



16th September 2026

An Coimisiún Pleanála

64 Marlborough Street,
Dublin 1,
D01 V902

Re: ACP-324414-26

The Proposed Development of the 'Nore River Facilities Kilkenny' at Johns Street Lower, Collegepark, Kilkenny City, Co. Kilkenny – Applicant Response to Observations Received

To whom it may concern,

Following An Coimisiún Pleanála's invitation to submit a written response (email dated 20th August 2026) in respect of the observations submitted on the above application, Kilkenny County Council wish to note the following by way of written response to each of the observations:

Fáilte Ireland (FI) [Observation dated: 11th August 2026]

Kilkenny County Council acknowledge the above observation and appreciate the support of Fáilte Ireland towards the project recognising the tourism and local economic benefits of same. Kilkenny County Council will ensure that all planning and environmental requirements are met if the scheme is granted permission.

Development Applications Unit (DAU) [Observation dated: 12th August 2026]

Kilkenny County Council note that the observation expresses its overall support for the project and the following items were raised which it was felt warranted a written response:

1. **Geo-physical Survey:** The DAU observation notes that they have not received a report of the geo-physical survey and that a full copy of the report was not included with the current application.

Response: A geo-physical survey was conducted by Archaeological Management Solutions (AMS) on 03rd June 2026 to inform the archaeologists' proposed trench location/extent. The relevant information from this survey was used in compiling a method statement for licencing of archaeological excavations. Extracts from this geo-physical survey appeared within this method statement which was included as part of the application documentation. A full copy of the geo-physical survey report can be made available to the DAU and/or Commission if requested to do so.

2. **Archaeological Desktop Assessment:** The DAU notes that this report dates from April 2024, pre-dating the geo-physical survey, and so does not include or incorporate any relevant findings from that survey.



Response: Having reviewed the contents of the geo-physical survey in consultation with the surveyors, it was felt that the survey findings would not materially affect the findings of the 2024 report and on this basis, the 2024 report was submitted as part of the application.

Notwithstanding the above, Kilkenny County Council can update the report to reflect the geo-physical survey in the event that the Commission issue a request for Further Information as recommended in the DAU observation.

3. **Archaeological Impact Assessment:** The DAU note that they cannot support the deferment of archaeological test trenching to the post consent phase. An up-to-date comprehensive AIA is required incorporating both results of the completed geo-physical survey and also the results of a programme of archaeological test trenching. This report should be submitted prior to any planning decision.

Response: The proposed locations of archaeological test trenching have been identified by AMS within their method statement following analysis of the desktop assessment, site drawings/maps/aerial photos/historic/adjacent surveys and the geo-physical survey report.

The proposed locations are in close proximity to the River Nore SPA/SAC. On that basis, it was Kilkenny County Council's understanding that these works could not be completed without planning consent from the Commission. It is noted that the request for permission to carry out this testing was explicitly included in the application to Commission with reference to it in both the site notice and the cover note that accompanied the application.

Following receipt of the DAU observation, Kilkenny County Council have undertaken an internal review of the proposed trench locations in consultation with Kilkenny County Council's Planning Department. The review found that while the overall project redline boundary encroaches upon the SPA/SAC, the proposed trench locations fall outside of the SPC/SAC and with appropriate measures put in place are unlikely to impact the SPA/SAC.

Therefore, in the event that the Commission issue a request for Further Information as recommended in the DAU observation, Kilkenny County Council will complete a Section 26 Application for an Excavation Licence and AA screening and subject to no adverse findings, will complete the archaeological test trenching as identified in the method statement.

Thereafter, an updated AIA noting the findings of these excavations will be compiled as per the DAU observation recommendations and same furnished to An Coimisiún Pleanála.

The remaining items relating to the AIA are on the assumption the granting of consent, such as the engaging of a suitably qualified archaeologist to oversee site excavation works. However, it should be noted that AMS have already been engaged by Kilkenny County Council to provide this service should it be deemed necessary by the Commission prior to their decision.

4. **Underwater Archaeological Impact Assessment:** The proposed development shall be the subject of an Underwater Archaeological Impact Assessment (UAIA), to be submitted to the



Department for review and approval, prior to the commencement of any riverbed preparation or construction works.

