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Chapter 1 – Introduction		
Key Issues	Response	Recommendations
<p>Monitoring [OPR] -ensure that any monitoring is strategic in nature consistent with Part 10 of the Development Plans Guidelines for Planning Authorities</p> <p>Consultation -questions the effectiveness of consultation carried out</p>	<p>The council is statutorily obliged to monitor and review all policies and objectives within the plan. The council will undertake a 2-year review of the CDP in accordance with s15(2) of the Planning & Development Act. This 2-year review will be forwarded to the Office of the Planning Regulator in order for it to monitor and ensure full compliance with the Core Strategy growth and housing requirement figures. It is considered appropriate to include additional objectives regarding same.</p> <p>Public Consultation is carried out in line with legislative requirements. During the covid-19 pandemic innovative ways were introduced in order to engage with the public including social media adverts/videos and webinars. The webinar held on the 13th of Jan 2022 was viewed by more than 150 people. Extensive consultation took place during both the initial Issues Paper and the Draft Plan stage. Copies of the Draft plan were on display in all public libraries and Municipal District Offices.</p> <p>The Council for the first time used the CiviQ Online Portal, which enabled the public and all stakeholders to easily access the draft Plan and to view all observations and submissions. This resulted in the receipt of 1,988 submission which is a record for Kerry.</p>	<p>Insert New Objectives re monitoring/reviewing. <i>To prepare a preliminary monitoring evaluation report on the likely significant environmental effects of implementing the within two years of the making of the Plan (as per section 15) of the Environmental Report.</i></p> <p><i>Statutory 2 Year Review - The Plan will be reviewed after 2 years, and a progress report will be prepared by the Chief Executive on the achievements in securing the objectives of the Plan at that time.</i></p>
<p>Sustainable Goals -requests amendments to No.4 & No.9</p>	<p>Compliance with the UN Sustainable Development Goals is a main tenet of this Development Plan. These thematic goals have been deeply embedded within the Policies and Objectives of the Plan and consideration of same forms part of the plans reporting and monitoring requirements. These Goals underpin the Vision for the county which is to provide for the development of County Kerry as an attractive, competitive and sustainable place to live, visit and do business, and where the quality of employment and educational opportunities, natural and built environment, cultural experiences and the strength and viability of its rural and urban communities are to the highest standards.</p> <p>Goal 9 seeks to protect the natural and built environment, it is noted that “natural” implies biodiversity, however in the interest of clarity it is reasonable to include the words “including biodiversity”.</p>	<p>Amend Goal 4 - Enhance sustainable Physical and Digital connectivity internally, across the broader region and internationally.</p> <p>Amend Goal 9 - Protect and enhance the Natural and Built Environment including biodiversity.</p>

Chapter 2 – Climate Change & Achieving a Sustainable Future		
Key Issues	Response	Recommendations
<p>Climate Action [OPR] -advise that the draft Plan should include an objective to consider a variation of the development plan within a reasonable period of time, or to include such other mechanism, as may be appropriate, to ensure the development plan will be consistent with the approach to climate action recommended in the revised Development Plans, Guidelines for Planning Authorities – Draft for Consultation (August 2021)</p>	<p>The Draft Plan acknowledges that the issue of climate change is one which affects all of us and which will over the coming years have an increasing impact on all of our daily lives. In order to foresee and plan for challenges ahead and to incorporate the thinking, practices and the solutions around climate change into our everyday work, Kerry County Council has established a climate action team to guide and to lead the work that is required. This work will require us to change our thinking about how we plan our works, it will require us to incorporate actions around climate change at the very earliest design stages of all of our projects, it will require a behavioural change from ourselves and from the communities whom we serve, and it will also require us to show extensive leadership and guidance in dealing with climate change to those same communities. However, it is considered prudent to include an additional objective to consider a variation of the Plan to ensure the Plan will be consistent with the approach to climate action recommended in the finalised Ministerial guidelines: Development Plans, Guidelines for Planning Authorities.</p>	<p>Amend Objective KCDP 2-2: Facilitate and support national climate change objectives contained in the Climate Action Plan 2019 and the actions contained in the KCC Climate Change Adaptation Strategy 2019-2024 and successor strategies, and to consider a variation of this development plan if necessary to align with the approach recommended in the Ministerial guidelines: <i>Development Plans, Guidelines for Planning Authorities</i>.</p>
<p>SRA requests Objective in Support of Co-Ordination with the Climate Action Regional Offices</p>	<p>Chapter 2 of the Draft Plan sets out the legislative framework for the transition to a low carbon economy including reference to international, national and regional policies & strategies. The Draft Plan also makes specific reference to practical implementation measures in order to achieve this goal including working with stakeholders across a broad range of sectors. It should be noted that reference is made to Dingle as a pilot decarbonising zone in Section 2.6.2.1. Whilst this is the case it is acknowledged that specific reference to the Atlantic Seaboard South CARO should be made within the text and a specific objective is required to reaffirm KCCs continued support for the Climate Action Regional Offices (CAROs) in order to assist actions of decarbonisation through regional collaborations. In addition, it is recommended</p>	<p>Insert New Objective: To collaborate with the Atlantic Seaboard South Climate Action Regional Office (CARO) to assist implementation of Development Plan policies and objectives for climate action mitigation and adaptation; and to achieve the climate action policies and objectives set out in the Southern Region Spatial and Economic Strategy.</p> <p>Include additional wording in Section 2.6.1: Kerry County Council recognises the role of the Atlantic Seaboard South CARO, who support and coordinate climate action undertaken by Local Authorities in the south-west. The Local Authority will continue to co-ordinate with the CARO in order to deliver climate action at a local level and implementation of Development Plan policies and objectives for climate action mitigation and adaptation.</p>
<p>Climate Policy</p>	<p>This plan augments the “integration” of climate action into planning policy directly through policies and objectives that support climate action but also indirectly through spatial and physical planning. The latter needs to dictate a vision for the future development of the County that for example supports local transport initiatives; provision of green and blue infrastructure;</p>	<p>No proposed amendments.</p>

<p>Reduction in Carbon Emissions across all sectors</p> <p>Nature based solutions required to tackle climate action</p>	<p>appropriate zoning/development of lands in urban cores and addressing of flooding issue</p> <p>The transition to a low carbon energy future will require a wide range of responses across the public and private sectors and in communities to change how we use energy at home, in our work and how we travel. Fundamental to this is a change to more sustainable settlement patterns. The focus on compact growth of our towns and villages, placemaking, sustainable transport, and focus on the location of development in sustainable locations will bring fundamental benefits to climate change mitigation. This plan aims to support the increased use of sustainable modes of transport; the integration of spatial planning with transport planning; enhanced county and regional accessibility; the transition to a low carbon energy efficient transport system; and the development of a safer, more efficient, effective, and connected transport system within County Kerry. Cutting GHG emissions in the carbon intense transport sector is a particular challenge for Ireland and indeed Kerry. This is due to our traditional dispersed settlement pattern and low population density.</p> <p>The plan seeks to promote nature-based systems for water management services. It is an objective of the plan KCDP 2-10 to support nature-based solutions to climate change challenges and also initiatives aimed at increasing soil carbon retention, sequestration, and storage, objective KCDP 11-22 also seeks to support projects such as nature based sustainable urban drainage systems.</p>	<p>No proposed amendments.</p> <p>It is considered acceptable, however, to include an additional objective seeking to: Actively implement measures detailed in the 'Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Water Sensitive Urban Design Best Practice Interim Guidance Document'</p>
<p>SRA seeks to develop a Regional Decarbonisation Plan to provide a framework for action on decarbonisation across all sectors</p>	<p>Kerry County Council supports the preparation of such a plan and the decarbonisation of the region. The Council will continue to work with the Dingle Creativity and Innovation Hub to pilot Dingle as a decarbonising zone for the county.</p>	<p>No proposed amendments.</p>
<p>Changes to Objectives in Chapter 2</p>	<p>Some of the submissions received set out suggested minor amendments to Objectives KCDP 2-3, 2-4, 2-5, 2-7 and 2-10 which are considered to be appropriate changes. Full details of these changes are set out in the main report. It is also considered appropriate to include a new objective as set out in the recommendations.</p>	<p>Add new objective KCDP 2- Promote regenerative farming and local food production in communities all over the county, using the 'transition farming' and 'climate proofing' approach, with local biodiversity and integrated nature-based solutions and biodiversity being given priority.</p>
<p>Biodiversity & Peatlands</p>	<p>Chapter 2 and Chapter 11 provide details on the CDP policy in relation to wetlands (includes peatlands) and carbon sequestration while Chapter 10 provides objectives to support community-led projects including those with a focus on the environment and/or outdoor recreation. The CDP also</p>	<p>No proposed amendments.</p>

<p>-highlights importance of carbon sequestration, protection of bogs & peatlands</p> <p>-highlights importance of protection of landscape and seeks to enhance biodiversity</p>	<p>supports the funding of projects that seek to protect the environment; enhance biodiversity and/or respond to climate change and seeks to pursue any available funding in collaboration with stakeholders where possible.</p> <p>Chapter 2 and Chapter 11 provide details on the CDP policy in relation to wetlands (includes peatlands) and carbon sequestration while Chapter 10 provides objectives to support community-led projects including those with a focus on the environment and/or outdoor recreation. The CDP supports the protection of landscapes and biodiversity, specifically outlined in Chapter 11. However, protection of the environment has underpinned the entire plan making process and the CDP supports the sustainable development of all infrastructure projects, at appropriate locations, further to proper planning and sustainable development and in compliance with applicable environmental legislation, notably the Habitats, EIA and Water Framework Directives.</p>	<p>No proposed amendments.</p>
<p>Sustainable Transport</p> <p>- Modal shift & sufficient transport facilities</p> <p>-requests provision of EV charging points in all new developments & public car parks.</p>	<p>Climate change policy ultimately supports population growth in a compact, connected, and sustainable way which is less transport intensive through better planning, remote and home-working modal shift to public transport and walking/cycling. It is imperative that there is a shift away from car-based travel. The Council will continue to develop safe walking & cycling routes throughout the county and especially within an urban context to enable people of all abilities to walk or cycle to school, work & leisure.</p> <p>The CDP contains policy and objectives (see CDP 12-11) that support the sustainable provision of charging infrastructure for electric vehicles.</p>	<p>The CDP contains policy and objectives (see CDP 12-11) that support the sustainable provision of charging infrastructure for electric vehicles across the entire county, including the Dingle Peninsula. The details of the infrastructure and specific location etc is outside the scope of the CDP but rather will be finalised at design stage for any individual project/development site.</p> <p>The rollout of Electric Vehicle (EV) infrastructure will be outlined in the Electric Vehicle Charging Infrastructure Strategy 2022-2025.</p>
<p>Land Management & Flooding</p> <p>- strong policy required relating to ICZM, coastal areas, and flooding areas</p>	<p>Policies and objectives in relation to Coastal Zone Management and flooding are set out in Chapter 11 – Environment and the Strategic flood risk Assessment report. These seek to protect habitats, enhance biodiversity and to ensure that vulnerable developments are not permitted in areas identified at risk of flooding.</p>	<p>A number of specific objectives regarding flooding mitigation measures are proposed -See Main Report for full details.</p>

Chapter 3 – Core & Settlement Strategy		
Key Issues	Response	Recommendations
<p>Settlement Hierarchy & Distribution of Growth [OPR]</p> <p>(i) reposition Milltown within the settlement hierarchy as a District Town, and reduce its housing supply target;</p> <p>(ii) reduce the population/housing allocation to Barraduff, Farranfore and Fenit</p>	<p>The plan recognises that Milltown is a rapidly changing and evolving town. Milltown has expanded due to its central geographical location in proximity to Tralee, Killarney and Killorglin. Milltown will be repositioned in the settlement hierarchy as a District Town. The position of Milltown in the settlement hierarchy and its appropriateness or not to be redesignated as a Regional town having regard to existing and planned investment including the Milltown by-pass and the preparation of a Masterplan through the Town Centre First Policy, will be examined and reassessed as part of the two year review process of the CDP.</p> <p>Barraduff was not included as a settlement by the CSO in Census 2016. Its 2016 and 2022 populations are therefore estimated based on the number of houses in the settlement in each year. Between 2016 and 2022 approximately 50 new dwellings have been constructed in the village which has resulted in a noteworthy increase in its 2022 estimated population. The population growth allocated to Barraduff over the lifetime of the plan based on its 2022 estimated population is comparable to other District towns of similar size and having regards to the proximity of the settlement to Killarney, associated housing pressures in Killarney including significant affordability issues, this population allocation is considered reasonable.</p> <p>Farranfore is strategically located at the junction of the N22, N23 and R561 roads, midway between Tralee and Killarney, and southwest of Castleisland. It is a significant transport hub with a train station within the village and Kerry Airport within walking distance to its east. The vision for Farranfore is to ensure that it fulfils its role as a transport and logistics hub located in the Tralee-Killarney Corridor. However, having regard to the OPR's submission and having regard to Farranfore's close proximity to the Two Key towns of Tralee and Killarney it is considered reasonable to reduce marginally the population allocation to Farranfore and to redistribute this quantum to the two Key towns.</p> <p>The vision for Fenit is to ensure that it that it develops sustainably as a compact attractive location for residents and tourists alike, while promoting and preserving its character as a seaside village and working port.</p>	<p>Reposition Milltown in the settlement hierarchy as a District Town and make specific reference in the Core Strategy table to a review of Milltown's position in the settlement hierarchy as part of the two year review process.</p> <p>No proposed amendment to Barraduff.</p> <p>Reduce marginally the population allocation to Farranfore and to redistribute this quantum to the two Key towns.</p> <p>Reduce marginally the population allocation to Fenit and to redistribute this quantum to Tralee.</p>

