

From: [Kieran Kelly](#)
To: [LAPS](#)
Subject: Re: ACP-324414-26 - The Proposed Development of the "Nore River Facilities Kilkenny" Johns Street Lower, Collegepark, Kilkenny City, Co. Kilkenny
Date: Sunday 30 August 2026 16:28:11

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Kieran Kelly
11 willow Cl, Ardmore, Kilkenny, R95 KHY5

On Wed, 26 Aug 2026 at 14:37, LAPS <laps@pleanala.ie> wrote:

Dear Kieran,

Please see correspondence attached relating to your recent submission on the above application.

Kind regards,

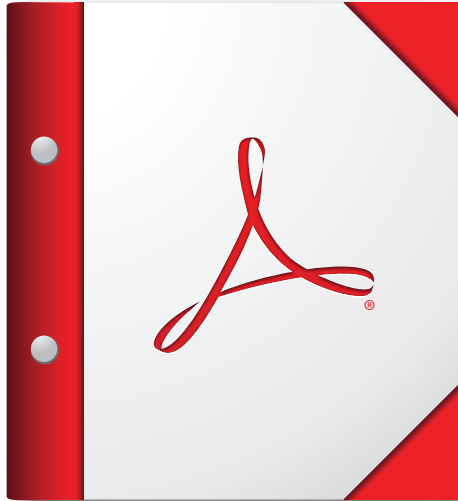
Muirín

Fógra Rúin: Tá an ríomhphost seo agus aon chomhaid atá nasctha leis faoi rún agus dírithe amháin don seolaí. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil le bainisteoir an chórais.

Tabhair faoi deara led thoil: aon tuairimí nochtaithe san ríomhphost seo is iad tuairimí an tseoltóra féin agus níl sé intuigthe gurb iad tuairimí An Coimisiún Pleanála nó go gcloíonn siad le polasaithe ráite An Coimisiún.

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Our Case Number: ACP-324414-26



An
Coimisiún
Pleanála

Kieran Kelly
kieran@theapplemarket.com

Date: 26 August 2026

Re: The Proposed Development of the 'Nore River Facilities Kilkenny'
Johns Street Lower, Collegepark, Kilkenny City, Co. Kilkenny

Dear Sir / Madam,

Kilkenny County Council has forwarded your recent submission in relation to the above-mentioned proposed development and An Coimisiún Pleanála will take it into consideration in its determination of the matter.

Please provide your postal address in order to receive future correspondence on the matter.

Please note that the proposed development shall not be carried out unless the Commission has approved it with or without modifications.

If you have any queries in relation to the matter, please contact the undersigned officer of the Commission at aps@pleanala.ie.

Please quote the above-mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Muirín Gowen
Executive Officer
Direct Line: 01-8049323

AA02

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Láithreán Gréasáin
Ríomhphost

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Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Muirin Gowen

From: Mark McGarry <Mark.McGarry@kilkennycoco.ie>
Sent: Wednesday 26 August 2026 14:14
To: LAPS
Subject: RE: ACP-324414-26 - The Proposed Development of the 'Nore River Facilities Kilkenny' Johns Street Lower, Collegepark, Kilkenny City, Co. Kilkenny

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Hi Muirín,
The contact email for the submission is kieran@theapplemarket.com

Many thanks

Kind Regards,
Mark McGarry
Executive Engineer
Capital Delivery Office & Parks Department
Kilkenny County Council / Comhairle Chontae Chill Chainnigh
Email: mark.mcgarry@kilkennycoco.ie
Office: 056-7794437
Mobile: 087-3310204



Comhairle Chontae Chill Chainnigh
Kilkenny County Council

From: Mark McGarry
Sent: Wednesday 26 August 2026 09:41
To: 'LAPS' <laps@pleanala.ie>
Cc: CDO <CDO@kilkennycoco.ie>; Planning - County Council <planning@kilkennycoco.ie>
Subject: RE: ACP-324414-26 - The Proposed Development of the 'Nore River Facilities Kilkenny' Johns Street Lower, Collegepark, Kilkenny City, Co. Kilkenny

Hi Muirín,
I confirm receipt of the above and we will prepare submissions on the observations received.

In addition to the observations sent to the Commission, Kilkenny County Council received 1 observation to the Kilkenny County Council consult portal which was live for a period of 6 weeks from 30th June 2026 to 12th August 2026.

I attach a copy of the submission and propose that we prepare a submission on the observation in line with those sent to the Commission.

Happy to discuss further if required.

