significant overflow into the school site in wet weather and this must be respected in relation to the construction of the school to ensure it does not interfere with existing natural flood movement of the waterbody. - The flood area on the eastern side of Lousybush Lane must be considered as an integral part of the Lough. 	<p>Interim Chief Executives Recommendation:</p> <p>See response to submission 6 above.</p>
26	Majella O'Neill	<p>The submission primarily concerns traffic congestion and road infrastructure.</p> <ul style="list-style-type: none"> - While the proposed CBS secondary school and new housing provision in the area is welcome there are issues regarding traffic management which will impact on a number of roads including the Freshford Road and the Granges Road. - An overall traffic management plan to ensure that existing residential areas will not be severely impacted by the new developments would be welcome. - Construction of the proposed R7 road as soon as possible would help matters greatly. 	<p>Interim Chief Executives Response:</p> <p>See response to submission 6 above.</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission 6 above</p>
27	John Hayes	<p>The submission refers to recent public consultation events in which concerns were expressed at the lack of thought and provision for those currently living in the area and the lack of provision for an adequate road structure in Loughmacask. The following points were also made:</p> <ul style="list-style-type: none"> - Identification of the R7 connecting the Kilmanagh Road with the Tullaroan Road is welcomed. - A similar route connecting the Tullaroan Road with the Freshford Road should also be considered in view of additional developments proposed in the area such as 	<p>Interim Chief Executives Response:</p> <p>Also see response to submission 6 above. It should be noted that there are already over 650 units permitted in the area in addition to the new school.</p> <p>The Road to the School (R6) has been granted planning permission and will be constructed as planned. Traffic management measures for the junction of the R6 with the Dunningstown Road have been incorporated into the Road Design.</p>

		<p>extensions to existing schools, the construction of a new school and various housing developments totalling circa 700 units which is likely to lead to over 1,050 extra cars on the local road network.</p> <ul style="list-style-type: none"> - Residents are extremely distressed many of whom are elderly and infirm. - If there is no further road infrastructure it will definitely lead to extreme congestion. - Greater priority should be given to finding a route for connecting the Tullaroan Road with the Freshford Road. - Traffic lights on the Dunningstown Rd and the absence of set down areas will lead to traffic chaos particularly in poor weather when cycling/walking to school will not happen. - Access to St. Luke's Hospital emergency services at peak school times will be impacted and add time to ambulance journeys. - Priority to be given for identifying a route for a new road from Kilcreene Hospital on the Kilmanagh Road to as near as possible to Grassland Fertilisers on the Tullaroan Road extending to the Freshford Road. <p>In summary completion of development in the Masterplan area without first installing the necessary road infrastructure, will lead to serious congestion on existing substandard roads, creating mental stress and health/safety risk for residents.</p>	<p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission 6 above.</p>
28	Kevin Donohoe	<p>The submission highlights shortfalls within the plan which include no provision for sewerage, a roads network, a green space or a shopping centre with a large footprint. The following points are also made:</p> <ul style="list-style-type: none"> - Schools are concentrated in the western part of the city while there is only one school on the other side of the city which is highly populated. This does not look like balanced planning. - There is no mention of footpaths, cycle lanes or street lighting on the Dunningstown Road as far as Hillcrest. 	<p>Interim Chief Executives Response:</p> <p>Irish Water/ Uisce Eireann (see submission no. 9 above) have stated that there is sufficient capacity available in the water and wastewater treatment infrastructure to serve / cater for the ambitions of the Planning Authority in the City / Loughmacask area for the Development Plan period.</p> <p>The Department of Education is responsible for school planning and during the City and County Development Plan process did not require additional school capacity to the East of the city.</p>

		<p>With the added traffic this needs to be transformed from a rural road to an urban road.</p> <ul style="list-style-type: none"> - Before development commences in the area a road is needed linking the Freshford Road with the Callan Road. - A new sewerage scheme is needed to cater for the uses and development proposed in the area. - The plan will create traffic jams and hinder the economy, tourism, and those walking/cycling. - It has potential to create a safety hazard given its proximity to emergency services at St. Luke's Hospital. <p>It is recommended that:</p> <ul style="list-style-type: none"> - The Plan be revised to include the building of a by-pass road to join the Castlecomer Road with the Freshford Road and a new Nore bridge before any development. - Residents should be consulted about these routes. - If long term needs of the area are identified, short term development can be built allowing other projects to be added seamlessly. 	<p>The school and access road have received permission and were subjected to Traffic Impact Assessments.</p> <p>The Hillcrest housing development falls outside the Masterplan area. The extent of future pedestrian/cycling networks will be contained in the Kilkenny Sustainable Urban Mobility Plan (KSUMP).</p> <p>Also see response to submission 6 above as regards objective 7 in the City and county Development Plan.</p> <p>The Council will continue to pursue funding for road projects identified in the plan including the Northern Ring Road (R1) extension from the Freshford Road to the Castlecomer Road.</p> <p>Interim Chief Executives Recommendation: See recommendation to submission 6.</p>
29	Joanne Cosgrove	<p>The amenity designations and innovative citizen friendly initiatives highlighted in the plan are commended. However, it is contended that:</p> <ul style="list-style-type: none"> - The plan does not adequately address the existing traffic congestion on the Granges Road. - The implementation of the plan will exacerbate the situation unless there is an upgrade in road infrastructure. 	<p>Interim Chief Executives Response: See response to submission 6.</p> <p>Interim Chief Executives Recommendation: See recommendation under submission 6.</p>
30	Martin and Angela Lalor	<p>The submission primarily concerns issues regarding traffic congestion and road infrastructure:</p> <p>The current and proposed traffic plan is not sufficient to cater for the three schools in the area. It is already saturated with traffic and the addition of a third school will make congestion even worse.</p>	<p>Interim Chief Executives Response: The Hillcrest housing development falls outside the Masterplan area. The extent of future pedestrian/cycling networks beyond the Masterplan area will be contained in the Kilkenny Sustainable Urban Mobility Plan (KSUMP) Also see response to submission 6 above.</p> <p>Interim Chief Executives Recommendation: See recommendation to submission 6 above.</p>

