

# Kilkenny Draft City & County Development Plan

2021 – 2027

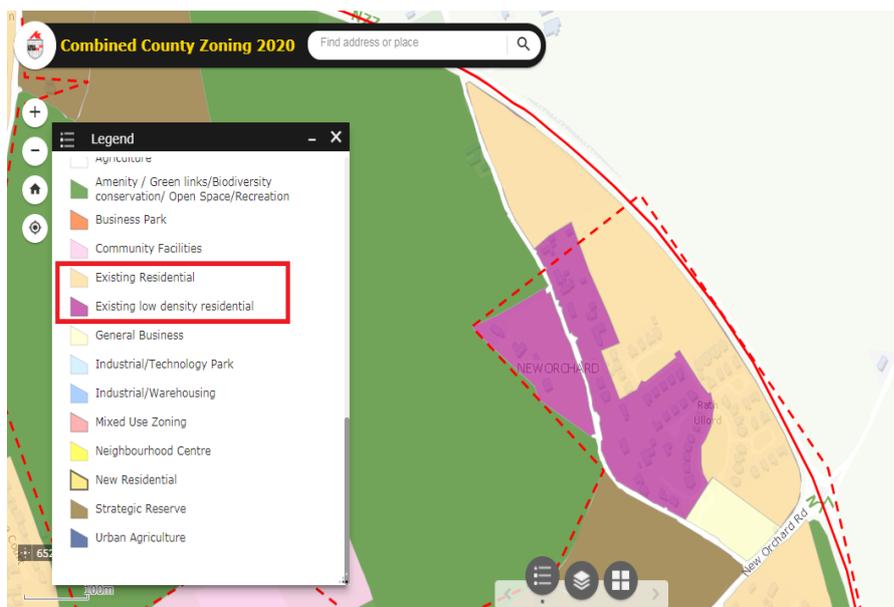
Submission on behalf of: Rath Úllord Residents Association

Date: 10th March 2021

To Whom It May Concern,

With regard to the Kilkenny City and County Draft Development Plan 2021 – 2027, we the Rath Úllord Residents Association hereby wish to tender our concerns and objections regarding a change of zoning contained in the aforementioned draft plan, specifically the intention to change the existing zoned low density residential lands at Rath Úllord. This submission intends to establish that maintaining the existing Low Density Residential zoning at Rath Úllord is justified and the correct policy and zoning decision to be made.

The main cause of our concern and our strong objection is the proposed change from the currently zoned 'Phase 1 – Low Density' in the current Kilkenny City and Environs Development Plan 2014-2020, to the proposed 'Existing Residential', within the Draft Kilkenny City and County Development Plan 2021 – 2027. We instead propose to maintain the existing Low Density Residential zoning and therefore change the zoned 'Existing Residential', to 'Low Density Residential' in the Draft Development Plan in relation to the lands at Rath Úllord as highlighted in the map below.



The main points for consideration of this requested change are as follows:

- Those lands which were previously zoned as 'Existing Residential' are now proposed as

'Existing Low Density Residential'. This zoning objective protects the established zoning objective of less than 10 units per hectare, with regard to the character of the area; and is welcomed.

- Those lands which were previously zoned as 'Phase 1 Low Density Residential' are now proposed as 'Existing Residential'. This zoning change is the primary focus of this submission.
- The proposed zoning change affecting Rath Úllord from 'Phase 1 Low Density Residential' to 'Existing Residential' is strongly objected to, being considered a significant negative change of zoning for these lands.
- The established low density (10 units per ha) criteria for these lands will be removed within the terms of the proposed new zoning objective, with no maximum density established for such lands in the Draft Development Plan.
- This zoning change and split of different zonings, in the middle of an existing estate (parts of which are currently still under construction) will in effect destroy the low density established character of the Rath Úllord estate and indeed undermine the basis of extant planning permissions currently under construction and due for construction.
- We contend that the subdivision of an established and planned low density residential estate (Rath Úllord), which should reasonably be considered in its totality, as a single housing estate, is not within the spirit of the Core Strategy's place making principles, nor indeed in alignment with the following principles of the Draft Development Plan.
  - **Section 13, Strategic Aim:** *'To encourage the creation of living and working environments of the highest quality by ensuring a high quality of design, layout and function for all development under the Planning Acts and Regulations, to conserve and build upon positive elements in the built and natural environment, and to protect amenities'*
  - **Section 13.3** – the Council pledges to: *'ensure that all new developments enrich the quality of its surroundings which means encouraging a distinctive response which complements the setting...Creating a distinctive sense of place, taking into account site history and setting, is important.'*
  - **Section 6.5 (Housing Strategy, Appendix B):** *'Although not precluded but discouraged from central areas, lower density three to four bedroom semidetached and detached family homes are best suited towards the urban periphery...It is important that private households are able to find a range of opportunities to express their lifestyle needs through housing within the City's boundaries and town and villages and not only through one-off rural houses'.*
- It is clear that the future population growth of Kilkenny City is predicated upon the provision of housing units located in City centre infill sites, and those areas currently master planned for significant populations to the west of the City. Rath Úllord is not identified as a significant contributor to future projected housing demands.
- Rath Úllord is located at the outer urban edge of Kilkenny City and presents as an attractive low density residential area adjoining the outer boundary of the City (N77 Ring Road) and alongside extensive rural lands to the North East and the Kilkenny Golf Club amenity to the North West.
  - **Section 6.5 (Housing Strategy)** supports low density residential uses: *'Although not precluded but discouraged from central areas, lower density three to four bedroom*

*semi-detached and detached family homes are best suited towards the urban periphery...It is important that private households are able to find a range of opportunities to express their lifestyle needs through housing within the City's boundaries and town and villages and not only through one-off rural houses'.*

- A number of planning permissions exist which seek the consolidated development of a predominately low density landholding. A change to permissible densities via the new proposed land-use zoning objective will undermine this overall plan for the site through subsequent applications for high density development.
- The current development is not suitable for higher residential density given the relative distance to the City Centre and lack of significant public transport investment.:
  - There is no frequent public transport directly from Rath Úllórd to the City Centre which would be required to support a higher population density.
  - Rath Úllórd remains outside the '**10 minute**' walkable City and is thus not suitable for high density of development.
- National Guidance remains that residential development should be planned and provided in close proximity to the main employment generators where possible with some low-density residential land required to meet latent demand for larger development sites within the City.

As individual residents, we all invested heavily in our properties for the simple reason that the estate was a designated low-density housing development, and we are very concerned that the proposed Draft Plan will now designate the land-use within the estate for a potential higher-density housing/residential scheme. We feel that the proposed re-zoning is not in keeping with Section 6.5 of the Draft Development Plan 2021-2017, in that to remove it would not allow for the provision for private households with '*the range of opportunities to express their lifestyle needs through housing within the City's boundaries*', thus contravening what the Draft Plan is trying to achieve.

In addition, there are no major employment sources at this side of the City and with the absence of public transport, this will result in a substantial increase in traffic volumes using the existing roadways and Ring-road (N77) to access other areas of the City to get to work, school, local amenities, etc.

We are not against further development of the area at all, and we are cognisant of the current housing crisis, however history teaches us that developments must be of a high quality, in keeping with existing areas and with building strong sustainable communities, and Kilkenny is currently able to meet its housing demands with planned developments in the Abbey Quarter, Loughmakask, etc. without having to zone for potential high-density residential developments at Rath Úllórd.

We hope you consider our concerns and recommendations, and we are available to discuss our concerns with you at your convenience.

Kind regards,

Rath Úllórd Residents Association