Many thanks

Kind Regards,
Mark McGarry
Executive Engineer

Parking

Author:

Kieran Kelly

Observations

General

Title:

Parking

I wish to express my **strong support** for this proposal. I believe the Nore River Facilities Centre will be a significant asset for Kilkenny, strengthening the city's connection with the River Nore while supporting recreation, tourism, community activities and water sports. The investment in this facility is welcome and I fully support the principle of the development.

While the application focuses on the proposed building, the proposed development is clearly intended to operate as part of the wider County Hall campus rather than as a standalone site. As the application relies on existing County Hall infrastructure—including parking, access and circulation—it should demonstrate how those wider arrangements have been assessed and how they will continue to operate satisfactorily once the development is in use

The application acknowledges that the proposed development will result in the loss of existing County Hall staff parking spaces. It seeks to justify this by stating that the Kilkenny City and County Development Plan encourages walking and cycling and that the majority of activity associated with the facility will occur at weekends when County Hall offices are closed.

While promoting sustainable transport is an important planning objective, the application appears to rely on aspiration rather than evidence. No Traffic Impact Assessment has been prepared, as the report concludes that the surrounding road network is capable of accommodating the expected traffic. However, this conclusion is reached without any assessment of the impact arising from the loss of existing

parking spaces or any detailed analysis of how weekday parking demand will be managed.

The report refers to "**encouraging**" sustainable travel. While this is an important objective, the use of the word *encouraging* is, in my view, insufficient for a development of this scale. It is an aspirational statement rather than an operational strategy. The application does not identify any specific measures that would reduce demand for on-site staff parking or demonstrate how parking capacity will be made available for users of the new facility during normal working hours.

- Does a visitor arriving to drop off a child take a ticket?
- Is the car park free for a short period?
- Is there a grace period of 10 or 15 minutes?
- Is it free for County Hall staff but paid for everyone else?
- Will water activity centre users receive validation?
- If a parent is delayed collecting a child because a session overruns, do they incur parking charges?
- How does someone with a kayak or rowing boat unload, park, and return?
- If the barriers are closed at certain times, how do evening clubs access the site?
- The operation of the existing barrier system during evenings and weekends is not explained.

The application also states that parking will be controlled through the existing parking facilities at County Hall and that the development is expected to generate limited trips due to its central location, public transport links, pedestrian access and secure bicycle parking. Again, these statements are not supported by any assessment of existing parking demand, expected visitor numbers, or how the combined demands of County Hall, the new water activity centre and other users of the area will operate in practice.

Does the existing provision of free staff parking influence parking demand, and

should staff parking demand be managed differently to ensure the proposed development can be satisfactorily accommodated and to support the sustainable-transport strategy relied upon by the applicant?

Access to the shared car park with River court is currently locked on the side of The Council used exclusively by the River Court hotel and only accessed via the hotel and key holders that are willing to open the barrier. As this access been considered in the overall parking requires for the Hotel, the watersports centre, Council staff and their free parking and also visitors to the council car park.

Also, it is important to note how the current car park and main access from Maudlin Street operates.

Note

- Car Park Closed daily at 18.30pm (No access to this centre in the evenings? What are hours of operation?)
- Free 45 minutes for **customers of County hall**. Do people doing drop offs to this centre get same access? How will it be administered in evenings and weekends?
- There is no free access at weekends.

Dúntar an Carrchlós ar 18.30
Car Park closed at 18.30

An Satharn agus an Domhnach - 09.00 go 18.30
Saturday and Sunday - 09.00 to 18.30

Táilli	Tariffs
Luan go hAoine €1.30 san uair an chloig	Monday to Friday €1.30 per hour
An Satharn agus an Domhnach €2 sa lá	Saturday and Sunday €2 per day

[illegible]