<p>(iii) ensure that any reallocated growth is transferred to the Key Towns of Tralee and Killarney.</p>	<p>Significant public investment is underway or imminent for Fenit village including;</p> <ul style="list-style-type: none"> • Tralee - Fenit greenway. • Beach facilities. (Fáilte Ireland) • New wastewater treatment plant • Realignment of the access road through the village to the harbour area. <p>In order to ensure that this investment and secondary investment in residential development and allied services / facilities, occurs in a plan led and co-ordinated manner particularly on public lands, a Master plan has been published and is, at present, on public display.</p> <p>There also exists at present, significant pressure for one off housing in the environs of Tralee Town. Outside of Tralee town itself, Ardfert remains the only settlement with wastewater treatment capacity to cater for multiunit development in the Tralee Municipal District and has, recently, catered for a significant amount of social housing. Having regard to:</p> <ul style="list-style-type: none"> • The quantum of public lands, • The pressure for one off housing in the MD and the potential of Fenit to offer a viable settlement orientated alternative, • The Masterplan which has been prepared to co-ordinate the development of the central core of the village and allied investment in community infrastructure and facilities, • The commitment from Irish Water in relation to a new wastewater treatment plant during the lifetime of this CDP, and, • Following IW's investment Fenit's position as the second of only two settlements in the Tralee MD with the capability to cater for multiunit developments, <p>it is essential that a reasonable population target be allocated to Fenit.</p> <p>However, having regard to the OPR's submission and Fenit's close proximity to Tralee it is recommended that this allocation be reduced to ensure that population growth takes place in tandem with the provision of services and facilities across the lifetime of this CDP and the next.</p> <p>Noted.</p>	<p>The reallocated growth has been set out in the revised Core Strategy table.</p>
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<p>Core Strategy Table & Map [OPR]</p> <p>- required to amend the 'Core Strategy table' to include more details on land zoned, proposed densities and potential housing yield.</p> <p>- amend Core Strategy Map 3.1 to ensure consistency with the requirements under Section 10(2B) and 10(2A)(f) of the Act, and the settlement hierarchy established in the RSES.</p>	<p>The draft Plan provides strengthened policy support for sustainable higher densities, facilitates compact growth targets aligned with the National Policy Objectives of the NPF, the renewal of vacant brownfield sites and regeneration of opportunity sites amongst other initiatives.</p> <p>The Draft Plan now includes a Settlement Capacity Audit (SCA) for Tralee, Killarney and Listowel which assesses banks of land lands zoned for Residential Development and the potential unit yield taking into consideration Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages)(2009) but also individual site characteristics including spatial layout, topography, necessary spatially intensive infrastructure and archaeology / environmental challenges. The SCA indicates that the quantum of lands zoned R1 in Tralee, Killarney & Listowel are adequate, and that over capacity of residentially zoned land does not exist.</p> <p>The Council intend to include a similar evidence-based approach to contribute to compact growth on infill and brownfield lands for the remainder of the county's settlements in the review of the MD local area plans commencing Q4 2022.</p> <p>The recent suite of Local Area Plans and the current County and Town (as varied) Development Plans afforded KCC opportunities to address legacy and residual issues, to promote a more sustainable trajectory, and to designate residential lands accordingly. The current suite of LAP's therefore continues to remain consistent with this updated Core Strategy. (See section 3.13 of the draft plan.)</p> <p>The draft Plan provides strengthened policy support for sustainable higher densities, facilitates compact growth targets aligned with the National Policy Objectives of the NPF, the renewal of vacant brownfield sites and regeneration of opportunity sites amongst other initiatives. Section 4.3.8 of draft plan seeks to ensure that all developments are carried out in a sustainable manner and comply with the 'Sustainable Residential Development in Urban Areas Guidelines 2009' and the 'Urban Development and Building Height Guidelines 2018'. Section 6.2.3 and in particular Objectives 6-15 to 6-19 seek to ensure the provision of a mix of unit types in proximity to existing and proposed transport and service infrastructure, in order to meet and adapt to the changing demographic trends and household profiles in a neighbourhood. Higher densities and therefore higher housing</p>	<p>It is considered prudent to include a revised Core strategy table indicating the existing and proposed residential zoned land for the Key, Regional and District towns.</p> <p><u>Core Strategy Map</u></p> <p>It is considered acceptable to amend the Core strategy map (Map 3.1) to ensure consistency with the necessary requirements under Section 10(2b) & 10(2A)(f) of the Act, and to include full details of the settlement hierarchy, rural area types, and regional routes. It is also intended to indicate the Gaeltacht areas on this map.</p>
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	<p>yield will be considered on a case-by-case basis depending on amongst other issues – the location of the site, the design and quality of the scheme - how it complies with certain performance criteria and the quality of life proposed for incoming residents in addition to existing or proposed services in the area. The Town Plans for Tralee, Killarney and Listowel do not limit the consideration of higher densities to certain areas such as opportunity sites. Therefore, it is not considered necessary to specify locations outside of the town centre where higher densities may be suitable as doing so may exclude some suitable areas.</p>	
<p>Development Approach and Local Area Plans [OPR]</p> <p>(i) Key Towns - incorporate in the proposed draft zoning map for the towns of Tralee and Killarney additional lands that are zoned in LAPs in the environs of the towns, amended as necessary to ensure consistency with the Core Strategy targets;</p> <p>(ii) Regional Towns - prepare maps with supporting policy objectives, identifying strategic objectives for each Regional Town, including settlement boundary, compact growth area (CSO boundary if relevant), key sustainable mobility priorities, core retail area , settlement consolidation sites, strategic employment sites, constraints; and</p>	<p>Key towns; The Review of the current County Development Plan 2015-2021 and the preparation of this draft CDP is the first consolidated County Development Plan for the entire County of Kerry, (including the former Town Council areas of Tralee, Killarney, and Listowel). Therefore, lands located in the environs of Tralee, Killarney and Listowel are zoned within the context of the Municipal District LAP and cannot be considered within the context of the Draft County Plan. It must be noted that there is no R1 Proposed Residential zoned land located in the environs of the towns. It is however considered acceptable in the interest of clarity and consistency to overlay those zoned lands in the environs of the towns into the town plans. It should be noted that this approach was followed as per Dept. submissions on the preparation of the Tralee & Killarney MD Local Area Plans.</p> <p>Regional towns; Listowel is classified as a regional town in the settlement hierarchy. As a former Town Council, the review of the Town Plan was also included within the draft plan and the draft plan now includes all supporting policy objectives, strategic objectives, zoning etc. The County Development Plan forms only one part of the hierarchy of land use plans. A planned programme to prepare Local Area Plans (LAPs) in respect of Municipal Districts and other defined geographical areas commenced in 2018 and will continue following the completion of the County Development Plan. (The indicative timescale for the remaining South Kerry (East Iveragh) LAP is Q4 2022). The population growth and the level of housing proposed in the Core Strategy in the draft Kerry County Development Plan 2022 -2028 is in line with the population target specified for County Kerry in the NPF and RSES. The land use strategies for Tralee,</p>	<p>It is considered appropriate to indicate all the existing settlement boundaries as shown in the recently adopted Local Area Plans on the Maps A – U in Volume 6 and on the map browser.</p>

<p>(iii) District Towns and Villages - identify settlement boundaries and / or the compact growth area (development node) for all District Towns, Small Villages and Villages identified in the Settlement Hierarchy</p>	<p>Killarney and Listowel as contained in Volume 2, and the following local area plans, Tralee MD LAP 2018-2024, Killarney MD LAP 2018-2024, West Iveragh LAP 2019-2025, Listowel MD LAP 2020-2026 and Corca Dhuibhne EA LAP 2021-2027, are consistent with the Core Strategy. The County Development Plan contains the overarching strategic policies and objectives for the settlements as contained in the Settlement Hierarchy (table 3.6). It is within the Local Area Plan context that specific details relating to settlement boundary, compact growth area, key sustainable mobility priorities, core retail area etc are identified.</p> <p>It is intended to complete a review of all LAPs within 2 years of the adoption of this CDP. Consideration will be given following consultation with the elected members and the Municipal Districts to incorporating the associated land use strategies into this County Development Plan by way of variation.</p>	<p>Amend Objective KCDP 3-7 as follows: Prepare a local area plan for each settlement identified in the settlement hierarchy within 2 years following the adoption of this plan.</p>
<p>SRA recommend that at least 30% of all new homes in the Key Towns of Tralee and Killarney be delivered within the existing built-up footprints, that an additional objective or amendment to KCDP3-4 to support 30% compact growth target for all settlements under the Core Strategy.</p>	<p>Section 4.3.1 states that “It is an objective (see KCDP 3-4) of this plan to encourage the redevelopment and renewal of town and village cores rather than continual expansion and sprawl of settlements out into the countryside. A target of at least 30% of new housing should be delivered within the existing built-up areas of settlements on infill and/or brownfield sites”</p> <p>The Council through its zoning designations, development contribution initiatives will endeavour to ensure that at least 30% of new housing should be delivered within the existing built-up areas of settlements. A number of opportunity sites have been identified in the town plans, the development of which are a priority and will add vibrancy and vitality to the town centres. It is envisaged that masterplans will be carried out for these areas within the lifetime of the plan.</p>	<p>No proposed amendments.</p>
<p>SRA recommends wording amendments to Chapter 3 to strengthen policy as per RSES</p>	<p>The submission sets out suggested minor amendments within Chapter 3 which are considered to be appropriate changes. Full details of these changes are set out in the main report.</p>	<p>Wording amendments as set out in Main Report.</p>
<p>TII requests inclusion of Core Strategy Objectives to reflect official policy requirements including maintaining the</p>	<p>The Principles of the Core Strategy (Section 3.4) support the development of a safer, more efficient, effective, and connected transport system within County Kerry.</p>	<p>It is considered prudent to amend the Section 3.4 - Core Strategy to include and reflect the official policy requirements, summarised as; -to maintain the strategic function, capacity and safety of the national roads network, and</p>

<p>strategic function, capacity and safety of the national roads network and to ensure quality levels of service, safety, accessibility and connectivity to transport users.</p>		<p>-to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.</p> <p>It is also acceptable to update Core Strategy Mapping (Map 3.1) to reflect the extent of national road network in the County and include the N71, national secondary road, south of Kenmare.</p>
<p>Settlement Status -redesignation of Moyvane & Knockanure within the Settlement Hierarchy and designate surrounding rural area as 'Other Rural Areas' -redesignation of Listowel as a Key Town</p>	<p>Moyvane is designated as a village and Knockanure as a small village settlement in the settlement hierarchy. Demand for housing in the area can therefore be met within these settlements. Moyvane's population decreased between 2011 and 2016, therefore it is essential that development takes place within the village, which is a key tenet of this Draft Development Plan. Rural Area Types were determined based on the methodology outlined in the appendices to Volume 1 of the Development Plan. Areas were determined based on this analysis. This approach was welcomed by the OPR in their submission. To alter rural area types without justification would not be in accordance with the proper planning and sustainable development of the area.</p> <p>Key Towns are defined in RSES, with Tralee and Killarney being 2 of 14 Key Towns designated across the Southern Region. To include Listowel as a Key Town in the settlement hierarchy would therefore not be in accordance with RSES. Listowel is included in Volume 2 of the Development Plan with a Town Development Plan for same. This includes policies and objectives for the development of Listowel, including a zoning map.</p>	<p>No proposed amendments.</p> <p>No proposed amendments.</p>
<p>Population Growth -requests further population growth for Tralee & Killarney - requests further population growth and increased zoning for various other settlements including Farranfore and Cahersiveen</p>	<p>It is an objective under the RSES for the Key town of Tralee & Killarney to both grow by 30% by 2040. The population targets for Tralee & Killarney as set out in Chapter 3 for Tralee to 2028 are considered adequate to meet this target. In addition, sufficient land is zoned in both settlements (see Volume 2) to accommodate this anticipated growth.</p> <p>Section 3.10 outlines the guiding principles that were considered in allocating future population growth to the main settlements, some of which include;</p> <ul style="list-style-type: none"> • Scale of population and its existing performance. 	<p>Minor amendments have been made to the population allocation for the Key Towns based on the OPR submission.</p> <p>No proposed amendments.</p>

	<ul style="list-style-type: none"> • Compliance with the NPF (NPO 72) where there is zoned land that is serviced and that which is serviceable within the life of the plan. • Linking Core Strategies to an evidence base on the <u>availability</u> and <u>deliverability</u> of lands within the existing built-up footprints. • Extent of local services and amenities including education, community and health/leisure. • Extent to which <u>sustainable modes of travel</u> can be encouraged (walking, cycling, greenways) or public transport (bus/train). • Rate and pace of past development and the extent to which there are outstanding requirements for infrastructure and amenities. • The appropriate density and scale of development relative to the settlement and location, incl. differing rates and nature of development experienced. <p>In addition to the above the population growth figures were adjusted to cater for the demand as outlined in the Housing Strategy and HDNA. There are adequate lands zoned to cater for this anticipated population growth in these settlements and all other settlements designated in the core strategy, in the recently adopted MD Local Area Plans.</p>	
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Chapter 4 – Towns & Villages		
Key Issues	Response	Recommendations
<p>Compact growth & Regeneration [OPR] i) strengthen and provide clarification on how a number of the objectives by identifying settlements where concrete initiatives are proposed [public realm, action plans, 10-minute town concept etc]</p>	<p>As part of the planning policy review of settlements in the County through new LAP's at MD level and variations of the Town Plans at Full Council a number of brownfield sites and regeneration areas were identified. These sites formed the basis of successful applications for URDF and RRDF funding. To date the following Plan led and URDF / RRDF / ERDF funded schemes are being implemented:</p> <ul style="list-style-type: none"> • Island of Geese regeneration area and public realm. (Tralee) • Phase III Tralee Town Centre Public realm improvement works. • Áras Pdraig site masterplan. (Killarney) • Public realm and active travel segregated cycleways. (Killarney) • Cahersiveen public realm improvement scheme (Daniel O'Connell quarter.) • Upgrading of the waterfront area. (Cahersiveen) • Killorglin Public realm improvements. • Refurbishment of old courthouse for arts / cultural exhibitions. (Killorglin) 	<p>No proposed amendments.</p>

<p>(ii) provide further clarity on objectives seeking the preparation of Masterplans in the towns of Tralee, Killarney and Listowel.</p>	<ul style="list-style-type: none"> • Outdoor activity centre. (Killorglin) • Strengthening links with River Laune. (Killorglin) • New outdoor dining and performance space in the square. (Listowel) • Public realm improvements. (Listowel) • Enterprise incubator units. (Listowel) <p>In the interest of further clarity on objectives seeking the preparation of Masterplans in the towns of Tralee, Killarney and Listowel; it is the intention of the Council to proceed with masterplans for the John Joe Sheehy Road and Lohercannon Area in Tralee, Deerpark in Killarney and Castleinch in Listowel. To date the Planning Dept have made significant progress (including the acquisition of graphic design software & upskilling of staff) in the preparation of a template for such masterplans and will continue with their preparation following adoption of the County Development Plan. It is envisaged that these masterplans would be finalised in Q4 2023.</p>	
<p>Promote Town Centre First Policy</p>	<p>It is the policy of the plan to Implement the Town Centre First Approach as a mechanism to regenerate and sustain all urban core areas. It is a new initiative to support and contribute to the improvement of the physical environment of the towns and villages. This approach also outlines the supporting Investment Framework, the role of the TCF teams and Town Regeneration officer. It is envisaged that it is within this context that further concrete initiatives will be identified for the settlements in conjunction with those projects already identified in the URDF and RDF schemes.</p>	<p>Amend KCDP 4-6 Facilitate and support the development of an Action Plan for Town Centre Renewal Town Centre First Plan for Key Settlements in collaboration with communities and stakeholders.</p>
<p>Incentives are required to tackle Dereliction & Vacancy</p>	<p>The council will facilitate a town centre first approach which included a tailored approach to urban development with a particular focus on Tackling vacancy, dereliction, and underutilisation of properties/land.</p> <p>The development of derelict sites and underutilised sites and buildings is encouraged in urban areas in the interest of achieving the most efficient use of urban lands and to stimulate regeneration. It is a policy of the Plan to identify sites in a poor state of repair or neglect under the Derelict Sites Act 1990. Objective KCDP 4-22 relates to active land management to tackle dereliction. Furthermore, Objective KCDP 4-1 states “Support and facilitate the objectives and actions in Housing for All (HfA) to regenerate towns and villages, to tackle dereliction, vacancy, to deliver site assembly opportunities and to promote the sustainable development of land to achieve compact growth and increased population in these centres”.</p>	<p>Amend KCDP 4-31 Encourage and support the use of town and village centre regeneration schemes, including: Repair & Leasing scheme; Buy & Renew scheme; and Living over the shop scheme</p>

	It is deemed appropriate to include additional wording in Objective KCDP 4-31.	
<p>Public Realm -promote and improve better public spaces</p> <p>-provide walking/cycling infrastructure including upgrades to existing</p> <p>-toilet facilities at all public realm areas</p>	<p>This plan aims to harness and maximise new funding streams to improve the quality of Kerry's Towns and Villages by applying the principles of Placemaking. Placemaking involves supporting existing communities, and the creation of new sustainable communities by providing accessible, safe public realm areas, and that reflect the unique character, heritage and identity of each settlement supported by the creation of safe and attractive public place</p> <p>By engaging an integrated approach to making the town centre more accessible to visitors through a variety of methods, including improved signage, public realm and by highlighting key buildings, parks, and open spaces it is hoped identity of the town centre will emerge and that towns will become more appealing as a place to live, work and visit.</p> <p>It is an objective KCDP 4-15 to prioritise walking routes and to deliver a high level of priority and permeability for walking, cycling etc. The Council Roads Department have a schedule of works to provide for new and upgraded footpaths throughout the county.</p> <p>The Council supports the provision of toilet facilities at appropriate locations as set out in Objective KCDP 10-53.</p>	<p>No proposed amendments.</p> <p>No proposed amendments.</p> <p>No proposed amendments.</p>
<p>Sustainable Travel & Accessibility -Prioritise walking routes and to deliver a high level of priority and permeability for walking, cycling and public transport modes to schools'.</p> <p>-provision of accessible and EV parking</p>	<p>The plan seeks to prioritise the sustainable development of infrastructure for vulnerable road users which covers all scenarios and locations. Section 14.3.1 of the Development Plan sets out the Local Authority's policies and objectives in relation to sustainable transport planning. Objective KCDP 14-10 specifically refers to the development of an integrated network of cycle ways to ensure permeability within and between residential areas, linking to town centres, schools and places of work. Objective KCDP 4-15 seeks to prioritise walking routes and to deliver a high level of priority and permeability for walking, cycling and public transport modes, to encourage people to use sustainable modes of transport to work, school, shop etc.</p> <p>Objective KCDP 14-36 further supports and facilitates the sustainable provision of public parking facilities for all users at appropriate locations, including bus parking and electric vehicles within/adjacent to towns and villages, and at tourist and recreation sites.</p>	<p>Amend KCDP 4-15 - To prioritise walking routes and to deliver a high level of priority and permeability for walking, cycling and public transport modes, in accordance with the principles of movement, place and permeability as laid out in the Design Manual for Urban Roads and Streets 2019, All to ensure when consolidating development of higher densities within existing urban centres we permeable links create accessible, attractive, vibrant, and safe places to work, live, shop and engage in community life. to places of work, retail, services, educational and community facilities.</p> <p>No proposed amendments</p>