Items a-g accompanying the Underwater Archaeology Recommendations relate to archaeological monitoring of riverine works.

Response: AMS are a fully licenced underwater archaeologist, and have been engaged by Kilkenny County Council to provide an Underwater Archaeological Impact Assessment. This includes all necessary method statements, liaison with NMS, licence applications, dive/wade surveys/desktop analysis and report compilation. At the time of writing, they have prepared a method statement for the (non-invasive) Underwater Investigations and are currently seeking appropriate consents through the National Monuments Service for same. These underwater investigations will be carried out once the dive/wade licence is obtained and the results will be compiled in a UAIA. This can be furnished to the Commission as part of planning compliance if conditioned.

In respect of the monitoring of riverine works at construction phase; the need for this should be determined by the results of the underwater investigations and dealt with in due course.

Uisce Éireann (UE) [Observation dated: 12th August 2026]

Kilkenny County Council acknowledge Uisce Éireann's observation in respect of this application and note that water and wastewater connections are feasible, subject to upgrades outlined within their response as follows:

- Potable water supply – 50m extension required to existing network.
- Wastewater Connection – Circa 175m extension required to existing network.

Kilkenny County Council are also aware that these upgrades are not currently planned by Uisce Éireann as part of its network upgrades and all works carried out following a potential grant of permission shall adhere to the Uisce Éireann requirements.

Third Party Observation: Parking [Via KKCC Planning Portal]

Kilkenny County Council have reviewed the observation received and note the overall support for the project and wish to address the following items raised in the observation:

1. Assessment of impacts: The observation raises concerns about the assessment of the impact of the proposed development from a traffic and transport point of view

Response: A detailed Visitor Management Plan was submitted as part of the application.

The Visitor Management Plan sets out the proposed operational arrangements for the facility and notes that visitor numbers and activity intensity shall be managed through booking, registration, supervision, scheduled access windows, peak-time controls, quiet periods and ecological stop or reduction procedures.



Organised water activities shall normally be limited to 8–20 participants per session; school, youth, community and group visits to 10–30 participants; and training sessions to 4–16 participants unless otherwise approved by the site operator. Larger groups shall be split, staggered or refused.

All organised activities, events, demonstrations, competitions, school visits and large spectator gatherings shall be booked or registered with the site operator.

Any site operator will be subject a license agreement from Kilkenny County Council which will include a commitment to adherence to the Visitor Management Plan.

Based on the this, the numbers using the facility will be limited to an absolute maximum of 30 users at any given time.

In the case of groups up to the maximum size, having discussed with the site operator who will have outlined access arrangements, the use of a bus to drop off and collect may be considered the preferred access arrangement. Buses routinely access County Hall via Maudlin Street and can drop off and collect via the existing circulation routes. A bus layover space is available on the Dublin Road, a short distance from County Hall car park, in the event that the bus is required to stay with the group until collection time.

In the case of individual participants or smaller groups, owing the accessible central location including local bus services stopping on John St, other city centre car parks close by and the expected proportion of tourists staying nearby, the number of individual cars seeking to park at the facility will be small and can be accommodated with the capacity of the existing car park and existing road network.

The above expectations have been factored into the EIAR assessment of the potential effects of the proposed development on traffic under Section 7 – Visual Impacts and Material Assets. The report notes that once operational, the proposed development is expected to generate limited trips; therefore, the existing road and junction network serving the proposed development site is considered capable of accommodating the likely level and type of traffic generated. Given the central location, public transport links, secure bicycle parking and pedestrian access via John Street, the recreational facility will encourage a range of transport modes. Parking will be controlled through the existing paid parking facilities at County Hall, with vehicular access to and from Maudlin Street.

2. **Current Arrangements and Proposals:** The observation notes that the proposed facility relies heavily on existing County Hall infrastructure, yet the operation of that infrastructure is not fully explained within the application.

Response: The existing car park at County Hall is currently available for use by members of the public as well as Kilkenny County Council staff. The current car park contains a total of 132 car parking spaces of which 67 are specifically reserved for staff and/or elected members of Kilkenny County Council.