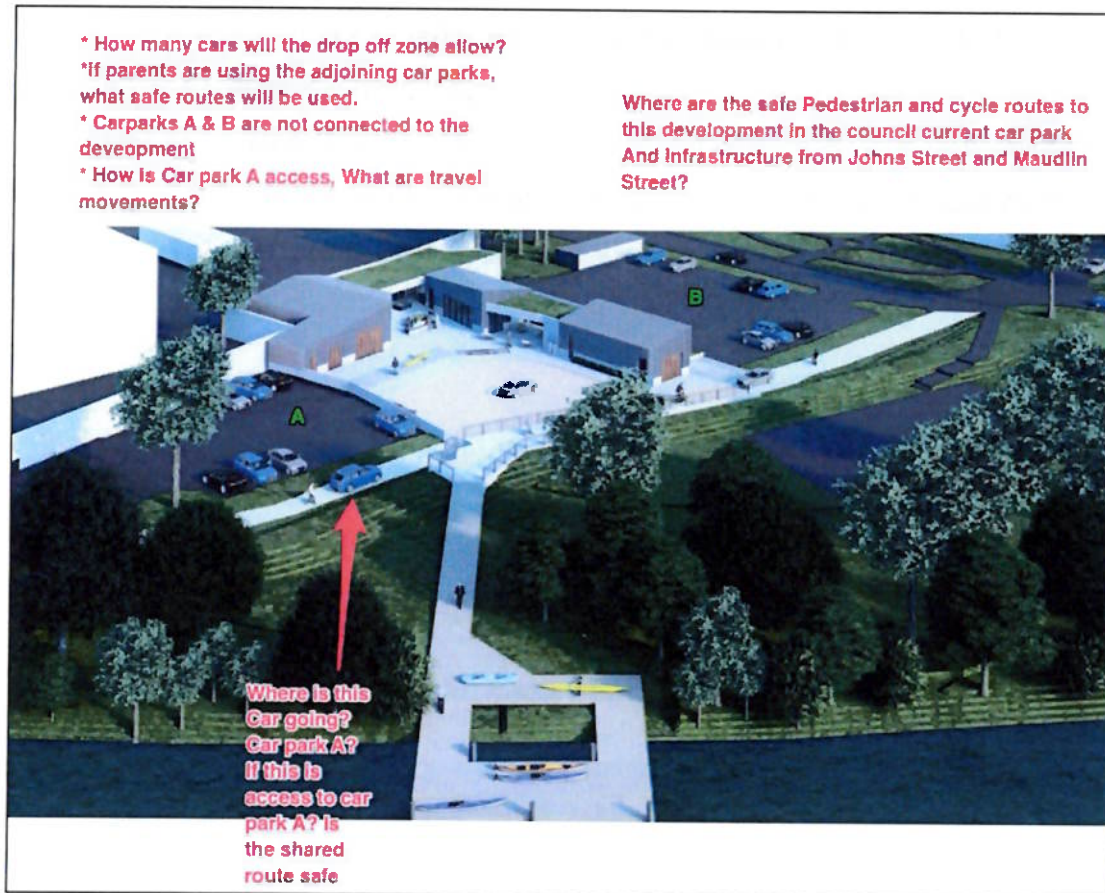




The report further confirms that there will be no public parking provided within the development, apart from a single universally accessible parking space and a turning/set-down area for loading and unloading boats and equipment. Given the nature of the proposed facility, which is intended to serve kayaking, rowing, dragon boating and other water-based activities, it would be reasonable to expect a more detailed assessment of how users transporting boats and equipment will access the site safely and efficiently.

The application also provides limited information regarding pedestrian access to the proposed facility. It is unclear how pedestrians approaching from John Street and Maudlin Street will safely access the building, whether dedicated pedestrian routes are provided through the existing County Hall site, and how pedestrian movements will interact with vehicles using the barrier-controlled entrance and internal road network. Given the emphasis placed on encouraging walking, these routes should be clearly identified and assessed. It also doesn't clearly show how the existing car park integrates with the new development. There is no access from the current car park development. It would be ideal if an opening and a new hatched area were applied to the current car park to provide a safe passage in the existing car park with should be part of the development.

The planning issue is not simply whether sufficient parking exists, but whether the application has demonstrated how the proposed facility will integrate with the existing County Hall transport network upon which it relies.



The proposal describes vehicle access as “set-down only”, but this does not explain the complete journey. A parent may arrive with a child and kayak, unload at the centre, but must then take the vehicle elsewhere. Where do they park, how do they exit through the barrier-controlled site, how do they return to the centre, and how does this operate when several users arrive simultaneously? **A set-down area explains where unloading occurs; it does not constitute a complete transport or parking strategy.**

Also,

The set-down arrangement described in the application relates specifically to **operators/users delivering or collecting boats or equipment**. The application

does not appear to explain how ordinary passenger drop-off and collection will operate, including parents dropping off or collecting children attending activities at the centre.