<p>- access to services and facilities should be age-friendly and accessible</p> <p>- proposes that infrastructure and facilities become Autism friendly and could consider allocating designated car spaces specifically for families of children with Autism.</p>	<p>The Council is committed to ensuring that age friendly principles and universal access will influence the design and location of housing and community facilities including the delivery of transport as set out in Sections 6.2.3 & 6.2.4 and Objective KCDP 6-23 & KCDP 6-24 which relate to ensuring that all buildings, public and open spaces, recreational and amenity areas are accessible for people with disabilities, and support for the implementation of the Age Friendly Kerry Strategy 2018-2022.</p> <p>It is a policy of the Council to recognise the need for people with disabilities to enjoy a decent living environment in the County and to support local communities, health authorities and other agencies involved in the provision of facilities to people with disabilities. Section 1.20.8 of Volume 6 Development Management Standards relates to Accessible Car Parking.</p>	<p>No proposed amendments</p> <p>New Objective – Support the provision of Autism friendly car parking spaces as long as the provision of such parking is in addition to, doesn't form part of, or replace the minimum criteria for such parking provisions as detailed in the National Disability Authority Guidelines Building for Everyone published in 2012 (including any updated/superseding document).</p>
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Chapter 5 – Rural Housing		
Key Issues	Response	Recommendations
<p>Rural Housing Policy [OPR] amend Map 5.1 Rural Area Types to ensure consistency with the evidence based approach detailed in Map 8.8 - Appendix 8 Rural Area Types, with particular reference to the Area Under Significant Urban Influence around Killarney; and (ii) omit criteria 'd) landowners including their sons and daughters who wish to build a first home for their permanent occupation on the landholding associated with their principle family residence for a minimum of a 7 / 10 years prior to the date of the planning application' from rural housing policy Objective KCDP 5-12 and KCDP 5-13 and criteria 'e) Persons who have spent a substantial</p>	<p>Appendix 8 includes the methodology used in identifying the Rural Area Types. This process was prepared in accordance with the Sustainable Rural Housing Guidelines (2005) which state that it is vitally important that a process of research and analysis be carried out into population and development trends in rural areas. The methodology for the identification of Rural Area types is based on a detailed evidence-based approach including the use of GIS data and mapping analysis. This informed the policies and objectives delivering the Core Strategy. It is considered that the omission of certain areas from the map (without constructive meaningful reasoning) totally undermines the validity of the methodology.</p> <p>It is the policy of the Council to ensure that future housing in rural areas complies with all National Policy documents including the National Planning Framework (NPO 15 & 19), the Sustainable Rural Housing Guidelines for Planning Authorities, 2005 (DoEHLG), RSES and Circular PL 2/2017. The policies for rural housing are set out in Section 5.5 of the plan and are influenced (a) by the recent pattern of development in which 59% of all new dwelling units (1,079) have been constructed outside of the County's urban areas including small Towns and Villages and (b) the emerging socio economic imbalance of this pattern where development outside small town and village settlements is predominantly in private in</p>	<p>It is therefore considered necessary to amend Map 5.1 Rural Area Types to ensure consistency with the evidence-based approach detailed in Map 8.8 - Appendix 8 Rural Area Types.</p> <p>Amend Objectives 5-12 to delete categories (d) and (e): d) Landowners including their sons and daughters who wish to build a first home for their permanent occupation on the landholding associated with their principal family residence for a minimum of ten years prior to the date of the planning application. e) Persons who have spent a substantial period of their lives (i.e., over seven years), living in the local rural area in which they propose to build a first home for their permanent occupation.</p> <p>Amend Objectives 5-13 to delete category (d): d) Landowners including their sons and daughters who wish to build a first home for their permanent occupation on the landholding associated with their principal family residence for a minimum of seven years prior to the date of the planning application.</p>

<p>period of their lives (i.e., over seven years), living in the local rural area in which they propose to build a first home for their permanent occupation from rural housing policy Objective KCDP 5-12.</p>	<p>nature, with the limited multiunit development taking place within settlements consisting largely of social housing.</p> <p>The population of the County has increased from 147,707 in 2016 to an estimated 156,902 in 2022 however many smaller towns and villages in the County are at best remaining stagnant in terms of population growth and in many cases declining. Within these small settlements there is evidential building vacancy and a continued loss of service and facilities. It is essential, therefore, that a balance be struck between facilitating people with an economic or social need to live in the rural area while ensuring that other housing demand is facilitated and encouraged within Towns and Villages. This will contribute to sustaining the population in the Counties smaller settlements, the retention of services and facilities and a reduction in incidences of building vacancy and dereliction.</p> <p>Whilst Map 5.1 contains three distinct rural area types, there remains no policy difference <i>between rural areas under significant urban influence and rural areas under urban influence</i>. In addition, within rural areas under significant urban influence there is extremely limited remaining capacity to accommodate one off dwellings. This remaining limited capacity needs to be reserved for farmers and farmer’s sons/daughters. Having regard to this limited capacity and the OPR’s submission. It is recommended that Objective 5-12(e) [<i>Persons who have spent a substantial period of their lives (i.e., over seven years), living in the local rural area in which they propose to build a first home for their permanent occupation</i>] be omitted.</p> <p>The inclusions of Objective 5-12(d) and 5-13(d) [<i>Landowners including their sons and daughters who wish to build a first home for their permanent occupation on the landholding associated with their principal family residence for a minimum of seven / ten years prior to the date of the planning application</i>] within rural areas under significant urban influence and rural areas under urban influence may result in speculative development including the selling of small plots of land for individual sites and could lead to inflated land prices for farms and create challenges for ongoing costs and productivity.</p> <p>Having regard to the above, the need to reduce car dependency, achieve our climate change obligations, the need to sustain smaller villages and settlements and the OPR’s submission, It is therefore recommended that Objectives 5-12(d) and 5-13(d) be omitted. It should be noted that</p>	
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	<p>notwithstanding this amendment sons and daughters of farmers or favoured niece/nephew will continue to be favourably considered in all rural area types.</p>	
<p>Cluster Housing [OPR] - requested to review and clarify policy approach in respect of cluster housing as set out in Objective KCDP 5-9 in order to: (i) ensure that all settlements which are subject to KCDP 5-9 (cluster housing), are included in Table 3.6 Settlement Hierarchy; (ii) clearly distinguish and identify all rural settlements within the Settlement Hierarchy that are serviced / unserved, to ensure that an appropriate planning response is tailored by reference to the scale, nature and location of the settlement in accordance with RPO26 and clarify where KCDP 5-9 (cluster housing) applies; (iii) define a settlement boundary to each small village settlement, where not already indicated in a current LAP; and (iv) amend Objective KCDP 5-9 to provide a timeline for the preparation of cluster development guidelines in support of standards detailed in section 1.5.8.2 of the Development Management Guidelines.</p>	<p>All the settlements included in Table 5.1 are already included within the settlement hierarchy in Table 3.6 and classified as either villages or small village settlements. The small village settlements of An Fheothanach and An Mhuirioch are not included in Table 5.1 as they are served by some form of public wastewater treatment system, Baile na nGall also has a public wastewater treatment system and should therefore be omitted from Table 5.1.</p> <p>Settlements listed in table 5.1 have no form of wastewater treatment and neither are there plans to provide such infrastructure. In addition section 5.5.1 <i>Identifying rural area types</i> lists the settlements in each rural area type that either (a) have a form of wastewater treatment or (b) have no form of wastewater treatment.</p> <p>It is not considered appropriate to define a settlement boundary around the remaining settlement within the context of the CDP. It is considered more appropriate to define the settlement boundaries, if applicable during the LAP process at Municipal district level.</p> <p>It is the intention of the Council to prepare cluster development guidelines following the adoption of this plan.</p>	<p>It is considered appropriate to omit the settlement of Baile na nGall from Table 5.1.</p> <p>It is recommended to amend objective KCDP 5-9 to restrict dwellings in cluster developments to permanent places of residence.</p>
<p>Rural Housing -make provision for people to live in rural areas on family land</p>	<p>The rural settlement policy is set out in Section 5.5 and Objectives 5-12/13/14. In Rural Areas Under Significant Urban Influence and Rural Areas Under Urban Influence it is an objective of the plan to facilitate farmers</p>	<p>Amendments as per above.</p>

<p>- places with population decline would be given concessions in terms of planning policy</p>	<p>including their sons or daughters to build a first home for their permanent occupation on the family farm. In Other Rural Areas it is an objective to accommodate demand for permanent residential development as it arises subject to normal planning criteria.</p> <p>The methodology and process leading to the designation of rural area types is set out in Vol 1 A Appendices and takes into account (amongst other data) population, Housing Density, Commuting patterns and recent housing construction. 'Other Rural Areas' are those areas that have low population density and by virtue of their location and topography are isolated. In these areas, the challenge is to stop sustained population and economic decline with a focus on both villages and rural areas. It is the policy in these Other Rural Areas to accommodate demand for permanent residential development as it arises.</p>	<p>No proposed amendments</p>
<p>Evidence-based approach for the Core Strategy [OPR] Amend map 5.1 Rural Area Types to be consistent with the evidence-based approach detailed in map 8.8 - Appendix 8 Rural Area Types.</p>	<p>The methodology and process leading to the designation of rural area types is set out in Vol 1 A Appendices and takes into account (amongst other data) population, housing density, commuting patterns and recent housing construction. This informed the policies and objectives delivering the Core Strategy. The area removed from map 8.8 contains approximately 792 dwellings. The average household size in these ED's is 2.88 persons per dwelling, therefore the area removed has an estimated population of 2,285. This rural area therefore contains a greater population and consequently a greater number of dwellings than Regional Towns in the County including Killorglin, Dingle and Cahersiveen. It is considered that the omission of this area from map 5.1 north of Killarney (without constructive meaningful reasoning) totally undermines the validity of the methodology.</p>	<p>It is recommended to replace Map 5.1 with that shown as Map 8.8 in Vol1 Appendix.</p>
<p>Rural Area Types -West Iveragh should be designated Other Rural Area</p> <p>- Fieries and Currow should be zoned 'Rural Areas under Urban Influence' and not "Significant</p>	<p>The majority of the West Iveragh is designated as "other rural area" under section 5.5 of the plan. The methodology and process leading to the designation of rural area types is set out in Vol 1 A Appendices and takes into account (amongst other data) population, Housing Density, Commuting patterns and recent housing construction. The resulting designation followed an evidence-based approach and are considered reasonable.</p> <p>Cromane is an area under significant urban influence. The methodology and process leading to the designation of rural area types is set out in Vol 1 A Appendices and takes into account (amongst other data) Population, Housing Density, Commuting patterns and recent housing construction. The</p>	<p>No proposed amendments.</p>

Urban Influence”. Also seeks clarification on if Cromane is a “Rural Area Under Significant Urban Influence”	resulting designation followed an evidence-based approach and are considered reasonable.	
Occupancy Clause wording amended to allow someone to sell their property before the 7 years	<p>The occupancy condition utilised by the Council is set out in the Ministerial Guidelines “Sustainable Rural Housing”.</p> <p>This condition allows for flexibility in the disposal of the dwelling to an individual with a similar housing need as the original planning applicant, and in cases of financial difficulty. The condition used, is therefore considered reasonable.</p>	No proposed amendments.

Chapter 6 – Sustainable Communities		
Key Issues	Response	Recommendations
Provision of Accessible Housing	The draft plan specifically provides for the implementation of the objectives of Housing for All – A New Housing Plan for Ireland. The plan targets the requirements for establishing and maintaining healthy, sustainable and inclusive communities through the provision of community and social infrastructure, appropriate housing for all and broader social inclusion policies across a range of sectors. The plan also considers the housing needs of people with a disability through the Housing Need and Demand Assessment Framework included in the Housing Strategy. The Draft Plan supports the provision of a diverse range of residential accommodation including for the elderly/vulnerable people. This is set out in Chapter 7 Housing for All with specific Objective KCDP 7-11 “Support the development of specialist housing, including the concept of independent living for older people and people with a disability and ensure where possible that housing for such groups is integrated with mainstream housing, in line with Housing for All objectives”.	No proposed amendments.
Strengthening of Rural Communities with Residential Development and Remote Working	The Plan provides a variety of supports for the provision for both the provision of housing in our rural areas as well as the support for remote working throughout the county. The county development plan provides for the development of housing in rural areas as long as an applicant can satisfy the requirements as set out in the county plan to ensure that those living in our rural areas are those intrinsic to the maintaining of rural ways of living.	No proposed amendments.

Some proposed amendments to Objective Wording in Chapter 6	Some of the submissions received set out suggested minor amendments to Objectives KCDP 6-3, 6-4 & 6-9 which are considered to be appropriate changes. Full details of these changes are set out in the main report.	Wording amendments as set out in Main Report.
Young People - deficit of focus on Youth in the Draft CDP - stronger commitment to support a diverse evening/nightlife	The Draft Plan highlights the importance of young people particularly in Chapter 6 Sustainable Communities Section 6.3.5 Children and Young People. It is an objective of the Draft Plan to “Work with the relevant agencies and authorities to advance the physical, social, and cultural needs of children and young people” [KCDP 6-47]. The council will continue to work with all stakeholders KDYS, etc to provide continued provision and enhancement of facilities and amenities for children and young people.	Additional text will be included in Section 6.3.5 and in other sections of the plan as set out in the Main Report. New Objectives are also proposed as follows: Engage with Comhairle Na nÓg and other youth organisations in relation to identifying the needs of children and young people; Finalise the Kerry Play & Leisure Policy and support its implementation throughout the period of the Plan; and Encourage the development of diverse evening/nightlife activities that focus on youth participation and facilities.

Chapter 7 – Housing For All		
Key Issues	Response	Recommendations
Provision of Traveller Accommodation [OPR]	<p>Circular 35/2018 issued from the Department of Housing, Planning and Local Government to all local authorities on the 19th July 2018 notifying all local authorities of the requirement to prepare and adopt a 5 year Traveller Accommodation Programme covering the period 1st July 2019 – 30th June 2024. Consultation in the preparation of the Traveller Accommodation Programme was essential in order to ensure that the concerns of all those affected by the Plan were considered and to ensure a fully comprehensive response to accommodation needs of travellers was produced.</p> <p>In terms of the Traveller Accommodation Programme, it should be noted that it is a key priority of the Council to ensure that groups with special housing needs, such as the elderly, people with disabilities, the homeless, those in need of emergency accommodation and Travellers are accommodated in a way suitable to their specific needs. In this regard KCDP 7-20 sets out to secure the implementation of the Council’s Traveller Accommodation Programme 2019-2024 and to review this programme if required and/or deemed to be necessary, during the Plan period. Therefore, there is no requirement at this stage to identify individual sites and needs are planned to be met from existing sites or from existing housing stock. It is intended to address the issue of traveller</p>	It is recommended that ‘Traveller Accommodation’ is included in the Zoning Matrix contained in Volumes 2 and 6 of the Draft Plan.

	<p>accommodation plans based on the current Traveller Accommodation Programme 2019-2024 and through the Local Area Plan process.</p> <p>There are a number of dedicated halting sites located in Tralee and Killarney. These sites are zoned R2 Existing Residential in their appropriate plan. This zoning designation is sufficient to cater for any further expansion as evident in the recent Part 8 for an expansion to the Rathass site in Tralee.</p>	
<p>Provision of Social Housing</p> <p>- demountable units should be used more regularly where it is deemed acceptable by the tenant.</p> <p>- more housing units need to be provided for single individuals</p>	<p>The allocation of housing and the management of the housing list is not within the remit of the county development plan. The CDP and LAPs do have a key role to play in the provision of zoned land and plan led infrastructure. Chapters 6 & 7 contain a range of policies and objectives seeking the delivery of a mix and range of housing types within developments particularly a greater number of smaller residential units in all developments to cater for the housing needs of all sectors of society.</p>	No proposed amendments.
<p>A diverse range of Housing Types</p> <p>-Support the development of assisted living developments close to town centres</p>	<p>The Draft Plan recognizes the need for a diverse range of accommodation options. Chapters 6 & 7 contains a number of objectives which seek to facilitate and support the provision of a range of accommodation types for members of the Traveller community, the homeless, people with disabilities and ethnic minority groups.</p> <p>Objective KCDP 7-16 of Chapter 7 Housing for all provides the support within the plan to “Facilitate the development of housing for older people in accordance with Housing for All”. Objective KCDP 7-17 of chapter 7 Housing for all provides the support within the plan for the provision of Semi supported/assisted living type developments.</p>	No proposed amendments.
<p>Homelessness - should be an objective of this plan to provide Homeless Accommodation in each electoral area.</p>	<p>Objective KCDP 7-12 supports the development of a Homelessness Strategy for the County, in conjunction with allied stakeholders including the HSE, Tusla and the National Homeless Action Committee.</p>	No proposed amendments.

