



Planning Ref: 2560700

02 December 2025

Planning Section
Kilkenny County Council

Dear Sir/Madam

Re: 2560700 - for development at this site situated adjacent to the city wall, a National Monument subject to a Preservation Order: TPO 2/96. The development will consist of a building, 3 storeys above existing carparking, providing 40 No. additional hotel bedrooms, storage, staircases, lift, entrance hall together with all ancillary works situated in the existing car park to the rear AT Langton's Hotel, 67 - 72 John Street, Kilkenny.

Comment

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 *inter alia*, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

The Heritage Council has reviewed this planning application for a three-storey over ground floor carpark building. We have put particular emphasis on the drawings as provided, as well as the Archaeological Assessment Report.

In principle, the Heritage Council does not have a particular objection, in general terms, to the backland infill development on an existing surface car park in this location. Our primary concern relates to the design, position and scale of the building in relation to the historic town wall.

The Archaeological Assessment Report has detailed the National Policy on Town Defences (DEHLG 2008); wall defences which are protected under the National Monuments Act 1930 (as amended) and the planning and development acts. In addition, Objective 9C of the adopted Kilkenny County Development Plan 2021-2027 seeks "*to protect archaeological sites and monuments (including their setting), underwater archaeology, and archaeological objects, including those that are listed in the Record of Monuments and Places, and in the Urban Archaeological Survey of County Kilkenny or newly discovered sub-surface and underwater archaeological remains*".

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,
Deirdre McDermott, Dr. Patricia O'Hare, John G.
Pierce, Sheila Pratschke, Prof. Mark Scott,
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Furthermore, the specific development management requirements in the development plan note a requirement “*to ensure that development within the vicinity of a Recorded Monument is sited and designed appropriately so that it does not seriously detract from the setting of the feature or its zone of archaeological potential*”. This reflects the Council’s aspiration to support the National Policy on Town Defences (DEHLG 2008). There is also a specific development management requirement (page 144 of the county development plan) “*to adhere to recommendations in conservation plans when assessing development proposals for these sites*”.

Whilst the Heritage Council acknowledges that no physical alteration to the wall is proposed as part of the development works, we consider that the 4.5 metre buffer between the upstanding remains of the wall and the building line is insufficient in terms of protecting the setting of the wall and its visual amenity value. This is primarily due to the height and scale of the building but also the proximity of the building line to the wall. In addition, it is important to note that development does not stop at the northwest elevation’s building line but there will be attrition to the immediate area between the building line and the wall, i.e. access, landscaping etc. Indeed, it is acknowledged in the Archaeological Assessment Report that the building will have a direct impact on the wall’s setting.

The report emphasises that visually intrusive planting and other development has obscured the town wall at this general location e.g. structures in the car park and residential development towards the corner tower on Maudlin Street. However, this does not mean that further obscurity be pursued.

Previous developments in Kilkenny have not adequately managed how new structures engage with the town wall and its setting. Examples include the Ormonde Hotel and Freren Court on Abbey Street. In these cases, there has been little preservation or enhancement of the amenity associated with Kilkenny’s town defences, which is required by the National Policy on Town Defences¹. This we believe is primarily because of the lack of a satisfactory buffer area between any new development and the town defences”.

In this case the Heritage Council recommend that a greater buffer be established between the northwest elevation and the wall, and that consideration also be given to reducing the height of the building (which is essentially a four-storey building). This needs to be sought via further information in terms of a redesign of the scheme. In addition, more specific landscaping drawings are needed, with particular emphasis to be put along the buffer area between the building line and the wall. This area is part of the

¹ Specifically the Ministerial Consent Policy notes the following:

- To require good quality, context-sensitive design for development proposals affecting the upstanding town defences that would not detract from the character of the town defences or their setting by reason of the location, scale, bulk or detailing;
- To encourage the enhancement of the setting of town defences including the pedestrianisation of town gates where this can be achieved without requiring new roads to be opened through the circuit of the walls. To encourage also the improvement of signage and public utilities structures, etc. where these affect the visual amenity of the defences;

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An Chomhairle Oidhreachta
The Heritage Council

Yours sincerely

Virginia Teehan
Chief Executive Officer