

30 September 2016



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Kilkenny County Council
County Hall
John Street
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Dear Sirs

Re: Proposed Variation No. 1 to the Kilkenny County Development Plan 2014-2020.

We refer to the above and confirm that we, GVA Planning and Regeneration Ltd., have been engaged by the following residents of the South Paddock, Mount Juliet, Thomastown, Co Kilkenny:

House No.1	Colm and Elaine Mooney
House No.3	Thor and Karen O'Brien
House No. 7	Jack and Francis Callan
House No. 8	Rod and Emma Mc Govern
House No 11	Gearoid and Adrienne Doyle
House No. 12	Ashley and Minott Wessinger

to make this submission against the Proposed Variation No. 1 to the Kilkenny County Development Plan 2014 to 2020. This submission is made specifically against Part 1(a) of the Proposed Variation.

Our clients' main concern is that this Proposed Variation facilitates the latest phase in the incremental development of the Mount Juliet Estate in order to provide private housing. Our clients are also concerned that this change is being made without the support of evidence as to why it is required, what the impacts would be, or how it would be beneficial to the tourism function of the Estate.

Variation 1(a) – 'Amend the site specific development standards for Mount Juliet estate.'

This Proposed Variation seeks to increase the number of houses permissible on the Estate under the Kilkenny County Development Plan 2014-2020 (hereafter referred to as 'the CDP') by nearly 80%. Part 1(a) of the Proposed Variation is introduced by Kilkenny County Council with the statement that:

'Following a review by the owners of Mount Juliet estate, potential to provide additional housing development associated with the estate's sporting and recreational functions has been identified.' [emphasis added]

No evidence or rationale to support this increase in, or need for, additional private houses on the Estate has been put forward. A need for such housing was not shown in the adopted CDP or the County Housing Strategy, and nothing to precipitate a change in approach has been set out now.

It should be noted that there is no mechanism available to the Local Authority to effectively control the use of these houses for tourism purposes. Mount Juliet is managed within the CDP primarily as a tourism facility. The proposed housing would not be subject to the same local housing need occupancy conditions that other houses in the rural area would be required to adhere to. Only the first 12 houses build on the estate were ever linked to the hotel on a rental agreement; however the use of these houses is no longer effectively linked to the operation of the Estate as a tourist facility and as

such, the link to its sporting and recreational functions does not exist as set out in the proposed variation. This fundamentally undermines the unique tourist draw that the Estate generates. The Proposed Variation will exacerbate the erosion of the Estate's tourism contribution to Kilkenny and circumnavigates rural housing restrictions.

Moreover, building houses for private use has minimal advantage to tourism as many of the existing houses on the estate are only occupied for several weeks per year rendering the current housing clusters on the estate comparable to ghost estates for the remainder of the year. This does not have a positive impact on tourism. The proposed site for the 16 houses is located within a central area on the estate in an area that has been used to accommodate a tented village during the hugely popular AMEX Golf Championships hosted in Mount Juliet. Losing this open space to housing could jeopardise the estate's capacity to host such internationally renowned events in the future. This same area was also used to accommodate the overflow car park for the Christmas Santa's Kingdom event which brought up to 30,000 visitors to Mount Juliet during the month of December in recent years. Clearly, the loss of this space represents a threat to the estate's tourism potential, contrary to the intentions of the proposed variation.

The adopted CDP¹ states that 9 no. houses may be provided 'subject to the capacity of the estate to absorb development without detracting from the estate's *landscape character and built and natural environment*'. The Proposed Variation seeks to remove this protection. No evidence is provided as to why the protection of the Estate's landscape character and built and natural environment in relation to the development of additional housing - which was deemed essential in the adopted CDP - is no longer required. It would appear as if the proposed variation would have the impact of turning areas of the historical estate into a suburban housing estate.

Compounding this, the impact of the Proposed Variation on the Estate has not been fully considered. Aside from the Strategic Environmental Assessment and Appropriate Assessment Screening, no other assessment of the Proposed Variation has been provided. No Landscape and Visual Impact Assessment has been prepared and the potential impact on the Protected Views set out in Table 7.1 of the CDP has not been assessed. In this regard it should be noted that there would likely be an impact on View No. 2 as indicated in the Mount Juliet Area Action Plan. Notwithstanding this, the proposed housing development would be located in an open and sensitive area within the Estate and would likely have a significant and detrimental impact, particularly between the 10th and 16th fairways.

Conclusion

As the CDP states Mount Juliet Estate is generally recognised as a high quality tourism and sporting resource which is of significant local, national and international importance. It is also a significant built, natural and cultural heritage resource in which many local people have a genuine interest. The housing development that the Proposed Variation facilitates would bear little connection to the unique tourism function of the Estate, and will circumnavigate rural housing policy. The Estate is not a housing development area and has not been zoned as such in the adopted CDP.

Our clients are concerned that the Proposed Variation facilitates the next phase in the incremental development of the Mount Juliet Estate for private market housing. This concern is founded firstly on the fact that no evidence to support the need to change the CDP or the need for housing on the Estate has been set out. Secondly, the impact of additional housing development on the Estate has not been fully assessed. Thirdly, no rationale has been provided as to why the protections afforded to the landscape character and built and natural environment which were deemed essential in the adopted CDP are now being removed.

¹ 'Mount Juliet Site-specific Development Management Standards', No. 12, Table 7.2

As outlined above our clients have raised significant concerns relating to the rationale for the Proposed Variation as well as its potential impact on the Mount Juliet Estate. We trust that these concerns will be addressed and that **Part 1(a)** of Variation No. 1 be omitted.

Regards,



Paul O'Neill
Associate
For and on behalf of **GVA Planning**