Chapter 8 - Gaeltacht Areas, Culture & Heritage		
Key Issues	Response	Recommendations
<p>Údarás na Gaeltachta sets out proposed wording amendments primarily to Chapter 8.</p>	<p>The suggested wording amendments are largely acceptable.</p>	<p>Full details of the wording amendments are set out in the Main Report.</p>
<p>Settlement Issue -states that the Council is failing to protect the Gaeltacht and highlights the issue of planning in the context of housing in the Gaeltacht</p> <p>-Plan should focus on giving support to those who wish to settle in their native area</p> <p>-Council should take a proactive approach to housing within the Gaeltacht.</p> <p>-Need for additional language policies, particularly in the area of housing.</p> <p>-Request new guidelines in respect of one-off housing i.e. to make a requirement that a person has a good command of the language to be permitted to build a house.</p> <p>-Provision of more Housing in An Gaeltacht</p>	<p>Kerry County Council has to date, actively facilitated people from rural Gaeltacht areas who wish to build a home in the Gaeltacht. Between March 2015 and September 2021 there were 126 planning applicants in the Corca Dhuibhne Gaeltacht area. From an analysis of these applications most of the planning applicants were sons /daughters of farmers / landowners or were from the immediate local Gaeltacht area. Of these applicants, 101 (80%) were granted permission.</p> <p>It is the policy of the council as set out in Chapter 8 to promote the daily use of Irish as a living language. Therefore, the majority of the Gaeltacht areas are designated as either Rural Areas Under Urban Influence or Other Rural Areas under Section 5.5.2 rural settlement policy. It is an objective under KCDP 5-13 (Rural Areas Under Urban Influence) that the following individuals can be favourably considered for housing in these areas:</p> <p>a) Farmers, including their sons and daughters or a favoured niece/nephew. b) Persons who have spent a substantial period of their lives (i.e., over seven years), living in the local rural area.</p> <p>In addition, a number of settlements have been designated in the Gaeltacht Areas as suitable to accommodate small scale clusters of rural housing served by their own individual WWT system. This offers opportunities for people from the Gaeltacht who do not have access to family lands to construct a dwelling in the rural Gaeltacht community.</p> <p>Finally, Objective KCDP 8-8 ensures that a minimum of 66% of the completed units within housing developments in all Gaeltacht areas are reserved for Irish speakers</p>	<p>No proposed amendments.</p>
<p>Requests reference to Language Plan</p>	<p>The Council acknowledges and understands the statutory basis and supports the primary aims of the Language Plan for West Kerry as set out under Acht na Gaeltachta 2012. In the interests of clarity with respect to Language Plans it is agreed that KCDP 8-6 should be amended as set out in the submission received.</p>	<p>Amend KCDP 8-6 as follows: Facilitate and support Language Plans of the County: Tobar Dhuibhne (2017) - Plean Teanga Chiarraí Thiar (2018), Dúchas an Daingin - Plean Teanga for Bhaile Seirbhíse Gaeltachta Daingean Uí Chúis and Brí Uibh Ráthaigh - Plean Teanga Chiarraí Theas (2019) language plans, to achieve</p>

		<i>their target of increasing the number of daily Irish Speakers, long term in Gaeltacht areas.</i>
Requests that Linguistic Impact Statement submitted with planning applications and Occupancy Clause applied	It is agreed that a linguistic impact statement shall be required where three or more residential units are proposed on lands zoned for R1 and R4 use. The linguistic impact statement must be prepared by an independent person qualified in the area of language planning.	Amend section 8.1.3.2 of the Draft Plan as follows: ' All applications for three or more dwellings in the Gaeltacht area will be referred to An Coimisinéir Teanga for comment. The linguistic impact statement shall be prepared by a person qualified in the area of language planning. Amend KCDP 8-7: Ensure that developments of multiple residential units (3 or more) in An Ghaeltacht settlements shall be subject to linguistic and occupancy requirements in order to protect the linguistic and cultural heritage of the Gaeltacht areas including the promotion of Irish as the community language. The linguistic impact statement shall be prepared by a person qualified in the area of language planning. Amend KCDP 8-8 to include: A language Enurement Clause (LEC) will be applied for a duration of 15 years from the date of first occupancy of the unit.
Short Term Lets - commends the Council in trying to reduce the number of Air B+B Corca Dhuibhne, recommended to extend it to Uíbh Ráthach. Requests change of use from long term to short-term letting as there is a shortage of residential accommodation is prohibited.	Policy in relation to short-term letting is outlined in Section 10.3.5.3 and highlights the need to ensure that the short-term letting of properties does not displace or remove properties from the long-term rental market. It is an objective under KCDP 10-31 to prohibit the change of use of residential properties to short-term letting in established residential areas and newly constructed residential developments and under objective KCDP 10-32 to prohibit the change of use of derelict/vacant buildings to short-term letting where such buildings are suitable for long-term residential accommodation. Separately, but related the change of use of a property from use as a place of permanent accommodation to a holiday home / short-term letting is a material change of use and requires planning permission. The council's planning enforcement unit have investigated a number of properties in the Killarney and Dingle areas and a significant number of statutory notices have been served ordering the cessation of the short-term letting of these properties.	No proposed amendments.

Chapter 9 - Economic Development		
Key Issues	Response	Recommendations
<p>Employment Zoned Land [OPR] - Having regard to the requirement to provide clarity, evidence and transparency in accordance with Section 6.2.5 of the Development Plans Guidelines for Planning Authorities – Draft for Consultation (August 2021), the tiered approach to zoning under NPO72, and the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), the planning authority is requested to: (i) provide an evidence-based justification for the overall quantity and the spatial location of all employment generating land use zonings; (ii) consider all relevant infrastructural constraints in applying the tiered approach to zoning; (iii) consider the necessity to protect the capacity of existing and future national roads; and (iv) omit any lands which cannot be justified under (i), (ii) and (iii).</p>	<p>Lands zoned for employment in Tralee, Killarney, Listowel and the Tarbert-Ballylongford Landbank are included in Draft Kerry County Development Plan 2022-2028 and reflect existing town and county development plan provisions. Other employment zonings are included in the relevant Local Area Plans. The zoning of all lands has been subject of analysis with respect to the needs of a particular settlement. All zonings have also been subject to SEA, HDA, and SFRA as part of the plan preparation process.</p> <p>It is not possible at this stage of the Plan Review process to carry out the required analysis on employment lands given the size and scale of the County. However, it is proposed to include a commitment to carry out an Employment Land Availability Study during the lifetime of the Plan which will include an assessment of the infrastructure requirements of each employment site which will inform the application of Tiering, consider how best to support the delivery of compact growth and the availability of sustainable travel options. However, it should be noted that the Draft Plan in providing for employment zonings within the 3 settlements of Tralee, Killarney and Listowel has provided a range of options which reduces the demand for more remote rural sites which assists with the delivery of compact growth and provision of sustainable transport options.</p> <p>The Economic Development Unit of KCC have also identified a number of Strategic Enterprise Sites throughout the county. This along with County Kerry's COVID-19 Economic Recovery Plan 2021 provides an overall framework for the economic development of the County in the short to medium term.</p>	<p>No proposed amendments.</p>
<p>Quarries & Minerals [OPR] include a map to show the location of quarries and minerals across County Kerry.</p>	<p>An analysis of quarries and deposits has been carried out based on GSI data and the S261 Quarries Register. It is considered acceptable to include a map highlighting minerals across the county in the Plan, namely aggregates and crushed rock potential, with areas of very high and high potential shown on the map. The indication of quarries on this map is not considered appropriate at this time due to the status of some quarries in the county.</p>	<p>Include a map indicating minerals & aggregates across the county.</p>

<p>Strengthened Objectives in support of Strategic Employment Locations, Regional Knowledge Diffusion and Smart Specialisation [SRA]</p>	<p>The Draft Plan recognises the importance of economic development throughout the county. The Plan aims to enhance the current offering, attract new development and promote sustainable economic development. The points raised by the Assembly are noted and amendments to existing objectives and insertion of new objectives are set out in the recommendations below with a view to strengthening the aims and objectives of Chapter 9. The policies of the plan were also informed by County Kerry's COVID-19 Economic Recovery Plan 2021 which was developed as a response to the challenges and opportunities facing the Kerry Economy. This plan in conjunction with the LECP provides an overall framework for the economic development of the County in the short to medium term. On foot of the above 38ha in Tralee, 27.9ha in Killarney and 38.8ha in Listowel were zoned for commercial/enterprise/economic development. There are additional lands zoned in the environs of Tralee at Monavalley/ Ballybeggan (120ha) and in Killarney at Deerpark/Tiernaboul(89.8ha). It is also an objective of the plan to prepare masterplans for some of these areas.</p>	<p>Additional text proposed to be included in Section 9.4.2, Section 9.6.1.1 and Section 9.4.1. Small changes are proposed to Objectives KCDP 9-8, KCDP 9-6 KCDP 9-34. A new objective is proposed as follows: Support the role of the Munster Technological University as a driver of the regional economy and key stakeholder for a Learning Region through support for funding to the higher and further education training sectors and delivery of recommendations under a forthcoming Learning Region Strategy for the Southern Region.</p>
<p>Employment / Jobs Growth -diversification of the job base in the county should be named as a specific objective</p>	<p>The theme of economic diversification across the County is well highlighted throughout the County Plan. One of the aims of this plan is to heighten the sustainability of the traditional sectors of tourism and agriculture for example and ensure that they continue to play a significant role in driving Kerry's economy. This plan includes actions centred on diversifying both the tourism and agriculture sectors through further expansion of Kerry's local food economy. Objectives KCDP 9-42 & 9-43 supports these aims. In addition, a key stated goal of the Kerry Local Economic and Community Plan 2016-2021 is Diversifying the Kerry Economy, this plan is incorporated into the Draft County Plan. The Local Economic and Community Plan 2016-22 (LECP) was adopted by the Council in 2016 and currently been reviewed. The purpose of the strategy is to set out the actions and objectives needed to promote, support and strengthen the sustainable development of the economy and communities of Kerry. It is within this context and the County Development Plan that funding, projects and investment is highlighted.</p>	<p>New Objective: Support and facilitate local hubs to create and support Networks of Interest in relation to the use of new technologies e.g farmers, creative artists, remote workers who may wish to undertake sectoral engagement, and other relevant sectors</p>
<p>Sustainable & Balanced Economic Development -Seeks balanced development for the county to include North Kerry</p>	<p>The plan seeks to provide and promote balanced regional economic development. The RSES recognises the national and international importance of the Shannon Estuary, its potential to attract multinational development and the significant work that has been undertaken to progress its promotion and development. Objectives 9-22 to 24 seeks to support and promote the delivery of the Strategic Development Locations (SDLs) as set</p>	<p>No proposed amendments.</p>

<p>-Requests inclusion of North Kerry within the Knowledge Triangle</p>	<p>out in the SIFP for the Shannon Estuary in addition to marketing and seeking of financial and expert support.</p> <p>The Kerry Hub & Knowledge Triangle has long been defined as including the areas of Tralee, Killarney and Killorglin. The designation of this area does not exclude other parts of the county, with development in all areas of the county supported by this Development Plan and its Core Strategy. As outlined above RSES identifies the potential of North Kerry in the context of the Shannon Estuary and the identification of two areas of economic significance supporting each other is hugely positive. Listowel and Ballybunion have been identified as a Regional Towns in the Settlement Hierarchy in recognition of their role in North Kerry. The Shannon Estuary Coastal Network as included in RSES is also supported by the Development Plan. The Kerry COVID 19 Economic Recovery Plan sets out the range of economic potential of the entire County across a number of key pillars of growth.</p>	<p>No proposed amendments.</p>
<p>Education & Training - role of Kerry Education and Training Board should be specifically mentioned in the Development Plan</p> <p>-Upskilling & Research is emphasised within the Plan</p> <p>-Recognise importance of MTU</p>	<p>Section 6.3.4 and objective 6-41 acknowledges the role of Kerry Education and Training Board. In addition, it is an objective of the plan to facilitate and support the ETB, MTU, Dept. of Education and allied stakeholders in the provision of education and skills, training and associated educational facilities.</p> <p>Section 9.7 of the plan acknowledges the importance of ‘research, upskilling and reskilling’ in all sectors, in order to promote the development of a sustainable economy.</p> <p>This is very important not only to the Kerry Hub and Knowledge Triangle but across all of the County including Dingle Hub, Kerry Education and Training Board and there has been ongoing collaboration with the Munster Technological University and other research centres and higher education institutes. these provide excellent opportunities for the communities to participate in research and upskill themselves in the process.</p> <p>The plan recognises that development of the Munster Technological University has the potential to deliver significant economic benefits to students in the town and wider county, for local economy and society. The creation of MTU & KETB sub offices on Denny Street has offered further vibrancy to the area. The Council would welcome an expansion of this</p>	<p>Amend KCDP 9-6 “Engage and collaborate with Regional Partners, Local Authorities, Third Level Education Sector the MTU and the Kerry Education and Training Board and the broader business community as appropriate, to promote the continued development of the Kerry economy on a regional basis in the context of the Southern Regional Enterprise Plan, the Atlantic Economic Corridor (AEC) and other regional initiatives.”</p> <p>Amend KCDP 9-9 “Maximise Optimise the amount of employment growth and enterprise creation across all economic sectors and ensure that growth is distributed in a sustainable manner across the County in accordance with the Settlement Strategy.”</p> <p>Amend KCDP 9-32 to include “and active local community”.</p> <p>Amend KCDP 9-33 to include “Life wide learning”.</p> <p>It is recommended to include reference to the Knowledge Economy in Section 9.7.3.and hugely significantly tourism, recreation and Knowledge Economy is very important.</p> <p>KDDP X Support and facilitate local hubs to create and support Networks of Interest in relation to the use of new technologies e.g farmers, creative</p>

	<p>physical presence in the town centre. Objectives in this regard are included in the Tralee Town Plan section.</p> <p>Chapter 9 recognises the regionally significant role of the MTU and contains a range of policies and objectives to facilitate its growth and development.</p>	<p>artists, remote workers who may wish to undertake sectoral engagement, and other relevant sectors.</p>
<p>Highlights the significant role of Agriculture</p>	<p>Kerry County Council recognise the key role agriculture and its related employment play within the County. There is a focus on diversification with agri-tourism, agri-food and agri-tourism as well as sustainable farming including micro renewable energy potential. Objective KCDP 9-34, KCDP 9-39 and KCDP 9-41 seek to facilitate and support sustainable employment initiatives and diversification within the agricultural sector.</p>	<p>Additional and revised text has been included to clarify the important roles that Agriculture and the marine contribute to both employment and economic activity in the County.</p>
<p>Remote Working & Broadband</p>	<p>The role of remote working and Digital Hubs are recognized in the Draft Plan. Objective KCDP 9-43 states that it will facilitate and support digital hubs. The provision of Digital Hubs/Co-working spaces helps to support growth in innovative local enterprises and provide technology enabled spaces, whilst also focusing on supporting local industries and the community. There are several 'Hubs/Co-working' spaces all over Kerry as set out in Table 9.3. In relation to remote working the Council considers it vital to maximise the opportunities afforded for remote-based working by developing infrastructure, technology and broadband access in hubs/co-working spaces in towns and villages as these developments can contribute significantly to the local economy and reduce the need to commute. It is the policy of the council to support remote working in co-working hubs.</p>	<p>No amendments proposed.</p>

Chapter 10 – Tourism		
Key Issues	Response	Recommendations
<p>Failte Ireland suggest several wording amendments throughout the Plan.</p>	<p>The suggested amendments are considered appropriate in most instances and strengthen the Tourism chapter of the plan.</p>	<p>Include additional text and amend objectives in relation to; Purple Flag. Theatre, Arts, Music as part of the night time economy. Encourage the increased use of Irish in tourism. Include Fáilte Ireland in a number of objectives as a support and collaborating agency. Supporting the Dingle Peninsula 2030 Vision. Seasonal Accommodation for tourism staff. Wild Atlantic Way tourism/DEDP tourism plans. The Beara Peninsula.</p>

<p>Valentia/UNESCO -Concerns raised in relation to the consultation carried out in relation to the proposed UNESCO site in Valentia. -Submissions support the UNESCO accreditation application for Valentia Island Transatlantic Cable Building.</p>	<p>It is an objective of the plan, (10-62) to secure the designation of Valentia Transatlantic Cable Station, Cable Terrace, First Message Building Structure in the Cable Field and the ensemble of associated sites as a trans-national UNESCO World Heritage Site with its partner site in Heart's Content, Newfoundland, Canada.</p>	<p>No amendments proposed.</p>
<p>North Kerry Tourism -states that over the years North Kerry has been totally neglected as a tourist destination</p>	<p>The Local Authority acknowledges the role North Kerry plays in its tourism offering for the county, from the historical, heritage and outdoor recreational facilities of the key town of Listowel to the seaside towns of Ballyunion and Ballyheigue. The Draft Plan sets out several policies and objectives in relation to improving the tourism offering including promoting and supporting sustainable tourism (KCDP 10-1 to 10-4) but specifically supporting the development of Greenways in North Kerry (section 14.3.4.1) the North Kerry Way, and the Cliff Coast VDEP & its associated objectives.</p>	<p>No amendments proposed.</p>
<p>Niche Tourism Sectors -need to be encouraged and supported - could lengthen stays and help extend the tourist season</p>	<p>Section 10.4.1 of the Draft Plan relates to Adventure Tourism with Objective KCDP 10-33 specifically related to this type of tourism. Niche sectors such as Adventure tourism, Eco tourism, adventure travel, linguistic/ cultural and hill walking etc are encouraged and supported throughout the county.</p>	<p>No amendments proposed.</p>
<p>Walkways/trails/ cycleways -Further support for local communities in the development of walking/cycleways and trails upgrading and maintaining walkways.</p>	<p>The Draft Plan provides for the upgrading and maintenance of walkways as set out in Objective KCDP 10-2, KCDP 14-1, KCDP 14-3 and KCDP 14-17. It is the policy of the plan to enhance and improve existing walkways/paths as resources and funding permit. These projects are undertaken at a municipal district level.</p> <p>In addition, the county's associated County Kerry Tourism Strategy also acknowledges the potential of the county as a tourist destination and supports the facilitation of a number of greenway/peatways and blueway projects. The pursuit of same is therefore already supported in the CDP.</p>	<p>No proposed amendments.</p>
<p>Facilities - seeks the provision of public toilets and other facilities on all blue flag and busy beaches,</p>	<p>Objective KCDP 10-53 seeks to facilitate and support the provision of appropriately designed and located toilet and changing facilities at blue flag beaches in the county and at other locations subject to need assessment and environmental compatibility.</p>	<p>No proposed amendments.</p>

historical site and scenic amenities.		
Blueways/coastal walks The submission seeks the maintenance of existing coastal walks, against coastal erosion, and provision of blueways.	Section 11.4.2 contains policies in relation to coastal erosion and Objective KCDP 11-68 seeks to support measures for the management of and the protection against coastal erosion.	No proposed amendments.
Agritourism -definition of agri-tourism needs to be broadened.	The draft plan is fully supportive of farm diversification and acknowledges its importance to rural communities. It is the policy of the Council, supported by Objective KCDP 9-41, to support rural development and facilitate farm diversification and new employment / enterprise opportunities within the agriculture sector, subsidiary to agricultural uses.	No proposed amendments.
Major crowds & sensitive areas. -consideration be given to requiring arrangements to cater for major crowds on beaches and sensitive areas of natural heritage or environmental sensitivity.	The aim of the Development Plan is to protect and enhance Kerry's heritage and environment, while providing a world class experience for tourists, within an overall focus of developing green and sustainable tourism. It is important that tourist numbers do not exceed unsustainable levels and damaging the natural heritage and environment. It may be considered necessary to put arrangements/management plans in place to cater for major crowds on beaches and sensitive areas of natural heritage or environmental sensitivity.	include a new objective "To explore best management practices for sensitive tourism destinations particularly during the peak tourist season."

