



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

12th June 2026

Senior Planner,
Kilkenny County Council,
John Street,
Kilkenny.

**Re: Proposed Variation No. 10 to the Kilkenny City & County Development
Plan 2021**

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 10 (proposed Variation) to the Kilkenny City & County Development Plan 2021 (Development Plan).

As Kilkenny County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is to evaluate and assess statutory plans to ensure consistency with legislative requirements and national and regional planning policy. The Office has undertaken this evaluation and assessment pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546, and this submission sets out the outcome.

In this context, the submission includes recommendations and observations. Recommendations arise where the Office identifies clear inconsistencies with legislative provisions or policy frameworks and are intended to be addressed to ensure compliance. Observations highlight areas where further clarification, justification or refinement would strengthen the plan. The submission may also include advice to support the proper planning and sustainable development of the area.

Following adoption of the Variation, the Office will carry out a further assessment under section 63 of the Act.

1. Overview

The Office acknowledges the work undertaken in preparing the Kilkenny Sustainable Urban Mobility Plan (SUMP) and its proposed incorporation into the Development Plan. The SUMP aims to deliver measures up to 2040 that enhance accessibility in Kilkenny City, with a strong emphasis on sustainable transport networks. The ambition to align land use and transport planning is noted and commended, reflecting a core principle of national and regional policy in supporting sustainable communities and climate objectives.

The Office also welcomes the engagement carried out by the Planning Authority during the preparation of the SUMP. Continued collaboration with prescribed bodies, including the National Transport Authority and Transport Infrastructure Ireland (TII), will be essential to prioritise and implement the SUMP measures, particularly those relating to active travel and public transport infrastructure.

Notwithstanding the above, the Office recommends that priority measures and associated delivery timeframes from the SUMP are clearly integrated and set out in the Development Plan. It would also be beneficial to include a monitoring plan in the SUMP and the Development Plan, to set out how progress will be measured.

The following recommendation and observation set out below are intended to support the Planning Authority in further strengthening the proposed Variation and ensuring its effective implementation:

Subject	Recommendation	Observation
<u>Integration of land use planning and transportation</u>	<u>Recommendation 1</u>	<u>Observation 1</u>

2. Integration of land use planning and transportation

2.1 National road network

The Office welcomes the inclusion of Kilkenny SUMP Objective 13, table 3-6, section 3 Revisiting the baseline and context, which seeks to 'maintain ongoing consultation and engagement with TII and ensure alignment with TII standards by considering the

strategic function of the national roads'. Structured engagement with TII will be critical to maintaining the strategic function and safety of the strategic road network.

2.2 Integration of the Kilkenny SUMP into the Development Plan

The Office welcomes the proposed Variation to incorporate the SUMP into the Development Plan. In this regard, it is noted that priority measures and timeframes for delivery are set out in Section 7 Implementation and Priority Plan of the SUMP. The measures relating to Kilkenny City, including the Loughmacask masterplan lands and the associated timeframes, should also be clearly integrated into the Development Plan, as per Regional Policy Objectives 11(c), 12(f), 151, 152 and 154 of the Regional Spatial and Economic Strategy for the Southern Regional Assembly.

2.3 Implementation and Monitoring of the Kilkenny SUMP

The Office notes the content of section 7 of the SUMP relating to the Implementation and Priority Plan and observes that it does not provide details of how the SUMP is to be monitored. While the Strategic Environmental Assessment (SEA) Screening Report addresses monitoring of the SUMP in general terms, it is considered that the SUMP itself would benefit from the inclusion of a structured monitoring programme. This should set out clear reporting timelines and establish evaluation criteria to assess progress in conjunction with key stakeholders. Details of the monitoring programme should also be incorporated into the Development Plan.

Recommendation 1 - Integration of Land Use and Sustainable Transport

Having regard to the need to the integration of land use and sustainable transportation, and having considered:

- RPO 11(c) of the RSES requiring the preparation of local transport plans for Key Towns;
- RPO 12(f) of the RSES seeking investment in sustainable transport through a Local Transport Plan (LTP), including development of a town bus services in support of the compact 10-Minute City Concept;

- RPOs 151, 152 and 154 of the RSES requiring the integration of transportation and land use planning; and
- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, the Climate Action Plan 2025 and associated actions, including the National Sustainable Mobility Policy (2022), targets to reduce vehicle kilometres travelled per year, and the National Investment Framework for Transport in Ireland (2021),

the Planning Authority is recommended to insert the priority measures and the associated timeframes arising from the Kilkenny Sustainable Urban Mobility Plan into the Kilkenny City & County Development Plan 2021, including those relating to the Loughmackask area.

Observation 1 - Implementation and Monitoring

Having regard to the need to ensure the timely and coordinated implementation of all measures of the Kilkenny Sustainable Urban Mobility Plan (SUMP), the Planning Authority is advised to set out the details of the proposed monitoring programme for the SUMP proposals in order to measure progress. The monitoring programme should be included within the SUMP document and within the Kilkenny City & County Development Plan 2021.

3. Other Matters

In order to provide clarity, the Planning Authority is advised to:

- update the wording of the proposed new Mobility Objective C5A in the proposed Variation to refer to the Kilkenny Sustainable Urban Mobility Plan (SUMP). The reference to a Sustainable Mobility Management Plan should be deleted; and
- improve the quality of the mapping to be inserted throughout Volume 2 of the Development Plan to provide clear and legible mapping.

4. Summary

The Office requests that the Planning Authority addresses the recommendation and observation set out above.


As part of this process, the Chief Executive's report to the elected members, prepared under section 58(11) of the Act should summarise the Office's recommendations and outline how it is proposed to address them.

Following adoption of the Variation, the Planning Authority is required to:

- notify the Office within **one week** of the decision to adopt the Variation;
- inform the Office, as soon as practicable, where it decides not to comply with a recommendation, including the reasons for this decision;
- provide the Office with a copy of the adopted Variation, together with any submissions received from the Minister, the relevant Regional Assembly, and the National Transport Authority during the plan preparation process; and
- publish notice of the Variation within **one week** of adoption, confirming that the Development Plan as varied will be available for inspection (online and at a specified location) no later than **five weeks** after adoption.

The Office looks forward to continued constructive engagement with the Planning Authority. If further clarification or discussion would be helpful, the Office would be pleased to assist and can be contacted at plans@opr.ie.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015