		<p>The inner relief road (Freshford Road to the Circular Road/Ballycallan Road Roundabout) has to be completed. The current road plan is not suitable for the anticipated traffic especially at peak times i.e. school drop off/ pick up. It is notable that not many walk or cycle to existing schools in the area at present.</p> <p>Converting Lousybush Lane to a cycle/pedestrian route will lead to further congestion on the Tullaroan Road. Dunningstown Road will also experience a significant increase in traffic which will create safety hazards for all road users.</p> <p>A footpath is needed from the junction of Granges Road/Dunningstown Road all the way to the Hillcrest Estate.</p>	
31	Mary O'Neill on behalf of Ayrfield Residents Association	<p>The existing pedestrian / cycleway through Ayrfield from Granges Road to the south side of the estate through to Lord Edward Street is not marked on the draft plan. However, the plan shows a proposed pedestrian / cycle link from an adjoining estate which is permitted but not yet built through the Ayrfield Estate. This was noted as an error at the consultation meeting of 10/10/22.</p> <ul style="list-style-type: none"> - Residents are not in favour of any additional connections between Ayrfield Estate and any proposed new developments. - The proposed new development (Planning Ref: 21/252) adjoining Ayrfield addressed this access and a condition was included to ensure a boundary between the proposed estate and Ayrfield be replaced with a masonry wall in the interest of security. <p>It is requested that the Masterplan be adjusted to exclude the pedestrian link between the two estates at this location and uphold the planning condition outlined above.</p>	Interim Chief Executives Response:
			Figure 6.3 within section 6.2 of the Plan will be amended to correctly reflect this.
			Interim Chief Executives Recommendation:
			Amend figure 6.2 to include existing pedestrian / cycle link from Ayrfield to Lord Edward Street and remove link shown from Ayrfield linking lands to the north as per condition of 21/252.
32	John Hogan	The Masterplan is generally welcomed however some reservations are made in relation to active travel, amenity and traffic congestion / road infrastructure.	Interim Chief Executives Response:
			The responses are outlined under the headings below:

		<p><u>Active Travel</u></p> <ul style="list-style-type: none"> - Ensuring active travel does not take place in isolation. - Neighboring areas should be upgraded i.e., removal of pole obstructions to cyclists on the Grange Road and provision of a safe cycle ways on all roads leading to the new school and housing developments. - Extend proposed cycle lane and paths as far as Hillcrest on the Dunningstown Road. - Opportunity to develop safe cycle/walk ways through St. James Park subject to owner's agreement <p><u>Traffic Congestion / Road Infrastructure</u></p> <ul style="list-style-type: none"> - The plan does not make sufficient provision for the traffic implications of the new school and housing developments. - Parents bringing children to school will be using already heavily trafficked roads. - The plan makes no provision for links other than cycle links from the new Callan to Kilcreene Road to the Tullaroan Road and connecting to the Dunningstown Road and Freshford Road. - Dunningstown Road residents will be forced to use the heavily trafficked Butts area to access the planned local centre. - Plan is over reliant on active travel and makes minimal provision for vehicular traffic. - Traffic jams of E-cars are envisaged at Butts Roundabout in 2035. <p><u>Amenity</u></p> <ul style="list-style-type: none"> - Ironical that greyhounds have a dedicated track for running while students don't. <p>It is asked that the plan be revised to make adequate provision for active travel and vehicular traffic implications of the projected population increase in the area. It needs to provide better access to and from the new school and local centre. Further consultation is also requested prior to the plan being adopted.</p>	<p><u>Active Travel / Traffic Congestion / Road Infrastructure</u></p> <p>Current traffic congestion issues and the urgent need for additional mobility infrastructure are noted.</p> <p>The Hillcrest housing development falls outside the Masterplan area. The extent of future pedestrian/cycling networks beyond the plan area will be contained in the Kilkenny Sustainable Urban Mobility Plan (KSUMP), which will set out the framework for Active Travel throughout the city.</p> <p>An additional road links (objective R7) is proposed in the City and County Development Plan 2021-2027 and are a priority for the Council. Please see response to submission 6 above in this regard.</p> <p><u>Amenity</u></p> <p>Facilities within school premises are a matter for the Department of Education to consider. It should be noted amenity / playing pitches are included at the new CBS school premises.</p> <p><u>Interim Chief Executives Recommendation:</u></p> <p>See recommendation to submission 6 above. The amended plan will be put on display again.</p>
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33	Michael and Eileen O’Riordan	<p>The submission primarily concerns flooding, traffic congestion and road infrastructure. It is submitted that many of the issues could be resolved should the long overdue ring road be completed. Comparisons are made with the M50 and the Galway Ring Road which are cited as examples of poor planning.</p> <p><u>Flooding</u></p> <ul style="list-style-type: none"> - It is submitted that Loughmacask is a Turlough and is connected to the sea. A series of questions are raised in relation to the Turlough which include: - If the council are satisfied that the grants permission in the area safeguards them from the global prediction of rising sea-levels? - If the survey undertaken on the Turlough by the CBS was available to the public? - If the council carried out their own independent survey? And if not, why not? <p><u>Traffic Congestion / Roads Infrastructure</u></p> <ul style="list-style-type: none"> - Council have not done the groundwork for safe access to the area to cater for residents or school users. The area cannot cope with current levels of traffic while additional traffic emanating from the school and circa 500 new houses will also be funnelled into the already congested roads while there is little or no provision for roads access, cycle and walking. - Parking arrangements at St. James Park do not work at present for existing schools with only a handful of cars using it. This will not work for the new school which is further away. - Safe passage to school for children is not being provided. Footpaths and cycle paths should be on all access routes not waiting for a developer to put in same. - Traffic lights need to be policed on the Granges Road/Dunningstown Road at the weather station, and a roundabout is needed to facilitate exit/entry to the Granges Road. 	<p>Interim Chief Executives Response:</p> <p>See response under the headings below:</p> <p><u>Flooding</u></p> <p>A hydrological study of Lough Macask was undertaken in 2008. Lough Macask is a seasonal water body that fills and empties with the changes in the level of the water table, being very low during summer and autumn and full in the winter. The Lough lies approximately 55m above sea level. Existing permissions took account of impact on the Lough Macask waterbody. Surveys undertaken by applicants in the area are available to the public. They can be accessed online or requested at the public counter. Surveys are reviewed by relevant sections within the council to ensure content satisfactorily addresses concerns.</p> <p><u>Traffic Congestion/Roads Infrastructure</u></p> <p>See response to submission 6 above. Traffic management arrangements are not a matter for the Masterplan. A Sustainable Urban Mobility Strategy (SUMP) is being drafted which will consider school traffic.</p> <p>It is understood that the drop off point at St. James Park works well particularly for younger children attending St. Canice’s National School.</p> <p><u>Development at Weather Station</u></p> <p>The proposed weather station development is on “existing residential” zoned lands and its development will be in accordance with the relevant statutory procedures.</p> <p><u>Amenity</u></p> <p>Playing fields within the CBS grounds formed part of an application which has been permitted. The school’s requirements were incorporated within the design which are a matter for the School and the Department of Education. It is considered a sufficient quantum of zoned land exists to cater for school expansion as needs arise in the future.</p>
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		<p><u>Development at Weather Station</u></p> <ul style="list-style-type: none"> - It is suggested that there has been a lack of consultation with the public in relation to the development earmarked for the weather station. More consultation is needed in regard to same. <p><u>Amenity</u></p> <ul style="list-style-type: none"> - CBS are only getting one playing field, after three were promised. 	<p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission 6 above.</p>
34	Kevin White	<p>The submission commends the council for many aspects of the plan which brings a considered structure to residential development in the area and provides for facilities such as a village centre, active travel infrastructure and green spaces.</p> <p>However, it is submitted that the plan falls short in relation to the progression of necessary road infrastructure to accommodate increased traffic that will arise from the proposed housing (900 units), two schools, and existing industrial facilities and farming operations in the area.</p> <p>Extracts from Chapter 10, Transport of the Kilkenny City & Environs Development Plan 2014-2020 are included with the submission with parts therein highlighted in relation to the phases of the Central Access Scheme.</p> <p><u>Road Infrastructure</u></p> <p>The following points were made in relation to road infrastructure.</p> <p>While phase 1 of the scheme has been completed it is noted that no progress has been made on the other phases and the council has not commented on this during the consultation process so far.</p> <p>The current position in relation to phase 2 of the scheme is not known and this is disappointing given its criticality for vehicular traffic.</p>	<p>Interim Chief Executives Response:</p> <p>It should be clarified that permissions exist for over 650 housing units in the Masterplan area.</p> <p>See also response to submission no. 6 above. The timeframe for this will be short to medium term, depending on funding available.</p> <p>Phase 3 of the Central Access Scheme was deleted from the City and County Development Plan 2021-2027. Objective R7 replaced this objective and aims to address the lack of an inner orbital route in the North Western Quadrant of the city. The completion of R7 is a priority for Kilkenny County Council.</p> <p>It is also proposed to include an objective for options to connect R6 with the Tullaroan Road, subject to the appropriate traffic management regime.</p> <p>A range of active travel measures are included around the school to reduce congestion, to encourage walking and cycling and thereby reducing car dependency / emissions while helping to achieve climate action goals / objectives.</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation for submission 6 above.</p>