Chapter 11 – Environment		
Key Issues	Response	Recommendations
Flooding [OPR & OPW] - (i) carry out the Justification Test for existing built-up lands (ii) incorporate all key flooding requirements and mitigation measures identified in the SFRA and Justification Test into the Plan, for particular sites in Tralee, and Killarney; (iii) include specific objectives in the plan to ensure development is restricted to minor development and to support the	Having regard to submissions from the OPR and the OPW, the requirements of The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009), as amended by Circular PL 2/2014, the planning authority consider it necessary to: (i) incorporate all key flooding requirements and mitigation measures identified in the SFRA and Justification Test into the Plan, in particular in respect to sites in Tralee and Killarney. (ii) include specific objectives in the plan to ensure development in those areas is restricted to minor development and to support the requirement for a site specific flood risk assessment- The Planning Authority will use all datasets available to produce combined Flood Zone A and B mapping and this mapping will be overlaid on land -use	Amend the flood zoning maps for the towns indicating the flood Zones A and B, for fluvial/coastal. Include the following text in section 11.5.2 within the existing built-up areas of some town centres an existing residual flood risk remains pending the construction of flood mitigation infrastructure. The redevelopment of these existing sites and the undeveloped infill sites should take into consideration the identified and mapped flood risk in any design proposal. Development proposals in relation to these sites should seek to avoid the identified flood risk areas or if not possible ensure that the flood risk is not increased for adjacent properties and consider flood resilient or flood resistant construction design methodologies.

<p>requirement for a site specific flood risk assessment - Tralee - Killarney - Listowel -</p>	<p>zoning, in order to assist the assessment of consistency of the plan with the sequential approach as set out in the Guidelines.</p> <p>The towns have been identified by the OPW CFRAMS project as an area at risk of either/both fluvial and tidal flooding. Preliminary flood prevention measures have been developed and costed by the OPW.</p> <p>The OPW have identified preferred flood mitigation infrastructure to mitigate flood risk arising from the river network and from the coast in the CFRAM Flood Risk Management Plan for Tralee Bay – Feale River Basin (UOM 23). It is an objective of this plan to facilitate the implementation of this infrastructure and the Tralee flood relief scheme subject to project level environmental assessments.</p> <p>The OPW have identified preferred flood mitigation infrastructure to mitigate flood risk along the Feale in the CFRAM Flood Risk Management Plan for Tralee Bay – Feale River Basin (UOM 23). It is an objective of this plan to facilitate the implementation of this infrastructure and the Clieveragh flood relief scheme. For more details regarding flood risk management see Chapter 11 Environment, Chapter 13 Water and Waste Management and the Development Management Standards and Guidelines. It is also an objective to prepare a masterplan for the Castleinch lands, this plan will include flood management proposals.</p> <p>As per response to submission KE-C1-365, R1.6.1 in Tralee has been reverted to agriculture P1 zoning.</p> <p>In accordance with the Department Guidelines The Planning System and Flood Risk Management, vulnerable development such as residential development should not be located upon lands at risk of flooding. The Planning Authority is satisfied that this approach is appropriate and will result in the sustainable development of the town.</p> <p>It is necessary to include new objectives to ensure that only water compatible or non-vulnerable development is permitted in areas of flood risk. These new objectives will be applicable to all those areas that are located within a flood Zone A and Flood Zone B (namely those specified in the SFRA including Sites C5.2, C5.4, M1.1 in Tralee, and Sites C5.1 9, R1.6.1, R1.6.2, R4.6.1 and R4.6.2. in Killarney) Applications for any future development in these areas shall be considered in accordance with Section</p>	<p>Amend the zoning from R1 (proposed residential) to P1 (agriculture), see map in Appendix.</p> <p>Include a new objective 11-66a; ensure that zoning or development proposals support and do not impede or prevent the progression of flood relief schemes throughout the county.</p> <p>Include a new objective 11-66b Ensure that access requirements are preserved for the maintenance of Arterial Drainage Schemes and Drainage Districts.</p> <p>Include new objectives for following specific sites and indicate these on the maps;</p> <p>Tralee; TR114- (C5.2); Ensure that only water compatible development is permitted</p> <p>TR115- (C5.4); Ensure that less vulnerable development and water compatible development only is permitted with suitable mitigation measures</p> <p>TR116-(C5.5l); Ensure that less vulnerable development and water compatible development only is permitted with suitable mitigation measures</p> <p>TR117- (M1.)1 Ensure that less vulnerable development and water compatible development only is permitted with suitable mitigation measures</p> <p>TR118-(C2.1.1/R1.6.2/R1.6.3/S1.1); Ensure that highly vulnerable development is not permitted in areas identified in Flood Zone A and B. TR119-Development within existing built-up areas located within Zone A & B; Ensure that development proposals avoid the identified flood risk area, or if not possible ensure that proposals avoid the identified flood risk properties and consider flood resilient or flood resistant construction design methodologies.</p>
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	<p>5.28 of the Guidelines, and that a Site Specific Flood Risk Assessment (SSFRA) will be required.</p> <p>The redevelopment of existing sites and the development of infill sites in the town centres/ settlements that are adjacent to /within flood risk areas should take into consideration the identified flood risk in any design proposal. Development proposals should seek to avoid flood risk areas of the site, or if not possible should ensure that the flood risk is not increased for adjacent properties and consider flood resilient or flood resistant construction methods. Development proposals must be in accordance with The Planning System and Flood Risk Management Guidelines (2009).</p> <p>It is acknowledged that Site R1.6.1 (Ballyard, Tralee) is located within a Flood Zone A, it is considered necessary to amend the zoning to P1 Agriculture. (This was an errata in the plan preparation process.)</p>	<p>Killarney; KA84- (C5.1) Ensure that only water compatible development is permitted in flood zone A and less vulnerable development is permitted in flood zone B.</p> <p>KA85- (R1.6) Ensure that highly vulnerable development is not permitted in areas identified in Flood Zone A and B.</p> <p>KA86-(R4.6.1/R4.6.2/R1.6.2) Ensure that highly vulnerable development is not permitted in areas identified in Flood Zone A and B.</p> <p>KA87-(C5.2) &Development within existing built-up areas located within Zone A & B; Ensure that development proposals avoid the identified flood risk area, or if not possible ensure that proposals avoid the identified flood risk properties and consider flood resilient or flood resistant construction design methodologies.</p> <p>Listowel; Lis-98 (O.1.1) Ensure that a Stage 3 Detailed Flood Risk assessment shall be carried out as part of the preparation of a masterplan for these lands.</p> <p>LIS; 99-(C5.1) Ensure that only water compatible development is permitted.</p> <p>LIS-100-(C2.1.1) Site specific flood risk assessment shall be submitted with any application.</p> <p>LIS-101-(C2.1. 2)Ensure that proposals avoid the identified flood risk areas or if not possible ensure that the flood risk is not increased for adjacent properties and consider flood resilient or flood resistant construction design methodologies.</p> <p>An objective number will be placed on each site (above) on the landuse map with a corresponding objective set out at the end of Volume 2 for Tralee, Killarney and Listowel.</p>
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	<p>As per response to submission KE-C1-365, the zoning of a portion of the Tarbert/Ballylongford site has been amended for habitat reasons and therefore there will be no vulnerable development on the site. Clieveragh; A flood relief scheme is proposed for this area. Details of the flood risk area's A and B will be indicated on a map (see appendix). Greenville Road; With respect to the lands at IslandGanniv North, on Greenville Road, the Planning Authority has carried out additional further assessment on these lands and is satisfied that this land is outside flood zone B (the land rises sharply at this point) and that subject to a flood risk assessment at planning application stage that the development of these lands would be in accordance with the Guidelines.</p> <p>The Council acknowledge the proposed flood relief schemes planned in Kenmare, Ballylongford, Castleisland & Tullig, and Dingle. The Council will have full regard to the development of these proposed schemes, to ensure that zoning or development proposals support and do not impede or prevent the progression of these measures. It is considered prudent to include an additional objective to facilitate and support these schemes.</p> <p>The Council will have regard to all OPW schemes in the preparation of all plans and projects, it is not considered appropriate to include a county wide register for flood risk areas. All these areas are included within the SFRA for each MD LAP.</p> <p>In relation to Arterial Drainage Schemes, the Council will endeavour to ensure that access requirements are preserved for the maintenance of Arterial Drainage Schemes and Drainage Districts. It is acknowledged that applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas, and it is considered prudent to include an additional objective regarding this.</p> <p>The findings of the SFRA have been incorporated into the landuse zoning and policies.</p>	<p>Additional text to be added to Section 11-5 "full regard to the scheme to ensure proposal support and do not impede"</p> <p>Amend Objective KCDP 11-61 – include benefiting lands and maintaining access for OPW.</p>
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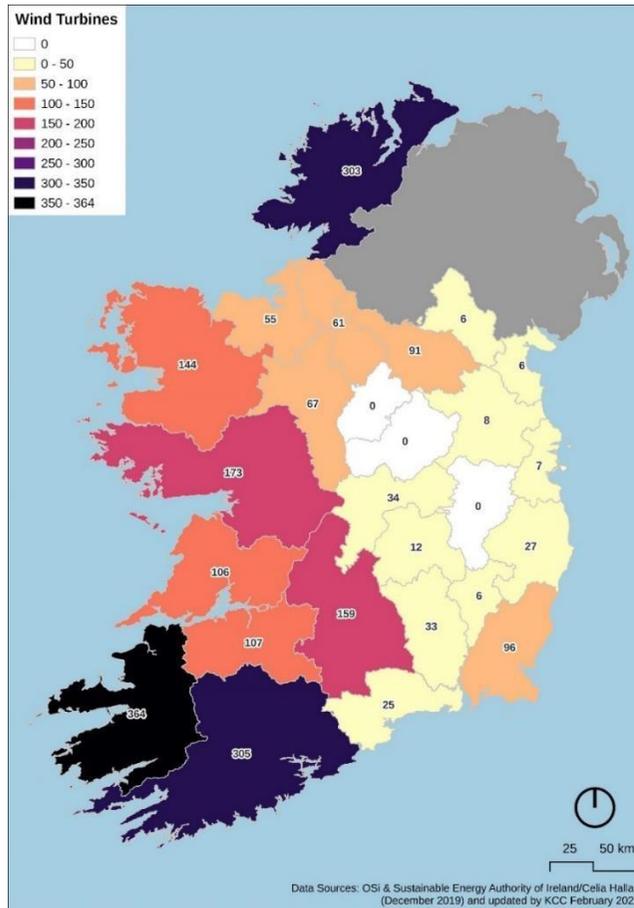
<p>[SRA] Support Green Blue Infrastructure (GBI) and Nature Based Solutions (NBS) and refer to the preparation and implementation of a forthcoming Southern Region Framework for GBI and NBS for the under the Interreg Europe “Blue Green Cities” project,</p>	<p>Chapter 11 contains the general planning policies and principles which will ensure that the natural environment, biodiversity and ecosystems are protected, delivering benefits essential for all sectors of society and that it contributes to efforts to reverse the loss of biodiversity and the degradation of ecosystems and the environment. The comments received in relation to greater engagement with the SRA in relation to frameworks is welcomed. A new objective is proposed to be inserted to reflect this as set out below.</p>	<p>New Objective: Engage with the Southern Regional Assembly in implementing the forthcoming Southern Region Framework for GBI and NBS for the under the Interreg Europe “Blue Green Cities” project and support the development of a County level GBI and NBS framework and/or similar initiatives to assist Development Plan implementation for achieving greater levels of GBI and NBS actions.</p>
<p>The Department of Heritage states that the hen harrier needs to be protected</p>	<p>The importance of winter roosting sites to the Hen Harrier Population is noted. It is also noted that the IHHWS contains data in relation to such sites. It is considered that developers should engage with such non-statutory holders of ecological data and that this should occur at the pre-planning stage, so as to inform project design, scale and location.</p>	<p>Section 11.2.1 additional text: <i>In order to inform project design, scale and location, developers should engage with statutory and non-statutory holders of ecological data at pre-planning stage, so as to seek to avoid inadvertent damage, particularly in relation to EU Directive Annex species. As part of this, it should be noted that the Irish Hen Harrier Survey (IHHWS) contains Hen Harrier winter roost data.</i></p>
<p>Requests that the plan prioritises role of biodiversity and develop connections between existing urban 'biodiversity & climate resilience hotspots'</p>	<p>The role of biodiversity is strongly acknowledged in the plan. Chapters 2 and 11 specifically address biodiversity within its wider environmental context including biodiversity links to air and water quality. The CDP also includes KCC’s Biodiversity Action Plan (BAP) and a commitment to support the roll out of a county specific Climate Action Plan (CAP). In addition, the CDP has been subject to a SEA and AA under both the SEA and Habitats Directive to ensure the plan is compliant with nature conservation legislation. The LA is satisfied that the importance of biodiversity is already central to the plan and underpins the CDP process.</p>	<p>Amend the Biodiversity Action Plan as follows: Target 4.2 Works with the community, “biodiversity mentors” and other groups in the protection and enhancement of biodiversity... Add new Action 4.2.3: Seek to develop connections between existing urban 'biodiversity & climate resilient hotspots' such as Tralee Bay Wetlands and local community allotments and gardens</p>
<p>Requests that public consultation is carried out in relation to the development of Tree Strategies, that a Tree Strategy for the County is developed, and that communities are supported in the process of Tree Preservation Orders around the County.</p>	<p>Trees and woodlands, particularly those that are broadleaf deciduous, provide a valuable resource in terms of both biodiversity and by contributing to a varied, interesting, and attractive landscape. This is acknowledged and supported in Chapters 2, 9 and 11 of the CDP. Although provisions for the felling of trees/forests/woodlands falls within the scope of the Forestry Act, Kerry County Council within its own role and responsibilities will seek to protect trees, groups of trees and woodland areas of particular importance due to their biodiversity or visual amenity value. This is further outlined in the Biodiversity Action Plan, Appendix 3, Volume 6. The Tralee MD Tree Management Strategy 2020-2025 sets out the Tralee MD’s approach to managing trees in its care in urban centres so as to maximise their long-term benefit within the built environment. The CDP supports the rolling out of Tree management strategies for all Municipal District in the county. It is envisaged that these strategies will review potential Tree Preservation Orders</p>	<p>No proposed amendments.</p>