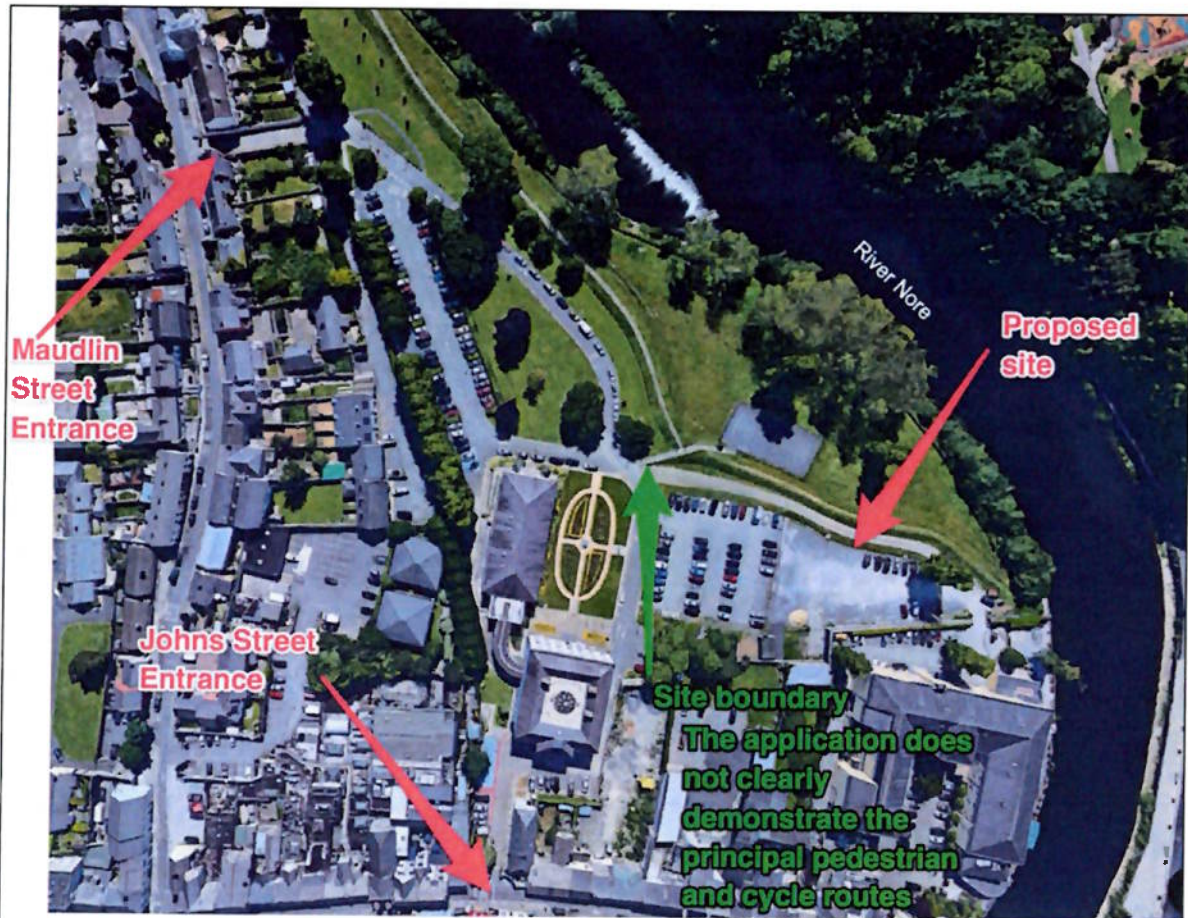
The application does not mention the use of the shared space as an emergency access point for the hotel. It also does not mention the current uses of this road and what is to become a shared space. The Hotel seem to open the barrier as the need arises, is this allowed, what will the future journey on this road be? Will the hotel regularly open it as they currently do?



The application does not mention the use of the shared space as an emergency access point for the hotel. It also does not mention the current uses of this road and what is to become a shared space. The Hotel seem to open the barrier as the need arises, is this allowed, what will the future journey on this road be? Will the hotel regularly open it as they currently do?

4.2.2

The application does not mention the use of the shared space as an emergency access point for the hotel. It also does not mention the current uses of this road and what is to become a shared space. The Hotel seem to open the barrier as the need arises, is this allowed, what will the future journey on this road be? Will the hotel regularly open it as they currently do?



Site boundary
The application does not clearly demonstrate the principal pedestrian and cycle routes connecting John Street, Maudlin Street and the proposed facility.

The assessment should be expanded to demonstrate how the proposed facility integrates with the existing County Hall site and surrounding pedestrian and cycle network.