		<p>The lack of any timeline for its completion is a significant gap which should be filled by the council as part of the consultation process for the Loughmacask Masterplan.</p> <p>The basis for re-arranging the phasing of the scheme is also questioned. Why is phase 3 now to be completed before phase 2?</p> <p>Current vehicular access to the new CBS school will add 5-6km per journey. This will create more emissions and be an unnecessary waste of fuel. It goes against the council's sustainability policies.</p> <p>Dean Street/ Watergate junction is unacceptable and together with Dean Street further upgrading works are required for this critical section of the central access route. Clarity is needed on the works involved.</p>	
35	Jimmy Walsh on behalf of Kilkenny GAA	<p>The submission concerns the provision of playing facilities for Gaelic Games in the area. It is requested that a green field site with room for two full size pitches, parking and changing facilities are provided to promote Gaelic Games for the increased population.</p>	<p>Interim Chief Executives Response:</p> <p>Facilities for provision of Gaelic Games already exist in the Masterplan area at Dicksboro GAA Club. GAA facilities also exist at St. James Park on the edge of the Masterplan area. Flexibility is required within amenity, open space and recreational lands to ensure a range of activities can be provided for. Provision has been made in the zoning to allow for the expansion of the existing GAA facilities in the area.</p> <p>Interim Chief Executives Recommendation:</p> <p>No change to the Draft Plan.</p>
37	Christopher O'Keefe on behalf of Freshford Road Residents Association	<p>The submission concerns road infrastructure and highlights some environmental considerations.</p> <p>Environmental Considerations</p> <ul style="list-style-type: none"> - Significant impacts on Natura 2000 sites (River Barrow and River Nore SAC), the Loughmacask pNHA which may occur as a result of the proposed plan 	<p>Interim Chief Executive's Response:</p> <p>The response is outlined under the following headings:</p> <p>Environmental Considerations</p> <p>An Environmental Report of the Strategic Environmental Assessment (SEA) and an Appropriate Assessment Screening and Natura Impact Report were prepared for this plan which takes account of the effects on Natura 2000 sites and on the</p>