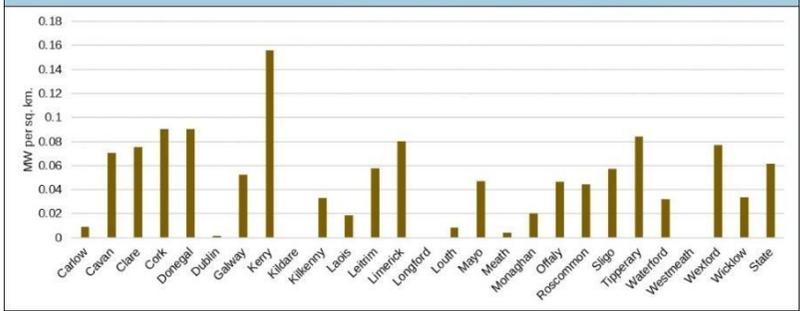
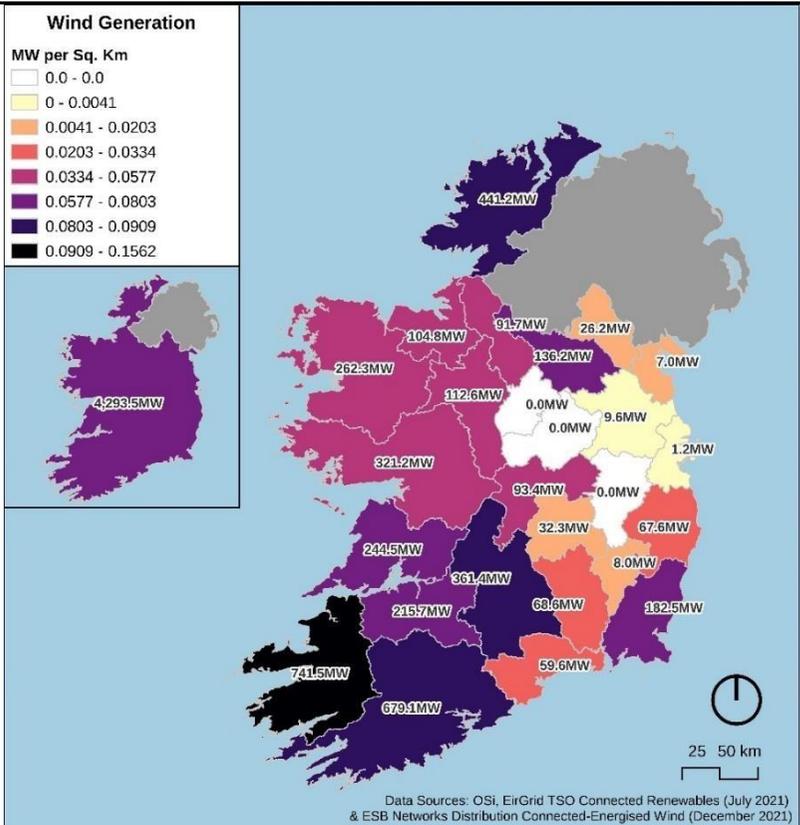
	based on best practices. As regards the creation of woodland see response to KE-C1-346.	
Seeks more emphasis on coastal erosion , with references made to dune systems in various parts of the county and to other coastal layers.	It is an objective of the plan KCDP 11-53 to protect the sand dunes of the County and prohibit any development that would damage the integrity of these areas. The council will also work with local stakeholders and community-based organisations to facilitate and support community led initiatives to protect the coastal areas from erosion.	No proposed amendments.
The Landscape Character Assessment published in 2012 is raised in a number of submissions and the future status of this document is queried	A Landscape Review of the County is included in the Appendices to Volume 1. This process identified and described variations in the character of the landscape. It sought to identify and explain the unique combination of elements and features (characteristics) that make landscapes distinctive. This review informed the identification of Visually Sensitive Areas as included in the Development Plan. The Landscape Character Assessment 2012 has therefore been replaced and does not form any part of the draft plan.	No proposed amendments.
Visually Sensitive Areas , some submissions seek the inclusion of additional areas as visually sensitive along with the designation of more views and prospects . Submissions also wish to seek their lands not to be designated as visually sensitive.	The landscape review of the County Kerry can be found in Volume 1- Appendices. This review includes a process of identifying and describing variations in the landscape. It seeks to identify and explain the unique combination of elements and features (characteristics) and views that make landscapes distinctive. This review informed the identification of visually sensitive landscape included in the plan. Section 11.6.5 of the plan acknowledges that there is a need to protect and conserve these adjoining public roads throughout the County. Any development which hinders or materially affects these views/prospects will not be permitted.	No amendment proposed.

Chapter 12 – Energy		
Key Issues	Response	Recommendations
OPR recognises contribution County Kerry has made under its current plan to the generation of renewable wind energy. However some aspects of the Wind Zoning Methodology lack a clear policy or evidence basis, and have the potential to significantly and unreasonably limit wind energy development when	County Kerry has the largest number of installed wind turbines and installed MW output of all Counties in the state and by far the largest installed MW per Sq. km. To date there are 364 wind turbines in the County with a potential output of 742MW notwithstanding the County’s internationally renowned landscape and approximately 35% of the County’s landmass designated as a SAC/SPA/NHA/pNHA. In addition, permission exists for an additional 42MW which yet to be constructed. If every county in the state generated the same MW of electricity per square kilometer as Kerry, it could add an additional 6,631MW of wind energy to the grid. If Kerry was included on a table of EU countries in an analysis of MW per sq.km then it would be in 3rd largest Country in the EU. See maps and tables below:	Update the Wind Zoning Methodology in Volume 1 Appendices and include additional text in section 12.5.4.1.3 <i>Wind Energy Policy Areas</i> , supportive of community-based wind energy projects.

combined with other environmental and amenity constraints.

The planning authority is required to: **(i) indicate, based on relevant and meaningful metrics, how the development plan will contribute to meeting national targets on renewable energy and climate change mitigation and, in particular, wind energy production and the potential wind energy resource (in megawatts) in the county as required by item (2) of the of the SPPR in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017), and (ii) demonstrate that the draft Plan is consistent with the delivery of part (i), and in particular: (a) re-evaluate the 'Areas for Further Assessment' to provide for a total area where wind zoning development is 'permitted in principle' commensurate with the area of the county, and other areas where wind energy development is open for consideration, ensuring greater correlation between the Wind Zoning Methodology approach and the Landscape Sensitivity Mapping as detailed in the Landscape Review, Appendix 7; and (b)**





If Kerry was included on a table of EU countries in an analysis of MW per sq.km then it would be in 3rd place.

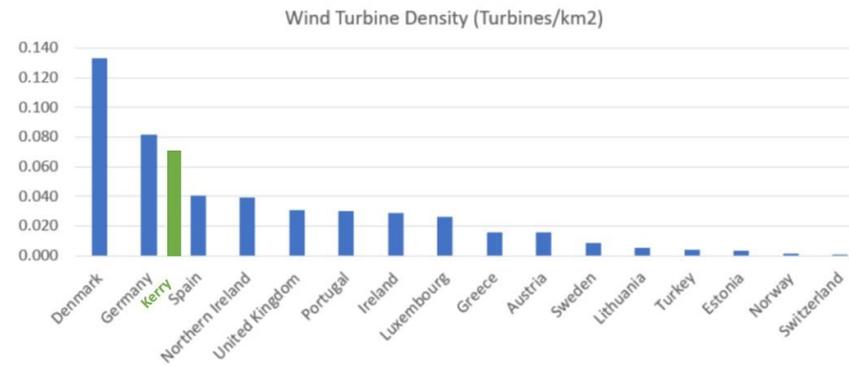


Figure 1: WEI Submission to Draft Kerry County Development Plan 2022-2028 with Kerry added.

As part of the consideration of submissions / observations received including the OPR a review of the draft Wind Zoning Methodology published with the draft plan was undertaken. In addition to removing the 1km setback around settlements under step 2, constraints a review of the remaining Areas for Further Assessment has been undertaken. This assessment has resulted in no additional areas considered suitable to be designated as “Open to Consideration”.

However, the footprint of the areas designated as Open to Consideration have the potential to cater for 201 turbines which could potentially yield 703MW. These figures do not take into account local topographical features or the separation distance from sensitive receptors, however the quantum designated and the associated policy in Chapter 12 indicates that Kerry has and will continue to contribute to meeting national targets on renewable energy and climate change mitigation and, in particular, wind energy production.

In addition to areas designated as open to consideration, it is recommended that suitably scaled community wind energy project may be considered in areas not deemed suitable for commercial wind farm developments. They could be considered in areas outside of those zoned open to consideration or repower areas that are not subject to constraints as identified in the Wind Zoning Methodology. This amendment offers opportunities for community-

based projects (which allow for the profits to be disseminated directly back to the community) to contribute to national wind energy production.

In addition to the amendment above and the areas designated as Open to Consideration, Chapter 12 also contains policies and objectives supportive of other forms of renewable energy. These have significant potential also to contribute to renewable energy and climate change mitigation. It is estimated that the Draft County Development Plan provides the framework for approximately 389MW of additional renewable energy to be generated over the lifetime of the plan from the following sources:

Hydro (6MW)

As is outlined in Table 12.3 of the Draft Kerry County Development Plan 2022-2028 there is limited generating capacity in terms of hydro in the county. In 1985 the Department of Energy published *Small Scale Hydro-Electric Potential of Ireland*. This document identified a number of sites with potential for small scale hydro in Kerry. There are environmental factors that may determine the suitability or not of a site for hydro-electric generation. Notwithstanding these issues, the total potential of the additional sites identified in Kerry is 5.93MW.

Solar (373MW)

Section 12.5.3.3 states that 13 solar farms have been permitted in Kerry. The generating capacity of these permitted solar farms is 137MW. Having regard to these recent applications and the landscape of the County there is potential for at least an additional 200MW of solar energy to be permitted in the County.

There is significant potential for solar PV panels to be provided on existing housing stock, but in particular on the 7,000 housing units necessary over the lifetime of the plan as set out in the Core Strategy. If each of those proposed houses had solar panels installed, it could generate an estimated 15MW.

Between January 2017 and December 2019, approximately 100,000m² of agricultural buildings were permitted in the county as new buildings or as extensions to existing buildings. Over the lifetime of the development plan it is estimated that approximately 200,000m² of agricultural buildings will be permitted. If 50% of these roofs install photovoltaics, they could potentially generate 20.5MW of energy.

	<p><u>Bioenergy</u> (10MW)</p> <p>In terms of bioenergy, suitable agricultural lands that could contribute to same are located in all parts of the County, whether it be sources associated with lands or animals. It is estimated that up to 10MW of electricity, with additional potential for heat generation, could be generated from bioenergy.</p>	
<p>SRA commend Chapter 12 for renewable energy and transit to a low carbon society and economy. Requests a specific objective in support of preparing a Renewable Energy Strategy for the County inclusive of targets across renewable energy sources, including the potential for offshore renewables, bioenergy, solar etc. Support for District Heating Projects</p>	<p>Kerry County Council is cognisant of its role in climate action and facilitating sustainable energy production and this is one of the key themes of the Draft Plan. In relation to the preparation of a RSES, it is considered that the policies and objectives contained in chapter 12 are adequate to guide the development of renewable energy in the County over the lifetime of the plan.</p> <p>The Draft Plan contains two objectives relating to district heating systems [KCDDP 12-5 & 12-28]. These are considered adequate.</p>	No change recommended.
<p>TII request additional objective in relation to renewable energy and in relation to safeguarding the national road network, indicating that grid connection routing options should be developed to safeguard the strategic function of the national road network</p>	<p>In relation to renewable energy and in relation to safeguarding the national road network, it is considered acceptable to include an additional policy and objective regarding grid connection routing options and standards/guidelines for glint and glare assessments.</p>	<p>Include the following in Objective 12-9a - grid connection routing options should be developed to safeguard the strategic function of the national road network in accordance with Government policy by utilising available alternatives and standards/guidelines for glint and glare assessments.</p> <p>Include the following in Objective 12-22a - Applications for Solar Farm developments should be accompanied by glint and glare assessments and such a requirement should be included as a provision of the Development Plan prior to adoption.</p>
<p>Submissions have been received in support of the development of a LNG facility in the county, with other submissions outlining concerns that the Plan is incompatible with national and regional planning strategies regarding</p>	<p>The Council supports the strengthening of the gas network to sustainably service settlements and employment areas in the Region, and to progress development of infrastructure to enable strategic energy projects in the county.</p> <p>RPO 219 in the Regional Spatial Economic strategy for the Southern Regional relates to New Energy Infrastructure. This objective seeks to support the sustainable reinforcement and provision of new energy infrastructure by</p>	No proposed amendments.

<p>its support for the proposed Shannon LNG fracked gas import terminal at Tarbert-Ballylongford Landbank, and the development of gas infrastructure in the county.</p>	<p>infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs. Objective KCDP 12-3 would therefore accord with this RPO.</p> <p>As regards comments on the source of gas, namely fracked gas, it is noted that the gas importation facility referred to in Objective 12-3, does not refer to sources of gas. It would not be within Kerry County Council's remit to address or limit where gas is sourced. This is supported by National policy where the DECC noted in its May 2021 Policy Statement on the Importation of Fracked Gas that the placing of a legal prohibition on the importation of fracked gas in national legislation has been considered and legal advice has been provided by the Attorney General. In the context of European Union Treaties and the laws governing the internal energy market, it is considered that a legal ban on the importation of fracked gas could not be put in place at this time.</p> <p>It is also stated in the Policy Statement on the Importation of Fracked Gas that a review of the security of energy supply of Ireland's electricity and natural gas systems will be carried out by DECC. This review has not yet been concluded but its content will be influenced by current global energy instability. Policies and objectives are included in order to meet climate change targets, security of energy supplies, to promote the development of Energy Hubs/Gas Networks, and to encourage industries etc. to locate in the North Kerry area.</p> <p>Having regard to the above, the PA is satisfied that policy/objectives outlined in this plan enable a sustainable transition to a decarbonised energy system, including the best use of appropriately mature technology at this point in time and into the foreseeable future as determined by European, National and Regional climate action policy.</p> <p>Kerry County Council therefore supports the strengthening of the gas network to sustainably service settlements and employment areas in the Region. Within the framework outlined above, it seeks to progress development of infrastructure to enable strategic energy projects in the county, including the development of a LNG gas importation facility on the Tarbert/Ballylongford Landbank, and the extension of the Gas Network from Listowel into the Kerry Hub and Knowledge Triangle settlements of Tralee, Killarney and Killorglin.</p>	
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<p>Consideration should be given to specifically including support for facilitating technologies, such as anaerobic digestion, that support the circular economy and help reduce emissions from agriculture, providing biofuels to replace fossil fuels, digestate that can be utilised as a fertiliser and increased revenue streams for farmers.</p>	<p>All forms of renewable energy are supported by Objective KCDP 12-12 of the Draft Development Plan. Bioenergy, including anaerobic digestion, is referred to in Section 12.5.4.4.</p>	<p>No proposed amendments.</p>
<p>Submissions encourage Kerry County Council to designate lands in various parts of the county as open-to-consideration. Other submissions state that Kerry should be protected from any further windfarms, with a large number of submissions opposed to wind energy development in the Scartaglin and Duagh areas.</p>	<p>Areas suitable for wind energy have been identified following a comprehensive analysis, the details of which are included in Volume 1, Appendix 6 (Wind Zoning Methodology). This is an evidence-based approach involving a sieve mapping analysis of the key environmental, landscape and technical criteria. This document has been updated in response to the recommendation in the submission from the OPR. As a result of this review of the Wind Zoning Methodology no changes are proposed to the wind zonings in the Draft Plan.</p>	<p>See response to OPR submission.</p>
<p>Submissions seek further clarity on repowering and the extension of existing windfarms.</p>	<p>Generally, wind farm developments are given an operating period as a condition of planning. Some older applications in the county do not have such a condition. Other applications have been given a period 20-25 years with the length of operation now generally standardised 30 years. The reason for this condition is to enable the planning authority to review the operation of the wind farm in light of circumstances then prevailing. Applications for repowering are therefore to be assessed against current policy and guidelines. The issue of repowering is covered in the Draft Revised Wind Energy Development Guidelines 2019.</p>	<p>No proposed amendments.</p>
<p>Concerns raised in relation to Battery Storage systems</p>	<p>It is an objective of the plan (KCDP 12-30) to facilitate the sustainable development of Battery Storage systems in appropriate locations at or adjacent to existing energy infrastructure subject to requirements and considerations in relation environment and health/safety parameters.</p>	<p>No proposed amendments.</p>

	Applications received are subject to rigorous assessment including an assessment by the chief fire officer.	
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Chapter 13 - Water & Waste Management		
Key Issues	Response	Recommendations
<p>Irish Water Submission - all surface water run-off initiatives should be managed via nature-based solutions or alternatively separate storm systems. States that Killarney & Tralee, as well as the five Regional Towns, have headroom or have projects underway to provide additional capacity for WWTP. Fenit upgrade will be completed within the lifetime of the plan period. Drainage Area Plan (DAP) is underway for Killarney & Tralee & due to be completed in 2023. Tralee, and to a lesser extent Killarney, will require network upgrades to cater for these growth targets. Listowel DAP is ongoing and preliminary studies have identified network capacity constraints.</p>	<p>Irish water is the statutory Sanitary authority regarding water supply and waste-water treatment. The Draft Plan has made reference to Sustainable Urban Design Systems (SUDs) and in particular nature-based solutions in the Development Management standards and Guidelines (Vol. 6) and in Chapters 11 and 13. SUDs are required for all new developments. See response to Submission KE-C1-365 which recommends the inclusion of Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Water Sensitive Urban Design Best Practice Interim Guidance Document into plan</p> <p>The Council will work with IW to ensure that the Small Towns and Villages Growth Programme is consistent with the Core Strategy and development of lands. The upgrading work for those settlements listed is a prerequisite for the development with n these settlements.</p> <p>Kerry County Council will continue to engage with Irish Water, to ensure planned growth in the strategic growth areas is taken account in the preparation of the DAP.</p> <p>It is the intention of the Council to prepare a masterplan for the Lohercannon area which contains the Tralee WWTP. IW will be consulted during its preparation, and any development layout will be cognizant of the WWTP. See Chapter 13, specifically Objectives KCDP 13-3, KCDP 13-16, KCDP 13-18 and KCDP 13-25.</p>	<p>No proposed amendments.</p>
<p>Wastewater Treatment Facilities</p> <p>-upgrading the wastewater system in settlements</p> <p>-plan to deliver investment for the provision of treatment plants in settlements throughout the county etc in order to allow for development.</p>	<p>Kerry County Council has identified 24 priority settlements (including Ballinskelligs/Dun Geagan) in urgent need of wastewater infrastructure investment. These 24 settlements form part of a detailed submission made by Kerry County Council to Irish Waters Small Towns and Villages Growth Programme (STVGP). The Council will support and facilitate Irish Water in the sustainable development of rural wastewater treatment programmes and supports the initiatives of Irish Water, communities and developers in small rural settlements to identify solutions subject to available funding for such services. Existing objectives KCDP 13-15 & KCDP 13-16 support and facilitate Irish Water in the sustainable development of rural wastewater treatment programmes and supports the initiatives of Irish Water, communities and</p>	<p>No proposed amendments.</p>