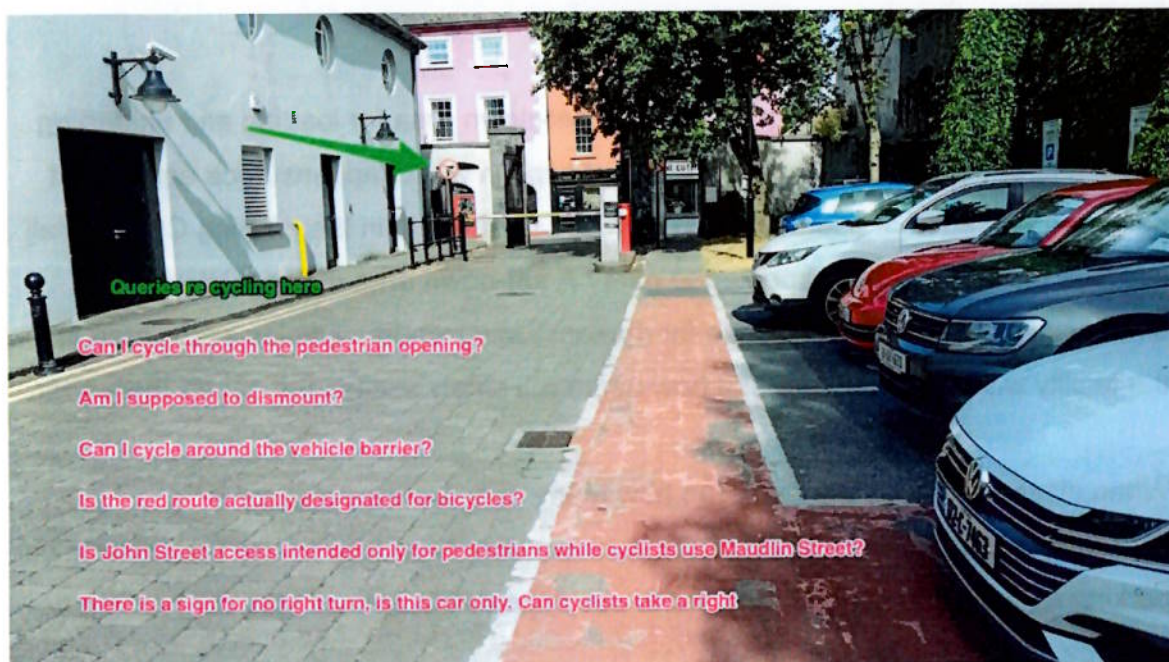
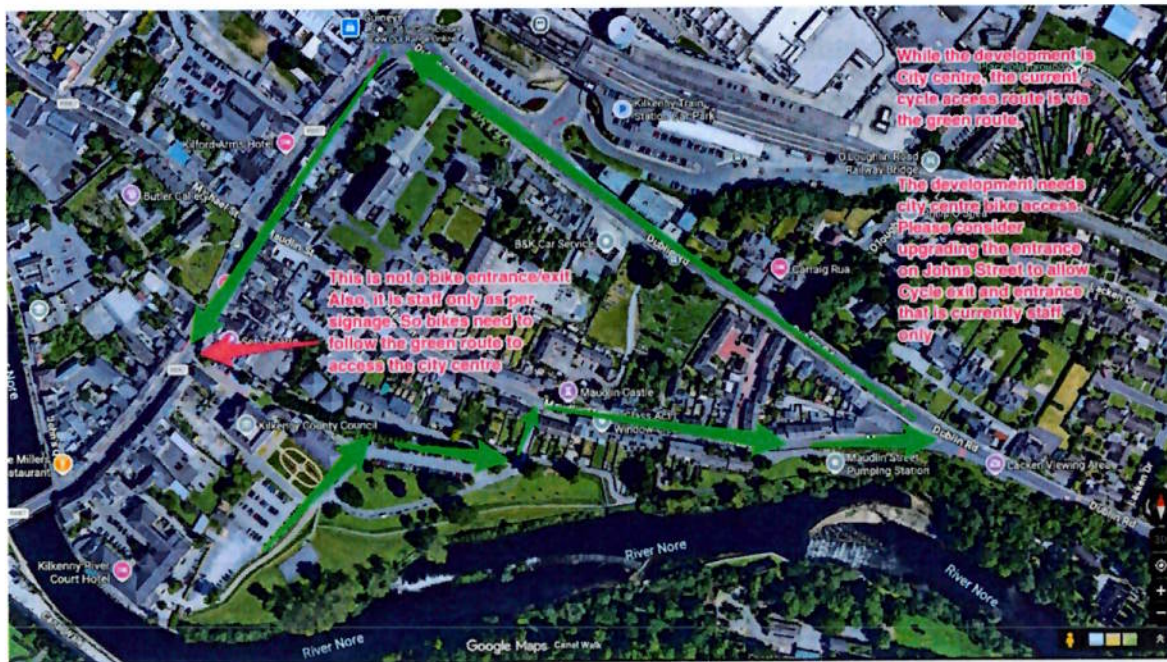
The application also mentioned a shared car park with the Rivercourt Hotel. How does this car park operate? This currently seems to only operate from the Rivercourt hotel. There is a permanently locked gate here from the council side. It is important to understand how this will operate going forward. Will the shared space be used to access this? Will it be used by users of the new facility? Will they access via the Rivercourt hotel?