		<ul style="list-style-type: none"> - Council failed to carry out a detailed assessment of the ecology in Loughmacask pNHA as required by the previous LAP. - More traffic may affect the environment. - No prescribed bodies have been contacted. - Case law is referred to in relation to the planning authorities' responsibilities under the Habitats Directive. - Advice / links are provided in relation to Appropriate Assessment Screening. <p><u>Road Infrastructure / Traffic Congestion</u></p> <ul style="list-style-type: none"> - Object to inclusion of elements in the Central Access Scheme. - Development is premature pending progress on the part of the outer ring road between Castlecomer Road and the Freshford Road. - Reference is made to Order (HA0/DHA0014) which notes that phases 2 and 3 of the road development shall not be carried out. - Kilkenny outer ring road has not progressed. - Reference is made to phase 1(a) development of part the Central Access Scheme and it is submitted that there was an inadequate preliminary examination in accordance with requirements of Article 120(1)(a). Layout plans of this link road are included with the submission. - An HGV management plan went out to public consultation but was not adopted by the council. - There is no traffic management plan for the City or County. <p><u>Flooding</u></p> <ul style="list-style-type: none"> - Phase 1(a) of the road scheme is referred to and it is submitted that the River Nore and Breagagh River are prone to flooding and certain parts of the scheme had been identified as being at risk of flooding, with the areas most likely to be affected including Loughmacask. 	<p>pNHA. Each subsequent development proposal will also be screened / assessed during the application process.</p> <p>The 2008 LAP did state that hydrological and hydrogeological studies would be completed, in addition to a detailed assessment of the ecology of the Loughmacask pNHA. A hydrological study was completed in 2008. The Councils carried a Habitat Survey and Mapping project of Kilkenny City in 2010, and published a Habitat Survey Report, which included an assessment of Loughmacask pNHA.</p> <p>This is a non-statutory plan, however all relevant prescribed bodies such as the Environmental Protection Agency (see submission no. 3) and Department of Environment (see submission no. 4) were consulted during the process in line with SEA and AA requirements.</p> <p>The Council are aware of its responsibilities in relation to the Habitats Directive and are satisfied the plan complies with these.</p> <p><u>Roads Infrastructure/Traffic Congestion</u></p> <p>The Phase 3 CAS Objective of the Kilkenny Central Access Scheme was removed during the County Development Plan process in 2021.</p> <p>R7 is a new objective which aims to link the Freshford road to the Kilmanagh road. A link from the Tullaroan road to the Kilmanagh Road will remove a large number of HGVs from Lord Edward Street and redirect HGV traffic onto the Kilkenny ring road.</p> <p>Also see response to submission 6.</p> <p><u>Flooding</u></p> <p>A Flood Risk Assessment was carried out and published with the Draft Plan in accordance with the Guidelines on The Planning System and Flood Risk Management.</p>
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		<p>General</p> <ul style="list-style-type: none"> - Relevant planning history is not outlined. - Loughmacask LAP is out of date and should be updated. - A Masterplan is not adequate to cater for large scale development in the area. 	<p>General</p> <p>It is not necessary to outline extant planning permissions in a Masterplan. Illustrating same on maps may give rise to confusion and provide a lack of clarity. It should be noted live applications have been reviewed and are incorporated in the plan in terms of what is being built out and likely to be developed. It is considered a Masterplan is the most appropriate instrument to guide large scale development in the area.</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission 6 above.</p>
38	Declan Lacey	<p>The submission primarily concerns traffic congestion / road infrastructure and the impact the proposed new school, and housing developments will have on the area.</p> <p>It is stated that the road network is at capacity with the Freshford Road being a major artery from the city catering for two hospitals, industrial and agricultural services. The Tullaroan Road is also busy with a major fertiliser plant and a population which is set to expand. These heavily trafficked roads lead into city streets that haven't been improved for decades.</p> <p>The consultation process should have begun prior to the development of housing which is being developed at a rapid rate. The plan is being railed through while residents are told to "suck up" the serious congestion in the long term. It is hoped the Dunningstown Road which has a population of 70 plus families and a strong farming community, will be improved and access to the city will continue.</p>	<p>Interim Chief Executives Response:</p> <p>Developments in the area which have planning permission and have commenced were permitted with due regard to previous development plan guidance. The purpose of this Masterplan is to help guide future development in the area.</p> <p>See response to submission 6 above.</p> <p>Although the plan does not aim to limit access to the city for residents of the Dunningstown Road, it is also not a traffic management tool. The Kilkenny sustainable Urban Mobility Plan (SUMP) will enhance mobility options throughout the city, including the Masterplan area.</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission 6 above.</p>
39	Simon Clear & Associates on behalf of Grassland Fertilizers and D. Walsh & Sons Ltd.	<p>The submission was prepared on behalf of Grassland Fertilisers Ltd and D. Walsh & Sons Ltd. A brief outline of their business and the extent of their activities are noted which gives rise to significant truck movements in the area.</p> <p>Contained within the submission are three appendices.</p>	<p>Interim Chief Executives Response:</p> <p>The submission is noted and Kilkenny have had regard to all the issues included. The solution to a large extent depends on the construction of Road R7, which is also referenced in the submission. See response to submission 6 above. Objective R7 will now also be an objective of the plan.</p>

	<p><u>Appendix 1</u> is a map illustration with an overview of a proposed road hierarchy for the Loughmacask area.</p> <p><u>Appendix 2</u> is drawing for a realignment design on Tullaroan Rd.</p> <p><u>Appendix 3</u> is a Traffic Safety Issue Report which was prepared by Malone O'Regan Civil Engineers (MORCE).</p> <p>It is stated that the consultants that prepared appendix 3, have a high level of expertise regarding traffic and transport and this is not addressed in the Masterplan. The report addresses the current traffic and routing issues that should be mitigated for in the Masterplan's objectives.</p> <p>It is submitted that the main issue is a substantial component of the traffic load has not been analysed in depth i.e., heavy goods / agricultural vehicle traffic. It is not reasonable to ignore such traffic which is generated by essential business traffic.</p> <p>A significant element of traffic is also generated by Dicksboro GAA club, for training and matches. This includes children being dropped off amongst commercial traffic and parking. While there is co-operation among the club and adjoining land owners this is still a significant traffic hazard and must be addressed in the Masterplan which provides no solutions despite stakeholders' engagement.</p> <p>The Neighbourhood centre has potential to generate significant extraneous traffic along the Tullaroan Road. In addition, the new housing developments permitted in the area will be using the Tullaroan Road, however the road DMURS category has not been elevated to arterial street level. It is contended that the traffic and transportation assessment underpinning the Masterplan is flawed and not in accordance with DMURS guidance. The plan should be consistent with the Kilkenny City and County Development and the omission of the road's objectives from the plan especially the R7 link is a matter of considerable concern.</p> <p>It is essential that a full traffic baseline study and a movement framework assessment be undertaken by the council to reflect existing patterns and usage by all traffic types. Failure to do this will render the Masterplan potentially subject to review. Traffic</p>	<p>A connection from the Tullaroan road to the Kilmanagh road will remove a significant amount of HGV movement from Lord Edward Street and the city. The future completion of the link from the Tullaroan road to the Freshford road and the link from the Freshford to the Castlecomer road will remove HGVs through traffic from the city altogether.</p> <p>The upgrade Tullaroan Road to arterial street can only be considered once R7 is fully delivered. In addition the Council will continue to pursue funding for the completion of the ring road extension R1 and bridge from Castlecomer to Freshford Roads.</p> <p>Any application for the neighbourhood centre will be subject to a full Traffic Impact Assessment.</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission 6 above</p>
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visiting Grassland and D. Walsh Grain Facility is predominantly HGVs and this is a reality that cannot change and needs to be considered in greater detail.