	<p>developers in small rural settlements to identify solutions subject to available funding for such services.</p>	
Water Supply	<p>There is an overarching requirement for the Council to ensure compliance with the Water Framework Directive including aligning population growth/spatial planning with the sustainable management of water supply and waste water treatment in consultation with IW.</p> <p>It is an objective (13-14, 13-15) of the plan to facilitate and support the sustainable provision of new and the upgrading of existing water and water treatment infrastructure within the county.</p> <p>It is the policy of the council to protect all sources and potential sources of public water supply, including their zones of contribution within the County from pollution resulting from any development and/or land use</p>	No proposed amendments.
Group Water scheme -include steps to speed up the process of group water scheme take-overs.	<p>The responsibility for the taking over of Group Water Schemes has transferred to Irish Water since its inception and accordingly Kerry County Council is no longer in a position to take them over. Irish Water has developed a protocol to facilitate the taking over of these schemes. There are currently 508 group water schemes within the County of which 234 have been taken over. The CDP outlines policy in relation to both water and waste water treatment in the county in Chapter 13, Section 13.2.2.1. Existing objectives KCDP 13-15 & KCDP 13-16 support and facilitate Irish Water in the sustainable development of rural wastewater treatment programmes and supports the initiatives of Irish Water, communities and developers in small rural settlements to identify solutions subject to available funding for such services.</p>	No proposed amendments.
Circular Economy	<p>The policies and objectives of the Plan refer to the Circular Economy and the different benefits, including environmental and economic, that arise from applying the concept of the Circular Economy.</p> <p>County Kerry is advancing its development as a circular and bioeconomy where the value of all products, materials and resources is maintained for as long as possible thereby significantly reducing or eliminating waste. Further developing the circular economy will require greater efficiency with raw materials, energy etc by constantly reusing natural resources wherever possible</p> <p>The plan also supports social enterprises and the circular economy within local communities to benefit biodiversity/nature, environmental protection, employment generation and community wellbeing and community development using a whole systems approach</p>	<p>Insert additional text in section 13.3.3. The Council will facilitate the sustainable provision of additional waste facilities at appropriate locations in accordance with the <i>Waste Management Infrastructure Guidance for Siting Waste Management Facilities</i>. This Guidance will be included in the upcoming <i>National Waste Management Plan for a Circular Economy (NWMPCE)</i>, which will replace the <i>Southern Region Waste Management Plan 2015-2021</i> and the regional waste management plans for the other two regions. And include references to the following in Section 13.3.3 & 1.5.4.16(vol6); <i>A New Circular Economy Action Plan for a Cleaner More Competitive Europe</i>; <i>Waste Action Plan for a Circular Economy-Ireland's National Waste Policy 2020-2025</i>; <i>Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects, published in 2021 by Environmental Protection Agency (x2)</i> Add the following principle to Section 3.4; Circular Economy - To transition to a</p>

		Circular Economy which recognises that all resources are scarce, and aims to maintain the value of all products, materials and resources through reuse, renewal and repair, so that products are reused continually, to minimise the generation of waste.
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Chapter 14 - Connectivity		
Key Issues	Response	Recommendations
<p>Modal Share & Sustainable transport [OPR] - the planning authority is requested, in consultation with the NTA (and TII), as appropriate to: (i) consider the inclusion of a modal share target for the county; (ii) provide an effective monitoring regime for the implementation of the planning authority's sustainable transport strategy and the modal share targets in particular; and (iii) commit to the preparation of a Local Transport Plan for Tralee and Killarney in accordance with the requirements of the RSES within a specified period of time following the adoption of the Development Plan.</p>	<p>The comprehensive objectives in the Draft Plan reflect the Council's strong commitment to delivering significant modal shift to sustainable transport modes. The Plan aims to integrate land use and transport planning and deliver liveable towns as a key climate action measure. Irrespective of specific targets, there is a need to increase the uptake of sustainable transport as much as possible. The Council will also seek to monitor any progress that is made in this regard as comprehensively as possible. Given the recent investment in new active travel infrastructure and proposed green/blueways there is a strong emphasis on connectivity, green infrastructure and sustainable transport throughout the plan.</p> <p>There are a range of policies and objectives [KCDP 14-8 - 14-22] in the Plan to achieve modal shift that are applicable to rural and urban areas. It is recognised however that both the public transport offering, and active travel infrastructure provision is weaker in rural areas. The Plan supports the Local Link programme and it is also proposed to amend the Plan to include reference to Connecting Ireland Rural Mobility Plan developed by the NTA. A key focus of the Plan is also reducing the need to travel, or the distance travelled, in the first instance (the 'Avoid' element of the ASI framework) and this is supported in the Plan through revision of the settlement hierarchy, compact growth approach to development, support for remote working and provision of Digital Hubs is given in Chapter 9 Economy Development of the Plan. The Local Authority will continue to monitor travel patterns through use of Census POWSCAR data, and a commitment is given in the Plan to exploring other data sources including the generation of additional primary transport data. It will also monitor use of digital/remote working hubs. It is intended that the Local Authority will consult with the NTA with a view to scoping additional travel pattern profiling. This will assist monitoring of modal shift in rural areas. While specific targets for modal shift in rural areas have not been set out in the Plan, this does not preclude promoting modal shift as much as possible, through implementation of the objectives of the plan, and monitoring the extent of modal shift achieved.</p> <p>The Council is committed to continued co-operation with the NTA for the purpose of developing further analysis in relation to modal shift across the</p>	<p>Amend KCDP 14-45 – Facilitate the development and expansion of the Local Link Rural Transport Programme and support Connecting Ireland Rural Mobility Plan by the National Transport Authority (NTA).</p>

<p>Strengthening of Connectivity Objectives [SRA] - It states that the Draft Plan should set a high-level ambition and target for modal change, informed by the Draft Plan's inclusion of existing mobility trends in the County, which can be further supported and defined through a County Transport Strategy, Local Area Plans and Local Transport Plans in coordination with stakeholders.</p>	<p>county and in deriving a realistic modal change target for Kerry and as such, a policy to this extent should be included as part of the Plan.</p> <p>The Department of Transport's 'Smarter Travel: A Sustainable Transport Future, A New Transport Policy for Ireland 2009-2020', set mode share targets for work related commuting – targets which are reflected in the Regional, Spatial and Economic Strategy for the Southern Region (RSES). This is referred to in KCDP 14-3 which states support for this policy initiatives as well as the "National Cycle Policy Framework" and any future national sustainable mobility policy.</p> <p>There is an objective [KCDP 14-22] in the Draft Plan to develop Local Transport Plans for the key towns of Tralee, Killarney and Listowel. These will look at transport at a more local level which may inform further refinement of specific mode share targets. It may also take a broader overview and look at transport for all purposes, including social and educational purposes. It is intended that the Council will consult with the NTA with a view to scoping additional travel pattern profiling.</p> <p>Objective 14-6 seeks to "Set modal share targets within the county in cooperation with the NTA, CARO, SRA and other relevant stakeholders and in accordance with any relevant Guidelines that may come into effect."</p>	
<p>National Roads [TII]-welcomes alignment of Plan concerning access to national roads with Government policy.</p>	<p>The Principles of the Core Strategy (Section 3.4) support the development of a safer, more efficient, effective, and connected transport system within County Kerry.</p> <p>All proposals for development onto the national roads will be assessed in accordance with the provisions of the DoECLG Guidelines.</p> <p>Reference to Transport and Mobility Plans identified in the respective Town (Draft) plans for Tralee, Killarney and Listowel (Objectives TR98, KA73 and LIS85) will be amended to align with Objective 14-22 and reference Local Transport Plans.</p>	<p>No proposed amendments</p>
<p>Rural Housing -Allow access onto National Roads for the provision of dwellings for local people</p>	<p>The policy relating to Access onto National Roads has been drafted in accordance with National Policy which has been set out in the Spatial Planning and National Roads Planning Guidelines (DoECLG January 2012). These guidelines state that planning authorities must avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 km/h apply. This provision applies to all categories of</p>	<p>No proposed amendments</p>

	development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.	
Clarity on preparation of Local Transport Plans	There is an objective [KCDP 14-22] in the Draft Plan to develop Local Transport Plans for the key towns of Tralee, Killarney and Listowel. These will look at transport at a more local level which may inform further refinement of specific mode share targets. It may also take a broader overview and look at transport for all purposes, including social and educational purposes. The Council will engage with all stakeholders regarding the preparation of these LTPs.	Amend KCDP 14-22 –Prepare Local Transport Plans for the Key Towns and other settlements where appropriate, which shall be aligned to and integrated with relevant Local Area Plans, within two years of adoption of the plan
Promote & facilitate Sustainable Modes of Transport	It is the policy of the plan to promote a more cycle/walking friendly environment through the provision of improved cycling infrastructure, and to facilitate the sustainable development of a cycling network strategy for the county. Greater investment in cycling and pedestrian infrastructure may result in an increased number of children walking and cycling to school. It is policy of the plan to facilitate the sustainable creation of additional walks, linkages, and cycleways in the towns to promote a more pedestrian & cycle friendly environment. There are several objectives which promote active travel and sustainable infrastructure for the County such as KCDP 14-41 Promote the sustainable delivery of a reliable, integrated, low-carbon and cost-effective public transport system for the County.	Amend KCDP 14-41 Promote and proactively support the sustainable delivery of a reliable, integrated, low-carbon and cost-effective public transport system for the County”.
Public Transport & Local Link	Chapter 14 contains a number of policies and objectives to facilitate the expansion of bus routes including options for the local link Rural Transport Programme and also associated bus infrastructure namely bus stops/shelters etc.	No proposed amendments.
Active Travel should be promoted and implemented	Chapter 14 contains a number of policies and objectives to support active travel measures throughout the county, see section 14.3.3 active travel objectives KCDP 14-8, 14-9, 14-10, 14-15.	
Kerry Airport viewed as a Transport Hub	The Draft Plan recognizes the importance of Kerry Airport as a key transport link and economic driver for the county and the region Chapter 14 a number of policies which relate to supporting and enhancing Kerry Airport.	No proposed amendments.
Greenways -there should be a plan for linking of the greenways	Greenways are specifically addressed in Chapters 10 & 14 of the draft plan. The Council has developed a Greenway Strategy for the future development of routes throughout the county and has outlined a number of greenways which the council intends to roll out in a coordinated manner subject to funding and the necessary statutory consents. In addition, it is an objective under KCDP 10.40 to support and facilitate the development of new greenways. Please note that the Map 14.1 on page 244 indicates indicative	No proposed amendments.

	routes only and those identified are not an exhaustive list of planned greenways.	
<p>Digital Connectivity</p> <p>- greater broadband provision -more digital hubs</p> <p>- general public should be protected from intrusive masts</p>	<p>It is an objective of the plan KCDP 14-65 to facilitate the sustainable delivery of high-speed, high-capacity digital and mobile infrastructure and support the continued investment and the delivery of ICT infrastructure, broadband networks and digital broadcasting in the County in line with the National Broadband Plan for Ireland. The council will work with all stakeholders to deliver upon this. Kerry County Council is currently preparing a new digital strategy for the county. The strategy will be a key vision, opportunities and objectives document to developing business, skills, communities and capacity in the County to avail of digital technologies underpinned by the National Broadband Plan. There will be a proposed 12 Broadband Connection Points (BCPs) spread throughout the county.</p> <p>The council recognises that efficient telecommunications and broadband are central to the development of a knowledge-based economy throughout the Country. In considering locations for masts and other infrastructure requirements, Kerry County Council will have regard to the 'Telecommunications Antennae and Support Structures Guidelines for Planning Authorities' (DoECLG, 1996) and Circular Letter PL07/12.</p> <p>Under Class 31 Planning & Development Regulations 2001 (as amended) the provision of telecommunication services (including poles, antennae etc) are considered exempt development subject to conditions and limitations.</p> <p>The Council also recognises that a balance needs to be struck between efficient telecommunications and broadband services and possible effects on the residential and visual amenities of an area.</p>	<p>No proposed amendments.</p> <p>In addition to the development management standards included in section 1.14 (vol 6) it is considered prudent to include additional text in s1.14.1 (vol 6) and objectives in s14.9 as follows;</p> <ul style="list-style-type: none"> • Every effort should be made to locate new telecommunication masts in existing compounds or adjacent to existing masts. • When locating on greenfield sites the mast should be away from existing residential properties. • The preferred location for masts and antennae is in industrial estates, attached to industrial buildings or other commercial buildings <p>New objectives</p> <p>KCDP 14 - Achieve a balance between facilitating the provision of telecommunication infrastructure in the interests of social and economic progress and sustaining residential amenity and environmental quality.</p> <p>KCDP 14- Ensure that the location and provision of telecommunication infrastructure should minimise and/or mitigate any adverse impacts on communities, public rights of way and the natural environment.</p>
Improvements should be made to Piers and Harbours in terms of access, signage and facilities.	<p>It is the policy of the council to facilitate the upgrading of piers and harbours around the county in order for them to reach their full potential for economic and recreational use. To date the council have applied for funding to carry out improvement works at 4 no. locations, these include Fenit, Knightstown, Scraggane (Maharees) and Kilmackalogue, it is envisaged that the council will apply for further funding as opportunities become available.</p> <p>Submissions for individual piers should be included in the Local Area Plans.</p>	No proposed amendments.
Requests more car parking	<p>The Council are currently preparing a Parking Strategy for the county. Key Challenges to be addressed in this strategy include promoting town centre regeneration and a model shift in transport whilst meeting business needs, making Town Centres more accessible, meeting targets for electric vehicle</p>	No proposed amendments.

	charging points and improving parking infrastructure for key Tourism sites/routes.	
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Volume 1 - Appendices - Appendix 6 – Wind Zoning Methodology		
Key Issues	Response	Recommendations
no updated Wind Energy Guidelines since 2006	Draft Revised Wind Energy Development Guidelines were published in 2019. and have been used to inform wind energy policy in the Draft County Development Plan.	No proposed amendments.
too many Wind Farm Developments construction of wind turbines on peatlands can result in the destruction of the peat soil	The level of wind farm development in the county has been acknowledged in chapter 12 and in the Wind Zoning Methodology contained in the appendices to Volume 1. The cumulative impact of this existing development has been considered in the Methodology. Area's suitable for wind energy have been identified following a comprehensive analysis, the details of which are included in volume 1, Appendix 6 (Wind Zoning Methodology). This is an evidence-based approach involving a sieve mapping analysis of the key environmental, landscape and technical criteria.	

Volume 2 – Town Development Plans - Tralee		
Key Issues	Response	Recommendations
10-Minute Town concept should be promoted and implemented	The Council acknowledges the need to increase the town's permeability and accessibility to alternative and more sustainable modes of transport. Therefore, this plan facilitates the transition of Tralee to become an exemplar of the 10-minute town concept advocated by the RSES (Accessibility & Framework Report 2020) (RPO 176). It is an objective to promote and attain sustainable compact settlements with the "10-minute" town concepts, whereby, a range of community facilities and services are accessible in short walking and cycle timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services.	No proposed amendments.