The proposed water activity centre will attract visitors transporting kayaks, canoes, paddleboards, rowing boats and other equipment. Many users will have little practical alternative but to travel by car. It is unrealistic to expect visitors to unload equipment, drive elsewhere to park and then return on foot. I hope the planners realise this is not feasible and the council car park needs to be assessed with how the staff use it for free, visitors to county hall use it and how visitors to this facility will use it.

The documentation refers to a turning and set-down area for loading and unloading boats and equipment. However, it does not explain what happens once equipment has been unloaded. If users are not permitted to park within the existing County Hall car park, where are they expected to park? A set-down area may assist with unloading, but it is not a substitute for demonstrating where vehicles associated with the facility will ultimately park and how users will safely access the centre thereafter.

When classes/courses are run how many cars are expected for a setdown/pickup. Will they all enter the setdown area? Are they to use the existing car parking reserved for staff? If they are to use the existing council staff car parking how will they access the new facility?

The facility is also likely to generate short-duration vehicle movements, including parents dropping off and collecting children attending organised activities. The application does not explain how these short-stay movements will be safely accommodated within the proposed parking and access arrangements. Where will parents park when collecting or are all cars expected to enter the drop area at the same time?



For all of the above reasons it is important to integrate this new development properly into the city. Comments such as it i use current network at county hall are 100% inadequate.

While I appreciate that staff parking is not a planning entitlement and could reasonably be regarded as a privilege rather than a right, the planning issue is

whether the consequences of removing those spaces have been properly assessed. The Development Plan may encourage more sustainable modes of transport, but this does not remove the need to demonstrate that the development will function satisfactorily in practice. Encouraging staff to walk or cycle does not when they have free parking onsite, in itself, establish that sufficient parking capacity exists or that displacement effects have been adequately considered.

Furthermore, the application places considerable reliance on the assumption that the majority of activity associated with the facility will occur at weekends. While this may be the case during parts of the year, it does not appear to take account of the summer season when water-based activities, training sessions, summer camps and organised events are likely to take place throughout the week. During these periods, demand from County Hall staff and users of the water activity centre may coincide, placing additional pressure on the remaining parking provision. The application does not appear to assess this scenario.

I also request greater clarity regarding the proposed access arrangements. The report states that both entrances are restricted by barriers at certain times of the day and that this arrangement is intended to remain. However, it remains unclear how this barrier-controlled access will operate for members of the public using the new facility, particularly during busy periods, for parents dropping off and collecting children, or for users arriving with boats and other equipment.

Given the reliance placed on walking and cycling as part of the transport strategy, the application should clearly demonstrate the pedestrian and cycle access arrangements from both John Street and Maudlin Street through to the proposed facility. It should identify continuous, safe and legible routes through the County Hall site and explain how pedestrians and cyclists will interact with the existing car park, barriers and internal vehicular circulation. Simply providing bicycle parking at the destination does not, in itself, demonstrate that the development is adequately integrated with the surrounding active-travel network.

This is particularly important given the existing access arrangements. The Maudlin Street entrance is shared with vehicular traffic and does not appear to provide a

clearly segregated route for pedestrians, cyclists or persons with disabilities accessing the proposed facility. On the John Street side, while an existing pedestrian route is available, it does not appear to provide a suitable continuous cycle connection to the proposed facility. Existing signage at John Street also indicates “No Entry”, which further highlights the need for the application to clearly explain how pedestrians and cyclists are intended to access the new centre from this side of the site.

If walking and cycling are being relied upon to reduce the parking and traffic demands associated with the development, these modes should be actively facilitated through the physical design of the site rather than simply encouraged. The application should therefore demonstrate a safe, accessible and coherent route from the surrounding street network all the way to the entrance of the proposed facility and its bicycle parking.