In summary the **MORCE traffic safety report** identifies:

- Concern for the health and safety of users at Dicksboro GAA Club with the level of traffic circulating there creating a hazardous environment. There is conflict on the Tullaroan Road between the nature of commercial operations and users of the growing GAA club.
- Expansion of facilities at the GAA club, including provision of a neighbourhood centre, will generate significant additional traffic on the Tullaroan Road.
- The Tullaroan Road will have a significantly elevated function yet it is designated a standard link-street, which has insufficient capacity and carriageway cross section to safely accommodate existing and future traffic. It should be an arterial street with additional traffic control measures.

The submission suggests an elevation of the DMURS category for the Tullaroan Road to Arterial Street, linked to a fully provided ring road with a local solution similar to that designed by MORCE in their report (Appendix 2) to alleviate hazards at Grasslands allowing the Tullaroan Road to function safely.

It is requested that the council engage with government to release funds for the extension and completion of the western bypass under LIHAF as a matter of urgency. While this road is outside the Masterplan area it is essential for the safe and effective operation of the new neighbourhood at Loughmacask and for the city.

The approach to delivery of infrastructure is not consistent with the recent infrastructure provided for the Breaghagh Valley which was built prior to commencement of housing.

The key areas of the plan in need of review regarding traffic and transportation include:

- Traffic observations and arterial road classification: Upgrade Tullaroan Road to Arterial Route and provide a link route

		<p>connecting R695 to Tullaroan Road. Appendix 1 includes details.</p> <ul style="list-style-type: none"> - <u>Omission of objective R7 in the KCCDP from the Masterplan:</u> Clarification of road / street classification is required. MORCE outlined a route for R7 that provides a range of benefits which are listed i.e. removing HGVs from existing routes. - <u>Timeframe for Western Bypass R1:</u> Timelines are requested for initiation of route locations for R1, and its completion. Timelines for initiation of route locations for R5 and R7, and their completion. - <u>Greater detail is needed</u> in relation to road design, categorisation, traffic volumes, and transition zones to provide clarity for future infrastructure. - <u>Requirement for Movement Framework Assessment.</u> Greater detail is needed to address traffic congestion. - <u>Traffic safety issues on the Tullaroan Road.</u> Any road proposals will need to address traffic speed, walking/cycling on a road with significant HGV traffic, parking at Dicksboro GAA, seasonal traffic patterns. <p>Some solutions are suggested in relation to traffic safety which include providing:</p> <ul style="list-style-type: none"> - A transition zone on the Tullaroan Road on approach to city - A link road from Tullaroan Road to R695 - A link road from Tullaroan Road to Freshford Road <p>To conclude it is stated that Grasslands is properly zoned and has no conflict with the expansion of the city and wishes to be accommodated to continue its contribution to the economy. The Bypass should not be put on the long finger and is required urgently.</p> <p>The plan should be consistent with the KCCDP and the omission of statutory roads objectives (i.e. R7) is a considerable concern.</p> <p>Finally, it is re-iterated that the Tullaroan Road should be elevated to a Key Arterial Street and incorporate the local traffic design solution provided by MORCE and outlined in the appendices.</p>	
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41	Susan Fahy	<p>The submission relates to lands at Crokershill, Kennyswell Road in the Masterplan area. A good portion of this land is in private ownership while a portion owned by the council is to be developed for social and affordable housing.</p> <p><u>Road Infrastructure</u></p> <ul style="list-style-type: none"> - The line on the map earmarked for the R5 is the demarcation line between privately owned land, and the councils land. - Eircode R95 E6X4 is referenced which the council proposed to compulsory purchase some years ago but subsequently withdrew due to the economic crash. - Consideration was given to building a house for a family member within the site but it was advised that planning would not be granted as it was premature to the council's decision on the route of the road. Due to lack of action from the council our family has been in limbo in relation to development of this site. - Frustration is expressed that the council can control the future of lands in private ownership over a long period through lack of decision making or action. This is denying people the opportunity to build on the land or gain from a potential sale. - While the traffic congestion on the Kennyswell Road is acknowledged and likely to get worse it is submitted that the R5 Inner Relief Road is outdated and would become a rat run for traffic. Plans to complete the outer ring road (R1) are noted however it is submitted that R7 is a more practical loop at this stage. - Main focus of the plan is the building of a new school for the CBS in an already congested area for traffic, overall decisions made should improve the traffic situation for the area. <p><u>Active Travel and Amenity</u></p> <ul style="list-style-type: none"> - Designated walking and cycling routes proposed are admirable. - It is pointed out that naming the green area of Crokershill as 'River Breagagh Park' is aspirational and misleading as these lands are in private ownership. 	<p>Interim Chief Executives Response:</p> <p>See response under headings below:</p> <p><u>Road Infrastructure:</u></p> <p>While acknowledging frustration in relation to development of the lands at Crokershill, the inclusion of R5 remains an important connection which the council hopes to deliver in the medium term. Therefore, any development on the site referred to would remain premature.</p> <p>Completion of the link roads and the active travel routes outlined in the plan will help to alleviate concerns in relation to traffic congestion.</p> <p><u>Active Travel and Amenity</u></p> <p>The Council is aware the lands referred to are in private ownership. Given its proximity to the River Breagagh the land has restricted potential and the most appropriate land use at this location is for amenity / open space purposes.</p> <p>Interim Chief Executives Recommendation:</p> <p>No change recommended</p>
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43,44,45,46,47,48,49,50,51,52,53,54,55,56,57,58,59,60,61,62,63,64,65,66,67,68,69,70,71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86,87,88,89,90,108,109,110,111,112,114,115,116,117,118,123,124,126,127,128,130,131,132,134,135,141,142,146,152,153,154,155,156,157,158,159,160,161,162,163,164,165,166,167,168,169,172	Various	<p>The submissions raise 4 no. concerns in relation to traffic congestion and roads infrastructure in the area.</p> <ol style="list-style-type: none"> 1) No provision of road infrastructure to cater for construction traffic or the extra (1,000+) cars per day likely to use the Freshford / Granges / Tullaroan Roads. 2) No plan to extend the road currently ended at Talbots Gate to connect with the road network at the Kilcreene road roundabout to take traffic out of the city. This road will also now be servicing the new proposed CBS school adjacent to the Dunningstown Road. 3) No regard in the plan for the current daily traffic congestion in the area arising from nearby schools. Congestion is further increased by heavy goods vehicles (HGV's) servicing PRL, Chancellors Mills, Glanbia, Grasslands and other businesses in the locality. 4) No mention of any works to improve / alleviate access to the Sycamores Aylesbury estate in light of the works and ensuing traffic situation or implications for emergency access to St. Luke's Hospital. <p>Completion of works proposed in the plan without first installing the necessary road infrastructure, will lead to serious congestion of already substandard roads, create mental stress and bring serious health and safety risks to children and families in the area.</p>	<p>Interim Chief Executives Response:</p> <p>Current traffic congestion issues and the urgent need for additional mobility infrastructure in the area are noted.</p> <p>The solution to a large extent depends on the construction of connecting Road R7 as an inner orbital route.</p> <p>See response to submission 6 above.</p> <p>The Council will continue to pursue funding for road projects identified in the plan including the Northern Ring Road extension from the Freshford Road to the Castlecomer Road.</p> <p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission 6 above</p>
92,93,94,95,96,97,99,100,101,102,103,104,105,106,107,119,120,121,122,125,129,133,136,137,138,139,143,144,145,147,148,149,150,151,174	Various	<p>The submissions are mainly concerned with road infrastructure, traffic congestion and parking. There are also some concerns in relation to access for emergency services to Walsh's Fertilizer plant, the privacy of Pearse Street residents, and zoning at St. Josephs Road. The main points are outlined under the headings below:</p> <p><u>Traffic / Roads</u></p> <ol style="list-style-type: none"> a) Oppose the plan due to lack of road infrastructure regarding the Seveso Major Disaster plan. There is not sufficient infrastructure in place to execute this plan at peak traffic times. The N7 has to be completed before executing the Loughmacask Plan in the interest of public safety. 	<p>Interim Chief Executives Response:</p> <p>The response will be addressed under the following headings:</p> <p><u>Traffic Roads</u></p> <p>See responses to submissions 6 and 16</p> <p>The solution to a large extent depends on the construction of Road R7 as an inner orbital route.</p> <p>In relation to emergency access to the Seveso site, it should be noted that the HSA were consulted and no concerns were raised regarding accessibility. In addition, the</p>