<p>Sustainable Growth seeks the development of a Strategic Growth Plan for Tralee, which must be aided by strategic investment into Tralee to not only meet the target of 30% growth, but out-perform these goals</p>	<p>The Draft Plan contains policy objectives for Tralee grow by 30% by 2040 Chapter 3 sets out a growth target of 2,663 including the development of 2,087 residential units by 2028. Objective TR 14 sets out to monitor the scale, rate and location of newly permitted development and apply appropriate development management measures in order to ensure compliance with the Settlement Hierarchy. There are adequate well-located zoned and serviced lands to cater for the anticipated increase in population.</p>	<p>No proposed amendments.</p>
<p>Town Centres Regeneration of Pembroke Street, Edward Street, Castle Street and Boherbue must also be included in the Public Realm Strategy.</p> <p>Vacant properties and lands currently lying idle in the urban core should be earmarked and prioritised for significant redevelopment</p>	<p>The Public Realm Strategy for Tralee is centred around the creation of a clear sense of identity for Tralee, a highly attractive place to live, work, study and visit with the continuation of transformative urban regeneration and public realm spaces. The scale of the intervention will be guided by the available funding from time to time. The areas listed in the plan reflect the areas for which funding has been allocated in principle under Phase 3 of the public realm works funded through the URDF, Smarter Travel, and significant local resources. It is proposed to continue to rollout these improvements as resources become available. The development of the Destination Town brief will benefit orientation throughout the town, providing clear visual linkages through signage and related means.</p> <p>Significant transformative works have been undertaken in Tralee over the past five years with major investment in the Island of Geese, the Mall, Bridge St, Russell St, Lr Rock St, Denny St. These works have been to a scale and quality unprecedented in the town.</p> <p>The Draft Plan contains objectives and strong policy commitments to the regeneration and renewal of all towns and villages in the County. The plan also contains a range of site activation measures and initiatives to encourage same. In relation to Upper & Lower Castle Street in Tralee Town, Kerry County Council has developed a Pilot Shopfront Enhancement Grant Scheme [See Section 1.4.2.2] aimed at supporting the vitality and viability of the Town Centre</p> <p>The Draft Plan promotes and supports the redevelopment of upper floors for residential use, including student accommodation, and will consider flexible application of development management standards where appropriate in order to facilitate this type of development, such as a reduction in open space and car parking standards, which is set out in Section 1.4.2.1.</p>	<p>No proposed amendments.</p>

Preparation of a Retail strategy/ retail core	The retail control zone no longer forms part of the planning policy framework for Tralee. The Draft Plan proposes to undertake a retail strategy for Tralee as part of the countywide retail strategy (Objective TR 45). The Plan also proposes to restrict further retail development in the Manor West and Manor East areas to retail warehousing only as defined in the Guidelines for Planning Authorities, Retail Guidelines, DoECLG, 2012 (Objective TR 46). Where proposed the need for any additional retail warehousing in this area should be carefully assessed in view of the significant levels of provision already established there and potential impacts on vitality and viability of the town centre. The council will take into consideration any potential alternate office, community, culture and residential uses for vacated ground floor premises no longer fit for modern retail purposes.it is the policy of the plan to encourage the occupation of vacant premises.	No proposed amendments.
Land Use Zoning	Several submissions propose zoning changes within Tralee Town Boundary. There is adequate land zoned to cater for Tralee’s anticipated growth over the lifetime of the plan. The planning policy framework for Tralee will be reviewed as part of the forthcoming review of the LAP’s and individual land use zonings will be reviewed as part of this process	No proposed amendments.
Flooding Issues	Some submissions raise the issue of flooding within Tralee Town. See response to the OPW submission [KE-C1-130]	

Volume 2 – Town Development Plans – Killarney		
Key Issues	Response	Recommendations
A submission seeks a change to KA 16, "Protect and improve air quality in the Town, especially in relation to reducing particulate matter", to "Protect, improve, monitor, and publicize the air quality in the Town, especially in relation to reducing particulate matter".	Objective KA 16 seeks to protect and improve air quality in the Town, especially in relation to reducing particulate matter. Killarney town and its environs have been designated a “low smoke zone” thereby reducing emissions and particles. The monitoring of air quality is carried out by the EPA.	No proposed amendments.
A submission recommends a re-purpose of St Finian’s Killarney from a proposed residential care home to use by a higher-level educational use.	St Finian’s is outlined in the Town Plan as having the development potential for “Significant mixed-use development, including a cultural/tourist use. Development on the site should incorporate a strong social and community element which reflects the historic use of the site. Potential residential use”, this does not preclude the use of the site for higher level educational use.	No proposed amendments.

<p>A submission seeks the inclusion of an additional Objective on the biosphere, given the significant value as a UNESCO Biosphere Reserve, as well as being part of both a Special Area of Conservation and a Special Protected Area and a tourist attraction and recreational amenity.</p>	<p>The Plan contains an Objective KA 19 which states “Maintain and conserve the conservation value of the Killarney National Park as a European site (365 and 4038), a National Park and a UNESCO Biosphere Reserve and the Rivers Flesk and Deenagh (part of a candidate Special Area of Conservation (cSAC)) during the lifetime of this plan and to ensure a screening determination for an Appropriate Assessment is carried out where development projects are likely to have significant effects on this European site whether within or outside the boundary of the European site”.</p>	<p>No proposed amendments.</p>
<p>A number of submissions deal with various land use zonings in the town, in relation to residential lands, lands for tourism, and for landscape protection. A submission also refers to the indicative road over the River Flesk.</p>	<p>Several submissions propose zoning changes within Killarney Town Boundary. There is adequate land zoned to cater for Killarney’s anticipated growth over the lifetime of the plan. The planning policy framework for Killarney will be reviewed as part of the forthcoming review of the LAP’s and individual land use zonings will be reviewed as part of this process</p>	<p>It is recommended that a change to the zoning map is made in relation to a site of Port Road [from S3 to R1] and that indicative roads on the maps are shown as an indicative broken line. (This was due to an inadvertent drafting error with the mapping associated with the draft plan.</p>

Volume 2 – Town Development Plans – Listowel		
Key Issues	Response	Recommendations
<p>Development of Tourism and Retail Facilities in Listowel Town and for the North Kerry Area.</p>	<p>There are several objectives in the Draft Plan which relate to Tourism and Retail in Listowel and North Kerry. The Plan acknowledges the contribution that North Kerry makes to the tourism offering in the county and this will be built upon further with the recently allocated RRDF for Listowel. Section 3.8 of the Town Plan sets out aims and objectives for tourism development in Listowel, including Objective LIS 49 to LIS 57. Section 3.6 of the Town Plan relates to retail within the town and sets out Objectives LIS 37 to LIS 41.</p>	<p>No proposed amendments.</p>
<p>Concerns and objections to a proposed blueway along the River Feale.</p>	<p>Kerry County Council recognises the potential of creating a “blueway” in the River Feale at Listowel having regard to the environment designations in the area. As such it is supportive of a feasibility study for the development of the River Feale Blueway and how this would be linked to the Greenways incorporating a Trail head at the designated Outdoor Facility Hub. The Blueway and associated infrastructure projects will be required to demonstrate compatibility with the conservation objectives of the Lower River Shannon SAC (within which the River Feale is located) and all other stakeholders.</p>	<p>No proposed amendments.</p>

Submissions seek continued investment in public realm improvements particularly in Listowel Town Centre and our surrounding villages.	Improvements to the public realm of Listowel is a key priority of the Town Plan. There are other in the Plan to support this including: LIS 7 and LIS 25, which relate to the preparation of a Town Centre Renewal Action Plan and create a Public Realm Plan.	No proposed amendments.
Identified opportunity sites (The Mart and Castleinch) should be developed in a sustainable way and should take into account Listowel's status as a Heritage Town.	A masterplan for the Castleinch lands will be prepared to set out a framework for its future sustainable development, as outlined in Objective LIS 36 of the Draft Plan.	No proposed amendments.
Flooding Issues	Some submissions raise the issue of flooding within Listowel. See response to the OPW submission [KE-C1-130]	
There are a number of submissions relating to the zoning of lands within the town, these relate to residential and other types of zoning.	Several submissions propose zoning changes within Listowel Town Boundary. There is adequate land zoned to cater for Listowel's anticipated growth over the lifetime of the plan. The planning policy framework for Listowel will be reviewed as part of the forthcoming review of the LAP's and individual land use zonings will be reviewed as part of this process. The planning process framework was recently reviewed (in 2020) and will be reviewed as part of the cyclical review process of the LAP's	No proposed amendments.

Volume 3 – Heritage		
1. List of Public Rights of Way 2. National Monuments & Registered Monuments 3. Record of Protected Structures -Proposed additions and Deletions 4. ACAs		
List of Public Rights of Way		
Key Issues	Response	Recommendations
Proposals put forward to include ROWs, to remove ROWs and for support for inclusion of ROWs.	<p>As per Section 10(2)(o) of the Planning & Development Act 2000 (as amended) a development plan shall include objectives for the preservation of public rights of way which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility, which public rights of way shall be identified both by marking them on at least one of the maps forming part of the development plan and by indicating their location on a list appended to the development plan.</p> <p>It should be noted That omission of a right of way from the development plan does not indicate that a public right of way doesn't exist. Similarly, the inclusion of a route in the plan does not create a right of way.</p>	An extensive list of public rights of way which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility, has been set out in the Main Report.

Record of Protected Structures - Deletions		
Seeks the retention of NIAH 21300506 RPS5-6	By virtue of its dilapidated condition, it is recommended that the structure is removed from the RPS.	See Amendments to Draft CDP Additions & Deletions doc.
Requests that RPS KY 043-028 known as Flahive's Bar, Strand Street, Dingle is removed	The front building has been significantly altered over the past years. The ACA designation ensures that the architectural heritage of Strand Street will continue to be protected following its removal from Kerry County Council's Record of Protected Structures.	It is proposed to delete this structure – see Amendments to Draft CDP Additions & Deletions doc.
requests removal of the house known as "Allens", Lahesrough North, Ballybunion. NIAH 21300506 RPS 5-6	It is proposed to delete this structure due to its dilapidated condition and it is recommended that the structure be removed from the RPS.	See Amendments to Draft CDP Additions & Deletions doc.
Record of Protected Structures - Additions		
requests that a walled structure at Foileye Pier, Kells and an EIRE sign in Roads is included	It is proposed to add the remaining Look Out Posts and EIRE signs to the RPS.	See Amendments to Draft CDP Additions & Deletions doc.
ACAs		
requests that Iveragh Terrace, Waterville Cable Station is considered for inclusion as an ACA	It states that the cable station offices adjacent to Iveragh Terrace and 7,8,9 Iveragh Terrace are already protected structures.	It is proposed to include this as an ACA , see Appendix for more details.

Volume 4 - Tarbert – Ballylongford Landbank		
[OPR] Tarbert Bay pNHA Having regard to the Nature Impact Report and the SEA Environmental Report, the planning authority is required to omit the inclusion of that section of the Tarbert Bay pNHA within the area proposed to be zoned for Employment and Enterprise use within the Tarbert-Ballylongford landbank.	The draft plan proposed to extend the Tarbert Ballylongford landbank in an easterly direction. As part of this, it was proposed to include an area delineated as a proposed Natural Heritage Area within the landbank. It is noted that the Natura Impact Report undertaken as part of the plan making process recommends removal of this land from the proposed extension. The OPR submission supports this recommendation.	It is recommended that the lands contained within the Tarbert Bay pNHA, identified in the appendix to be removed from the Tarbert Ballylongford landbank maps contained in Volume 4 of the plan. In addition, the stated area of the landbank as outlined in S9.6.1 of Volume 1 should be reduced accordingly. The map has also been amended to reflect the archaeological/historical significance of Fort Shannon and an archaeological monument (KE003-001, bastioned fort) between the NORA tanks and the aforementioned pNHA. This sees a reduction in the overall land area of the landbank of 6.4 hectares.

Volume 5 – Environmental Reports		
1. Strategic Environmental Assessment (SEA) 2. Natura Impact Report (NIR)		
<p>[OPR] the OPR considers that the findings of the SFRA could be better integrated into the SEA and that a number of measures, requirements and mitigation measures detailed in the SFRA should be fully incorporated into the draft Plan, in particular with respect to flooding arising from the Justification Test in relation to land zoned for a development purpose in the towns of Tralee, Killarney and Listowel.</p>	<p>It is proposed to include flooding into the SEA ER in a more integrated manner and further to other comments made in relation to flooding made by the OPW.</p>	<p>Environmental Report to be amended in line with OPW and OPR submission, specifically within Section 1.6, Section 5 and the relevant zonings proposed in the three town development plans.</p>

Volume 6 – Other Documents		
Development Management Standards & Guidelines		
<p>OPR - In accordance with section 10(2A)(a) of the Planning and Development Act 2000, as amended, and having regard to NPO 3, 6, 13 and 35 the planning authority is requested to: (i) review the car parking standards promoted in the draft Plan to ensure that appropriate maximum standards are included for both residential and commercial developments in urban areas in accordance with RPO 151; and provide flexibility in the application of minimum separation</p>	<p>In relation to car parking, it should be noted that the Draft Plan supports a reduced car parking requirement in town centres, in order to encourage the establishment and the expansion of small businesses in these towns. There is also a commitment to allow for the reduction in car parking standards in suitable town centre locations in order to encourage a modal shift away from the private car to more sustainable forms of transport, such as public transport, cycling and walking. There is also provision for reduced development management standards [including car parking] for the renovation and reuse of buildings. In particular Table 4 of the Development Management Standards illustrates the car parking standards for different types of development. It sets out that there is generally no car parking provision for developments within the retail core areas of Tralee, Killarney and Listowel. It is acknowledged that overall, the Table does not state if these are maximum or minimum standards and, as such, it is considered appropriate to update the Development Management Standards Table 4 to reflect 'Maximum' car parking standards. The following sentence "It should be noted that a flexible approach to these standards may be applied where</p>	<p>Amend wording of Section 1.5.4.6 Private Open Space</p> <ul style="list-style-type: none"> All houses should have an area of private open space of a suitable gradient, exclusive of car parking, to the rear of the building line. The minimum area of private open space to be provided shall be in accordance with Table 1 for all new residential units. The prescribed private amenity space will allow for a private amenity area, which can accommodate the storage of bins/garden shed etc, and the provision of an area for vegetable growing, etc. In certain circumstances, the standards may be reduced for smaller houses if the Planning Authority considers the space proposed usable in terms of its orientation and shape for example. Reduced quantum may be considered in respect of well-designed high-quality development where it can be demonstrated by the applicant that the space is usable, appropriately located & shaped and of high quality.

distances between opposing windows, minimum private open space provision for houses, and the site coverage standard for urban areas and, where appropriate, and allow for individual development proposals to be assessed on performance based criteria that seek to achieve well-designed high quality development.

such a case is substantiated, there is no traffic safety issue, and it is clearly demonstrated to the Planning Authority in the interest of proper planning and development, that the standard should be adjusted to facilitate the site-specific context” will remain within the Draft Plan.

In relation to the request to provide flexibility in the application of minimum separation distances between opposing windows the provisions of NPO 13 is noted. NPO 13 as set out in the National Planning Framework (NPF) states: In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

In this regard Section 1.5.4.10 of the draft Plan states the following: Between directly opposing above ground floor windows (first floor), a separation distance of 22 metres should generally be observed for new, reciprocal overlooking housing, although this will also be informed by considerations such as typography, design, and housing type and mix. Innovative dwelling types, such as houses which have their main sleeping and living areas on one side, and circulation and bathrooms on the other, may allow for a reduction in this standard. Any window proposed at ground floor level should not be less than 1m from the boundary it faces. Adequate separation distances, between directly opposing rear first floor windows, should be provided when extending existing dwellings at first floor level, to ensure the retention of adjoining residential amenity. For single storey dwellings, a reduction in the rear garden depth may be considered, subject to the protection of adjoining residential amenity. A minimum of 2.2 meters shall be provided between the side walls of detached, semi-detached and end of terrace dwellings to ensure privacy and ease of access.

It is not considered that the provisions set out by the NPF [NPO13] are overly onerous and merely set a benchmark from which a proposal can be developed from, and in light of this it is considered that the wording of Section 1.5.4.10 of the draft Plan should be amended to state:

Between directly opposing above ground floor windows (first floor), a separation distance of **approximately** 22 metres should generally be

- It should be noted that housing developments which provide private open space at the minimum standard throughout the scheme will be discouraged.

No. of bedrooms	Minimum Private Open Space
1 – 2 bedroom*	50 sqm
3 bedroom	60 sqm
4 bedroom (or more)	75 sqm
*Reduced quantum may be considered in respect of housing for older people/ sheltered housing etc.	

Table 1: Minimum Private Open Space Requirements for Dwelling Units

Section 1.5.4.8 of the Draft Plan relates to Maximum Site Coverage and it is acknowledged that this could be more flexible in order to promote and accommodate compact growth. Therefore, it is proposed to insert additional wording in this section as follows:

Site Coverage is determined by dividing the total area of ground covered by buildings, by the total ground area within the site (i.e. footprint of development/Area of site). A maximum of 85%, or up to the existing site coverage (brownfield sites) will be allowed for urban areas, **where it can be demonstrated that there would be no neighbouring impacts such as loss of light, overshadowing or overlooking a greater site coverage % may be considered in an urban context,** and 65% site coverage other areas in rural areas ('one-off' housing).

In relation to the point raised on Minimum driveway length of 6m to be maintained where appropriate in all cases where dwellings are being extended (Section 1.5.6.1), the OPR request that individual development proposals be assessed on performance-based criteria that seek to achieve well-designed high-quality development and the council see the merits in this and therefore additional wording will be added as follows: A minimum driveway length of ~~6 m~~ should be maintained ~~where appropriate~~ **to the site context.**

	<p>observed for new, reciprocal overlooking housing, although this will also be informed by considerations such as typography, design, and housing type and mix, <i>and therefore a reduction may be appropriate whereby the applicant can show that there is no adverse impact on existing or future occupiers in terms of overshadowing, loss of light, or overlooking.</i></p> <p>In relation to the request to provide flexibility in relation to the minimum private open space provision for houses, it is acknowledged that a reduction in the requirements may be appropriate in well-designed high-quality development. The Draft Plan currently states, “In certain circumstances, the standards may be reduced for smaller houses if the Planning Authority considers the space proposed usable in terms of its orientation and shape for example”. It is acknowledged that this could be more flexible and therefore, it is proposed to insert the following wording in Section 1.5.4.6 Private Open Space.</p> <p><i>Reduced quantum may be considered in respect of well-designed high-quality development where it can be demonstrated by the applicant that the space is usable, appropriately located & shaped and of high quality.</i></p>	
<p>Submissions received in relation to lighting proposals, parking, deliveries and access for postal facilities, retail cap of 50sqm, Dependent Relative Accommodation, convenience retail car parking standards, limit radius for objections to planning applications.</p>	<p>The Main Report provides full details of all the suggested changes to the Development Management Standards/Guidelines</p>	<p>Any suggested wording changes are set out in the Main Report.</p>