The application also provides very little information regarding the operation of the existing car park itself. It is unclear whether the parking is intended to remain primarily for County Hall staff, whether it will operate as a paid public car park, whether users of the proposed water activity centre will be permitted to use it, or how any charging or access arrangements will apply. These operational details are fundamental to understanding how the proposed facility will function in practice and should be clearly explained as part of the application.

In addition, the application should consider how larger watercraft, particularly dragon boats transported on trailers, will access and manoeuvre within the site. The documentation does not appear to assess these vehicle movements or demonstrate that the internal circulation arrangements are suitable for the range of watercraft the facility is intended to accommodate.



The applicant states in their application.

There are no proposed alterations to the existing site entrances or internal road network.

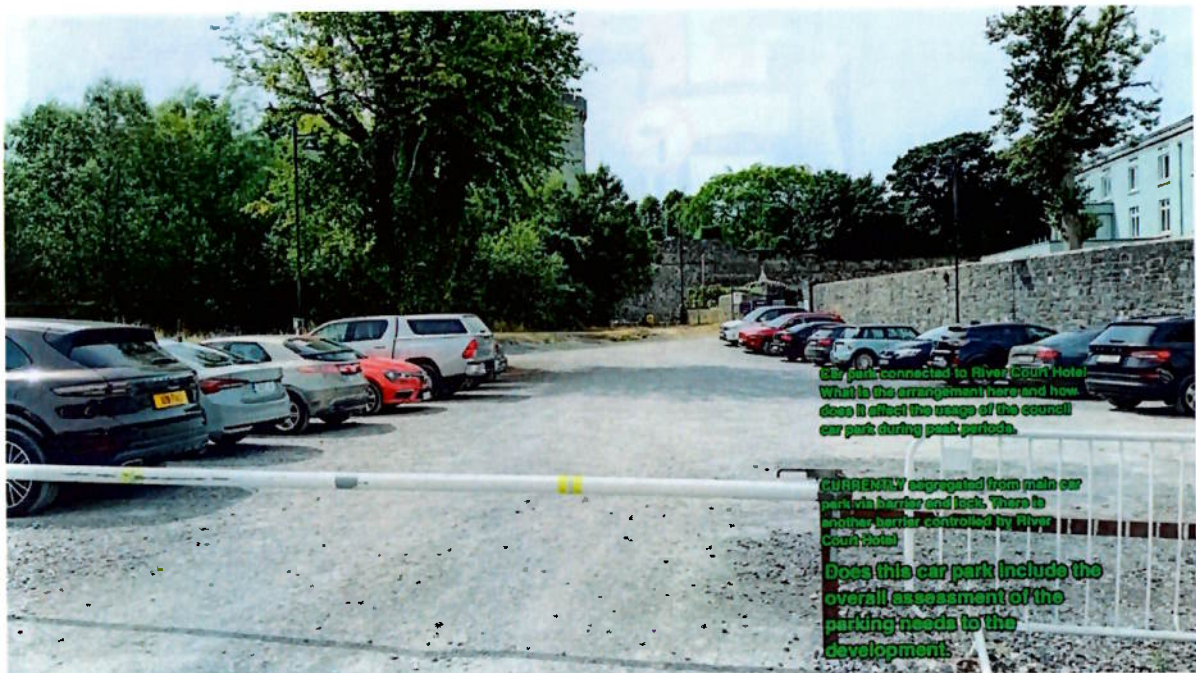
I believe there is a clear need to alter existing site entrances and the internal road network to ensure pedestrians, cyclists and people with disabilities can access the site safely.