		<p>b) There is not sufficient detail in relation to developing rear of Connolly Street to make an informed submission. There is currently no vehicular access to said site.</p> <p>c) Pearse Street has major traffic problems, including poor parking facilities, with rat running from the Tullaroan Road at peak times. There are also great delays in driving onto Butts Green, especially at peak times and this will get worse when nearby developments are completed.</p> <p>d) St. Joseph's Road has major traffic difficulties with rat running at peak times.</p> <p>e) Traffic delays and parking on the Butts Green is chaotic. How will emergency services execute their plan should a major accident occur at Walsh's Fertilizer plant?</p> <p>f) Lord Edward Street is renowned for parking and traffic problems, particularly at peak school times with residents having to leave 30 minutes earlier to drive to the Callan Road.</p> <p><u>Zoning</u></p> <p>g) Residents feel very strongly about retaining current zoning at St. Josephs Road. This area belongs to the people of the Butts Community.</p> <p><u>Other / Miscellaneous / General</u></p> <p>h) Pearse Street residents have concerns regarding high-rise development on Lord Edward Street site, which would impact on their privacy.</p> <p>i) More detail of plans required for the Butts.</p> <p>j) Anti-social behaviour continues</p> <p>k) Respect the Waterbarracks.</p>	<p>proposed routes outlined above will improve accessibility to the site.</p> <p>It will be Kilkenny County Councils objective to investigate whether traffic management interventions along Lord Edward Street, Connolly St, Pearse St and St Joseph's road could improve traffic flow.</p> <p><u>Zoning/Other/Miscellaneous/General</u></p> <p>The Butts neighbourhood and adjoining amenity sports grounds will be designated as a "Special Regeneration Area" within the plan. All "Opportunity Sites" will be re-classified as "Sites for Consideration" and a new objective for this "Special Regeneration Area" shall be included in the Masterplan, which will read as follows: "No proposal for development shall be brought forward for statutory planning approval by the Council within the Butts "Special Regeneration Area" as delineated until such time as there is proactive engagement with the residents and stakeholders on the specific development proposal(s)."</p>
			<p>Interim Chief Executives Recommendation:</p> <p>See recommendation to submission no. 6 and 16 above.</p>
91	Kay Brennan	<p>Building housing with no infrastructure or traffic management plan will impact traffic on the Freshford Road, Granges Road, Butts Green and St. Canice's Parish in general.</p> <p>- Concern is raised in relation to public safety and access / regress to homes in the area which is difficult at present.</p>	<p>Interim Chief Executives Response:</p> <p>See response to submissions 6 and 16 in above.</p> <p>There is no table 2.3 in the Masterplan. Table 2.3 in Volume 2 of the Kilkenny City and County Development Plan 2021-2027 relates to development of land in the Breaghagh Valley. This does not relate to the Loughmacask area.</p>

		<ul style="list-style-type: none"> - There is an urgent need for housing yet two houses are being demolished in the Butts. - More clarity is required with reference to table 2.3 in the Masterplan. 	Interim Chief Executives Recommendation: See recommendation to submissions 6 and 16 above
98	Chris Kelly	<p>The submission welcomes the planned development of the new CBS school, shopping centre and additional housing in the area. It is stated that the cycle and footpaths are a wonderful addition along with the development of the local natural habitat.</p> <p>However, concern is raised in relation to the volume of HGV traffic on the existing road network in the area. It is contended that this has not been considered in the plan and should be addressed with an amendment to fast track the development of the R7 road linking the Tullaroan Road to the Kilmanagh and Freshford Roads.</p>	Interim Chief Executives Response: See response to submission 6 above.
			Interim Chief Executives Recommendation: See recommendation to submission 6 above.
113	Brendan Graham	<p>The submission welcomes the building of the CBS school, cycling routes / walkways and the proposals to develop the area which will provide a sense of village / community, preserve the turlough and protect the area as a nature reserve.</p> <p>Great concern among residents in relation to the traffic management plan. Contended that it is inadequate and will make traffic congestion worse. To get greater "buy in" the council should:</p> <ul style="list-style-type: none"> • Provide a commitment to prioritise the development of the R7 route linking the Callan, Kilmanagh, Tullaroan & Freshford Roads. • Provide a realistic timeframe for completion of the road. 	Interim Chief Executives Response: See response to submission 6 above.
			Interim Chief Executives Recommendation: See recommendation to submission 6 above.
140	John Brennan	<p>The submission objects to the</p> <ul style="list-style-type: none"> - Demolition of two houses on Connolly Street, The Butts - Demolition of the boundary wall on St. Josephs Road. 	Interim Chief Executives Response: See response to submission 16 above
			Interim Chief Executives Recommendation: See recommendation to submission 16 above.