In addition to this, an overflow car parking area (split into 2) is available to the rear of the dedicated staff car park. The number of spaces in this area are not delineated but is estimated to contain



Comhairle Chontae Chill Chainnigh

Halla an Chontae Sraid Eoin Cill Chainnigh
R95 A39T

Pobail agus Áiteanna Inbhuanaíthe a Chruthú

Kilkenny County Council

County Hall John Street Kilkenny
R95 A39T



Creating Sustainable Communities and Places

approximately 80 spaces (split equally between the two areas). The proposed facility covers the entirety of one of these areas.

Visitors to the proposed development who choose to park in the public car park at County Hall will be subject the normal parking charges for this car park.

The current car park is open 24/7 via the barrier system at the Maudlin street for access/egress. Tickets are obtained on entry and payment made at the pay station prior to exiting. Egress via John Street is only available for staff vehicles, pedestrians and cyclists and this entrance closed via the contract with a private security company who are contracted to monitor and secure the County Hall site outside of normal working hours. These hours are reflected in the signage at the car park entrance.

Subject to planning approval for the proposed development, Kilkenny County Council intends to seek expressions of interest for use of the proposed facility. As part of this process, engagement with potential operators and other user groups will identify their access requirements and any amendments required to current car park operating hours to align with these requirements will be made. This is an operational matter for Kilkenny County Council as owners of the site and any changes to the proposed car park operating hours are not the subject of this application.

The nature of the facility is a recreational sports amenity and, on that basis, the majority of activity will occur outside of normal office hours. The use of the facility during normal office hours will be a matter for agreement with site operators in consultation with Kilkenny County Council. As is the case in many organisations, Kilkenny County Council experiences an increase in the number of staff taking annual leave during the summer months of June, July and August. This in turn sees a reduction in demand for staff parking during these months. It is therefore considered that the proposed development is the ideal complementary use for County Hall and maximises use of the existing car park.

The proposed facility includes storage areas designed to accommodate boats and other equipment required as part of the use of the facility. With this space available, the site operators will store the majority of equipment including boats used on a regular basis within the proposed development and the transport of same to/from the site will be infrequent. The proposed facility includes a turning/set-down area to accommodate the transportation of equipment to/from the facility when required. Site operators using the set-down area will primarily be bringing equipment to/from the site and exiting shortly afterwards rather than remaining on site. In the case where they will remain on site, the site operator will coordinate with Kilkenny County Council in line with the Visitor Management Plan to ensure that any larger vehicles and/or trailers are parked in a considerate manner within the existing car park.

Kilkenny County Council currently operates an agreement with the River Court Hotel which allows them use of an area of hardstanding near their rear entrance as an overflow carpark during the full week. The agreement also allows them to avail of an additional section of the hardstanding carpark over weekends only. This agreement is subject to continuous review and in the event of the proposed development proceeding as planned, this arrangement will be modified to facilitate construction of the proposed development and the operation of the County Hall campus going forward.



The main pedestrian and cyclist access to the development will be from John Street. The existing County Hall access from John Street is regularly utilised by pedestrians and cyclists including those with disabilities wishing to access County Hall, the existing car park and/or as a through route for other nearby recreational amenities such as the Lacken Boardwalk. The “No Entry” signage visible on John Street relates to vehicle access only.

The existing vehicular access to/from John Street is a staff only exit. This facility is subject to infrequent usage.

Based on the current traffic management arrangement in place in County Hall, the access road between John Street and the proposed facility is proposed to be designated as a shared space where pedestrians, cyclists and vehicles share the existing access road. The existing footpaths will be retained as part of this proposal. This distinction includes the existing maintenance and emergency services access road towards the rear of the River Court Hotel. Along this route, additional bike parking will be provided as is noted on the design drawings.

Given the nature of the proposed development and relatively low numbers involved, the use of this route as the main pedestrian/cyclist to the facility is considered wholly appropriate.

Kilkenny County Council have also undertaken a desktop review of other facilities of a similar nature proposed under the Fáilte Ireland Platforms for Growth Programme. While each scheme is site specific, it was found that the proposed approach in relation to parking and access aligns with other proposed schemes in the programme.