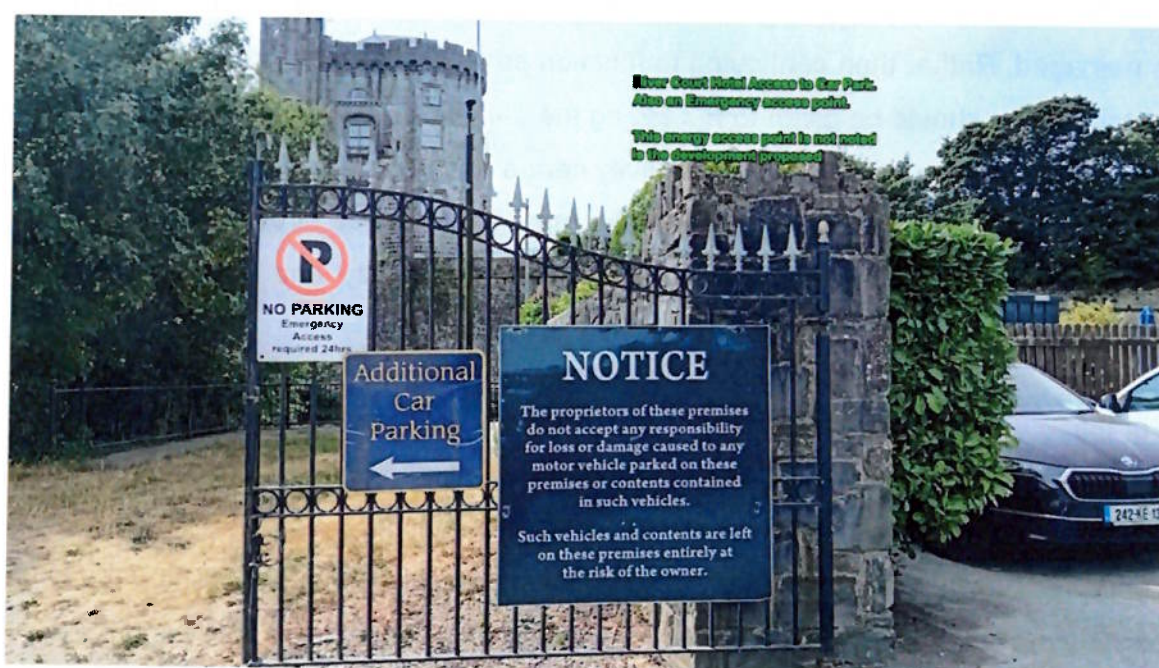
Consideration should be given to upgrading the John Street entrance to provide pedestrian and cycle access to the proposed facility. This would provide a substantially more direct connection between the development and the city centre and avoid cyclists being required to use the considerably longer route via Maudlin Street and Dublin Road.

The current staff only car exit to and from county hall is not in keeping with the idea of promoting cycling to this new development. The council need to move away from this staff only exit and move to a shared access for cycling, pedestrian and disabled access. Doing so would make the site more accessible from the city centre.









Parking and access are not peripheral matters; they are fundamental to the successful operation of the proposed development. Without clarity on how parking will be managed and accessed by different users, it is difficult to properly assess whether the proposed arrangements are adequate.

It is clear that the current car park is forming part of this development but it unclear how both car parks integrate into the plans. My questions with regards to planning is, now that this site is being redeveloped to include a significant public facility, has the applicant demonstrated that retaining the existing parking arrangements is compatible with the operation of that facility and with current transport policy? The application should demonstrate how the continued operation of the existing parking arrangements (free parking) aligns with national and local sustainable transport policy.

The proposed water activity centre is intended to become a destination in its own right. It is therefore appropriate that the parking strategy considers the operation of the County Hall site as a whole, rather than treating the new public facility in isolation.

This development also presents an opportunity to review how the remaining parking is managed. Rather than continuing to function primarily as staff parking, consideration should be given to managing the parking as a shared public resource serving County Hall, the new water activity centre and visitors to the wider John Street area. Such an approach could make more effective use of publicly owned land, improve access to this important new community facility, and better reflect the wider objectives of sustainable transport policy.

For these reasons, I respectfully submit that the application has not adequately demonstrated that the assumptions regarding parking demand, travel behaviour and the loss of existing parking provision are justified. A proposal of this nature should be supported by evidence rather than assumptions, particularly where it relies upon existing public parking infrastructure to accommodate both current users and the additional demand generated by the development.

I respectfully request that An Bord Pleanála consider whether the application should be supported by an integrated parking and access strategy for the County Hall site. Such a strategy should assess the combined parking requirements of County Hall, the proposed water activity centre and all visitors to the site, demonstrate how the development can operate successfully in practice, clearly explain how the existing

car park will operate for all users, and explain how the proposed parking arrangements align with national and local sustainable transport policy.

In my view, parking and access are fundamental to the successful operation of this facility and should therefore be fully resolved at the planning stage rather than left to future operational arrangements.

This proposal presents an opportunity not only to deliver an excellent new water activity centre, but also to rethink how this publicly owned site functions for the benefit of all users. A comprehensive parking and access strategy for the site would help ensure that this investment achieves its full potential.

Overall, I again wish to emphasise my **strong support** for the proposed water activity centre. My observation is intended to ensure that this excellent project is accompanied by a parking and access strategy that is fit for purpose, supports the long-term success of the facility, and delivers the greatest possible benefit from this important public investment.

I hope An Bord Pleanála will support this excellent project while ensuring that the associated parking and access arrangements are sufficiently robust to allow it to operate successfully for many years to come.