170	Reclaim "The Butts" Community Group	<p>A range of issues are addressed in the submission which primarily relate to traffic congestion / road infrastructure, loss of community land and demolition of housing. The contents of this submission are supported by six pages of signatures.</p> <p>It is stated that the communities concern in relation to the Part VIII proposal of rezoning land at St. Joseph's Road in 2016 still stand. They are traffic chaos, and safety concerns regarding anti-social behaviour. It is contended that the council has not tried to rectify these issues. St. Josephs Road will become a rat run due to plans to open up the green area behind Connolly Street.</p> <p>The group vehemently oppose:</p> <ul style="list-style-type: none"> - Re-zoning of community lands at St. Joseph's Road to residential as the Butts has no integral green space, and this is local community ground. - Demolition of two houses at Connolly Street to aid access to this site. This would exacerbate traffic and anti-social problems in the Butts. - The proposed Breagagh Valley Park due to lack of detail in relation to same. The last park in Kilkenny was Scanlon Park which has its gates locked at night. If the park proceeds it will lead to increased criminal activities in the area. <p>Reference is made to traffic surveys provided by the council in 2015 over a 24-hour period highlighting the extent of traffic using Butts Green and St. Josephs Road. It is noted that the council are presently undertaking traffic surveys in the area and the community are unable to make an informed submission without relevant up to date traffic studies. The following issues were also raised in relation to traffic / roads infrastructure:</p> <ul style="list-style-type: none"> - Proposed housing / school developments in the area will lead to additional traffic on the existing road network will increase traffic congestion especially at peak times. - This could have consequences in relation to emergency response times for the Seveso site on the Tullaroan Road should an incident occur there. 	<p>Interim Chief Executives Response:</p> <p>The response is outlined under the following headings:</p> <p><u>Zoning/Housing/Demolition of Houses</u></p> <p>Also see response to submission 16 above.</p> <p>The Butts neighbourhood and adjoining amenity sports grounds will be designated as a "Special Regeneration Area" within the plan. All "Opportunity Sites" will be re-classified as "Sites for Consideration" and a new objective for this "Special Regeneration Area" shall be included in the Masterplan, which will read as follows: "No proposal for development shall be brought forward for statutory planning approval by the Council within the Butts "Special Regeneration Area" as delineated until such time as there is proactive engagement with the residents and stakeholders on the specific development proposal(s)."</p> <p><u>Loss of Amenity / Community lands</u></p> <p>It should be noted that overall the Masterplan provides increased amenities for the community. The proposed residential zoning of lands currently zoned for amenity / open space purposes in the KCCDP behind the houses on Connolly Street are primarily greenfield in nature and not in use as an amenity. This amenity will adjoin the proposed River Breagagh Park which will be a significant amenity for residents in the area. It will also help to ensure that there is connectivity with adjoining neighbourhoods. These amenity lands will now be included in the Butts "Special Regeneration Area".</p> <p><u>Breagagh Valley Park</u></p> <p>It is not anticipated that the park will be used as a formal sporting facility but rather an informal recreational area. Walking / cycling links are proposed and such links will provide a form of surveillance which ensures the area is monitored frequently.</p> <p><u>Segregation</u></p> <p>While it is not clear what is meant by "compulsorily segregated", it should be noted that as no housing is</p>
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		<ul style="list-style-type: none"> - Provision for such an incident needs to be planned for and prioritised by the council especially during peak traffic times. - In the interests of public safety, the completion of the N7 should be a priority, while acknowledging the Waterbarrack has to be protected. - It is submitted that the councils CPO order on grounds off St. Josephs Road is a private lane not a public right of way. <p>A range of questions are outlined in relation to further densification of social housing in the Butts area. These include:</p> <ul style="list-style-type: none"> - Are the joint policing committee on board with the proposed further densification of the Butts? - Is the area being compulsorily segregated? (undue segregation) - Are developers Part V obligations for exclusive Loughmacask developments being planted in the Butts? <p>Some residents in the Butts fear for their lives, with many local authority residents there seeking housing transfers while owners there have no chance of ever selling their homes.</p> <p>Extent of development on Lord Edward Street is unknown with mains sewerage there presently at capacity. Traffic and parking there are long standing issues. Some structural damage has been caused to homes due to the volume of HGV traffic passing. Residents of Pearse Street fear high rise development on Lord Edward Street will impact their privacy and security. It is further re-iterated that access to the Seveso site needs to be improved should an incident occur and that it would be prudent to complete the N7 road prior to further densification of the Butts.</p>	<p>currently proposed, the tenure of any additional housing has not been determined. Housing and tenure will be a matter addressed as part of the regeneration proposals for the Butts Special Regeneration Area.</p> <p><u>Part V Obligations</u></p> <p>Part V obligations for the Loughmacask developments are being provided on site i.e. within the developments.</p> <p><u>Development on Lord Edward Street</u></p> <p>There are no plans developed for the Lord Edward Street site as yet. It will now be referred to as a site which is open for consideration in the Special Regeneration area. No proposals for development shall be brought forward for statutory planning approval by the council within the Butts “Special Regeneration Area” as delineated until such time as there is proactive engagement with the residents and stakeholders on the specific development proposal(s).</p> <p><u>Traffic Congestion/Roads Infrastructure</u></p> <p>See response to submission 6 above.</p> <p>The solution to a large extent depends on the construction of connecting Road R7 as an inner orbital route which will take HGVs and cars from Lord Edward Street. In combination with the promotion of active travel, these measures will contribute towards the long-term alleviation of traffic along Lord Edward Street, The Grange road and the Waterbarracks. Also see response to 6 above.</p> <p>It is also proposed to include an objective for options to connect R6 with the Tullaroan Road, subject to the appropriate traffic management regime.</p> <p>In relation to accessibility for emergency services to the Seveso site, it should be noted the HSA did not raise concerns when consulted. However, the additional routes proposed (as outlined above) along with the active travel measures already outlined in the plan will help to reduce traffic generally and ensure the site can be accessed easily.</p>
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171	Dunningstown Road Upper Group	<p>The group which has over 40 participants, represents residents, business and farming interests from the old weather station up to Hillcrest and beyond.</p> <p>The provision of footpaths, cycle lanes, a local shopping centre, and the new CBS school are welcomed along with the protection of the Loughmacask Turlough and the development of a nature reserve.</p> <p>There is concern that the plan does not address the severe traffic congestion that will arise from the new school, expansion of existing schools and the addition of 700 new houses in the area.</p> <p>It is contended that no consideration is given to the excessive high volume of HGVs that frequent facilities such as Grassland,</p>	<p>Interim Chief Executives Response: It should be noted that within the entire Masterplan area there are over 650 housing units permitted / under construction along with the new school. The enhancement of the Turlough as an amenity is included in one of the developments, Planning ref 10/15 and is currently receiving attention.</p> <p>Also see response to submission 6 above.</p> <p>The development of the R7 road which will link the Tullaroan Road to the Kilmanagh and Freshford Roads as an inner orbital route is priority for the Council and should take significant numbers of HGVs and Cars from Lord Edward Street.</p>