Notwithstanding the above, as part of the project, a detailed and comprehensive signage package will be delivered which will include appropriate signage guiding pedestrians and cyclists to/from the facility. This will include a review of the existing signage from the John Street entrance into County Hall.

3. **Sustainable Travel:** The observation highlights that the application places a reliance on sustainable transport objectives, including walking, cycling and public transport. While these objectives are supported in principle, the observation argues that the application relies on encouragement rather than evidence.

Response: Kilkenny County Council as an organisation is committed to more sustainable travel and have recently passed an amendment to the County Development Plan 2021-2027 to incorporate the Sustainable Urban Mobility Plan (SUMP). As part of the SUMP, a wide variety of measures are proposed to encourage and support the use of sustainable transport modes. These measures are designed to help manage future growth of Kilkenny City, promoting positive outcomes for the local community, with a focus on transport and mobility.

The plan specifically identifies those who work in Kilkenny City (including staff in County Hall) as a target group for modal shift.



Comhairle Chontae Chill Chainnigh

Halla an Chontae Sraid Eoin Cill Chainnigh
R95 A39T

Poball agus Áiteanna Inbhuanaithe a Chruthú

Kilkenny County Council

County Hall John Street Kilkenny
R95 A39T



Creating Sustainable Communities and Places

The SUMP also has a specific aim to use existing public and private parking more efficiently and this will be delivered in phases, beginning with manageable changes and moving toward a long-term vision of people-first city centre.

The SUMP is expected to deliver broader, less easily measured benefits, including improved physical health and fitness, enhanced wellbeing, better journey quality, and increased urban liveability. Other unmeasurable benefits may also include stronger community ties, reduced stress levels, and a more vibrant and inclusive public realm.

Kilkenny County Council is also a partner of the Smarter Travel Behaviour Change Programme. As part of this, travel surveys are conducted that allow for the identification of commuter patterns, travel behaviours and barriers to sustainable transport. A variety of initiatives have been put in place for staff in Kilkenny County Council to encourage walking and cycling, such as improved changing facilities, workplace cycles and access to bike maintenance equipment.

For those who are not in a position to walk or cycle, other measures are actively encouraged such as carpooling. Park and stride facilities are also currently in development. Fleet bikes have been introduced to allow staff to travel by bike during their working day, reducing the reliance on cars for short trips. Remote working further reduces the reliance on car travel and is made available where possible in the organisation. The opportunities to commute by public transport have improved greatly over the last number of years and it is expected to see an increase in journeys by public transport as frequency of services and routes increase, further reducing the reliance on private car travel.

Aligning with the objectives of the SUMP and the Smarter Travel Behaviour Change Programme, the use of the existing County Hall Car Park in lieu of the provision of additional dedicated parking for the proposed facility is thus considered the most appropriate approach in relation to parking.

Summary

Kilkenny County Council notes the concerns raised in the observation in relation to the provision of parking and access arrangements as part of the proposed development.

The provision of parking and how visitors will access the facility has been factored into the design development.

New dedicated car parking is not proposed as part of the development with the exception of one universally accessible parking space and a set down/drop off area.

Visitors to the facility will utilise a combination of existing public parking in County Hall and pedestrian/cyclist access from John Street which is centrally located in Kilkenny City.

Based on the nature of the proposed development, it has been designed to integrate into the existing County Hall transport network.



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



The limitations on peak usage imposed by the Visitor Management Plan allow for the facility to operate in tandem with existing uses of County Hall and is considered a good example of complementary use of the car park.

The maximisation of existing car parking is directly aligned with the objectives of the Kilkenny City Sustainable Urban Mobility Plan which has been incorporated into the Kilkenny Development Plan.

Additional signage reinforcing the main pedestrian/cyclist route between John Street and the proposed facility will be installed as part of a detailed and comprehensive signage package.

Kilkenny County Council trust the above responses to the observations received are satisfactory and looking forward to your decision in due course.

Yours sincerely,

Tim Butler

Director of Services, Planning, Town Regeneration, Community & Community Development.