		<p>PRL and Dalton Mills. HGVs access Grasslands through Lord Edward Street in the Butt's area.</p> <p>The plan should be amended to develop the R7 linking the Tullaroan Road to the Kilmanagh and Freshford Roads.</p>	<p>It is also proposed to include an objective for options to connect R6 with the Tullaroan Road, subject to the appropriate traffic management regime.</p> <p>Interim Chief Executives Recommendation: See recommendation on submission 6 above</p>
173	Seniors Council	<p>The submission refers to access and parking at St. Luke's Hospital along with bus services in the area.</p> <p>Concern is raised in relation to the safety of pedestrians accessing St. Luke's Hospital due to the level of cars using the facility and a lack of parking on site.</p> <p>In addition to the extended bus services, shelters and timetables already provided, provision of a bus shelter at the hospital or nearby on the Freshford Road is awaited with hope.</p> <p>The 2 main bus routes in the city (KK1 and KK2) are outlined which are useful for those living on those routes. However, there are no stops within estates or along some other routes to facilitate senior citizens and those with special needs to carry bags / socialise within their communities. A 'Ring a link' service would be helpful for them.</p>	<p>Interim Chief Executives Response: It should be noted St. Luke's Hospital falls outside of the Masterplan area. Access and parking on the site are not addressed in the Masterplan. However, it is anticipated the range of active travel measures and connections provided in the plan will help to reduce car dependency and provide an incentive for visitors and staff to use other forms of transport.</p> <p>Although the Masterplan is limited in its scope, the Kilkenny SUMP (Sustainable Urban Mobility Plan) will take a view that is broader than the Masterplan area. Stakeholders should be able to make submissions to the SUMP process later in the year.</p> <p>Interim Chief Executives Recommendation: No change to Draft Plan.</p>
175	Marcella O'Regan	<p>The submission concerns traffic congestion and it is stated that exiting the Clarnwood Estate onto the Freshford Road is already very difficult for residents and that when future traffic from the CBS school is added it will likely make it even more difficult.</p>	<p>Interim Chief Executives Response: The R6 Road to the new CBS School was granted with due consideration for the potential of impact on traffic and traffic management measures are included in its design.</p> <p>Also see response to submission 6 above</p> <p>Interim Chief Executives Recommendation: See recommendation to submission 6 above</p>

As referred to in the response to some of the submissions outlined above (notably submission numbers 7, 11, 36 and 42), wherein the minutes of the meeting at Dicksboro GAA Club on the 6th of December 2022 were requested below is a summary of the concerns raised at this event:

- Volume of traffic existing is already a major concern especially at peak hours. Add to this traffic from permitted estates or those under constructions and this will be unsustainable and unacceptable.
- The traffic issues / problems in the Loughmacask area should be prioritised to be addressed over a new plan for the area.
- Has park and ride been considered to eliminate traffic volumes in this area?
- What are the constraints with the outer ring road and why is it a long-term plan for the area?
- Why won't the R7 link road or even on arm of this road happen sooner rather than later as a means to help alleviate traffic?
- What funding is in place for the roads proposed to serve this area and what studies have been done on these roads?
- Concerned that too much emphasis is being placed on people not using their cars and walking / cycling will take over, which is not a reality.
- Concerns about outer ring road objective being 'pie in the sky' and never going to happen and what state will this leave people in this area in with daily traffic volumes set to increase with the school and new estates.
- Traffic to new school a major concern in the area.
- Stressed that adequate infrastructure for new housing / development needs to be in place before further development occurs in this area.

It is considered that all these issues have been addressed in the CE's report.

4.0 Next Steps

The Members shall consider the Interim Chief Executive's Report and following this consideration the Members may accept the recommendation or may decide to amend the draft plan otherwise than as recommended in the Interim Chief Executive's Report, or decide not to make or amend the Masterplan.

All alterations to the Draft Masterplan will be screened for Appropriate Assessment and SEA before the revised draft Masterplan is put out on public display.


This screening and if necessary the full NIS and SEA must be carried out before proceeding to the public consultation period and will be carried out as soon as possible after the Council's resolution. The public display of any material alterations will be a minimum of 4 weeks during which submissions with respect to the proposed material alterations will be taken into account before the Masterplan is made.

Following the public consultation period, a further Interim Chief Executive's Report is prepared and the Members must consider the Draft Masterplan, the alterations to the Draft Masterplan, any Environmental Reports and the Interim Chief Executive's Report on any submissions received and decide whether to make the Masterplan with or without the proposed alterations.

5.0 Recommendations of the Acting Interim Chief Executive

It is recommended that the Members accept the respective recommendations by the Interim Chief Executive as set out in the report.

Signed:

A handwritten signature in black ink, appearing to read 'Sean McKeown', written over a horizontal line.

**Sean McKeown,
Interim Chief Executive**