



Chief Executive's Report on Draft Plan Public Consultation Draft Kerry County Development Plan 2022-2028



Planning Policy Unit
Kerry County Council
14th April 2022

Executive Summary on the Draft Plan Public Consultation

Chief Executive's Report

Part 1 Introduction and Legal Context

Part 2 Statutory Bodies, Summary of submissions made by the Office of the Planning Regulator (OPR), Southern Regional Assembly (SRA) and the other Statutory Bodies and the Chief Executive's Opinion and Recommendations on submissions received.

Part 3 Summary of all submissions, main issues raised, Chief Executive's Opinion on Issues Raised and Chief Executive's Policy Recommendations, List of Submissions received.

Appendix

1. Revised Core Strategy Map
2. Revised Core Strategy Table
3. Revised Rural Area Type Map
4. Revised Settlement Capacity Audit
5. Revised Flood Risk Maps – a. Tralee b. Killarney c. Listowel
6. Map; Mineral & Aggregates Deposits in the County
7. Map; Tralee Landuse zoning & environs
8. Map; Killarney Landuse zoning & environs
9. Map; Amend zoning from R1 (proposed residential) to P1 (agriculture) in Ballyard, Tralee
10. Map; revised zoning maps for Tarbert Island & Fort Shannon
11. Map; Revised Views & Prospects (Waterville)
12. Map; Amend zoning from S3 (Community Facilities) to R1 (Proposed Residential) in Killarney
13. Land Use Zoning
14. Additional ACA (Waterville)
15. Additions/Deletions to Record of Protected Structures
16. Wind Zoning Methodology

Part 1 Introduction and Legal Context

Pursuant to Section 12 of the Planning and Development Act 2000 (as amended), notice of the preparation of the Draft Kerry County Development Plan 2022-2028 was given on 15th March 2021.

Submissions or observations with regard to the Draft Plan and Environmental Reports [Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA)] were invited for a period of just over 10 weeks from 6th December 2021 to the 23rd of February 2022 inclusive, in writing or online on the Council's submission portal. The notices included details of the display of the Draft Plan together with the dates and times of public information webinars and the availability of Council staff for further consultation. In accordance with the requirements of Section 12(4)(b) of the Planning and Development Act 2000 (as amended), this Chief Executive's Report summarises and details the outcome of the public consultation programme on the Draft County Development Plan and provides recommendations as follows:

- Lists the persons or bodies who made submissions or observations on the Draft Plan.
- Summarises the issues raised under the submissions or observations received during the consultation period from all persons and bodies. This includes the issues raised and recommendations made by the Office of the Planning Regulator and Southern Regional Assembly and other statutory bodies.
- Gives the response of the Chief Executive to the issues raised and recommendations made, taking account of:
 - any directions of the members of the authority regarding the preparation of the Draft Development Plan,
 - the proper planning and sustainable development of the area,
 - the statutory obligations of the local authority and any relevant policies or objectives of the Government or of any Minister of the Government,
 - and any observations made by the Minister for Arts, Heritage, Gaeltacht and the Islands relating to any addition to or deletion from the Record of Protected Structures.

This Chief Executive's Report on the Draft Plan consultation is hereby submitted to the members of the Local Authority for their consideration. The elected members have up to 12 weeks to consider this Chief Executive's Report (plus 9 extra days to account for the Christmas period). A special planning meeting of Kerry County Council will take place in April 2022 to decide whether to adopt or amend the Draft Plan.

Strategic Environmental Assessment (SEA)

A Draft Environmental Report accompanies the Draft County Development Plan 2022-2028. The Draft Environmental Report contains a detailed analysis of the Draft County Development Plan 2022-2028 and how the implementation of the Plan would impact on its receiving environment. The Chief Executive's recommendations as set out in this report (including recommendations on the Environmental Authorities submissions) have been assessed to determine whether they would have any significant impact on the environment. Taking into account the mitigation measures which have already been integrated into the Draft Plan, it was considered that the amendments proposed on foot of recommendations in this Chief Executive's Report would not have any significant adverse effect on the environment. Any proposed material amendments will subsequently also be screened for the need to undertake SEA. The findings of this screening exercise together with, if required, a full SEA will accompany any proposed material amendments that go on public display following consideration of the Draft Plan and this Chief Executive's Report.

Appropriate Assessment

In accordance with requirements under EU Habitats Directive (92/43/EEC) and Section 177 of the Planning and Development Act 2000(as amended), amendments proposed on foot of this Chief Executive's Report have been screened to assess whether they would have a significant effect on one or more Natura 2000 sites. It was considered that the amendments proposed on foot of the recommendations, alone and in combination with other plans and projects including the Draft Plan, would not have any significant effect on any Natura 2000 sites.

Overview of the Consultation

A significant amount of public consultation was undertaken in very challenging circumstances due to the covid-19 restrictions

Development Plan Review Process and Indicative Timeline	
Publication of Council's intention to review County Development Plan – initial phase of Public Consultation (Strategic Issues Paper prepared in consultation with Elected Members)	June 2020
Presentation of Chief Executive's Report on submissions received during initial phase of Public Consultation	March 2021
Direction from Members to Chief Executive to prepare Draft Development Plan	March 2021
Draft Plan prepared for presentation to the Members of the Council	Sept 2021
Consideration and adoption of Draft County Development Plan by the Members of the Council	Nov 2021
Draft Plan (as amended by elected members) on Public Display for minimum period of 10 weeks	Dec 2021
Preparation of Chief Executive's Report on Draft Plan	Feb 2022
Member's consideration of Chief Executive's Report and any amendments to Draft Plan	April 2022
Public consultation on amendments – 4 weeks	Estimate Aug 2022
Members consider Chief Executive's Report on submissions and amendments and Adoption of County Development Plan	Sept 2022

Fig. 1 – Summary of Review Process

1.1 Consultation on issues paper

Pre-Draft Consultation Process and issues paper commenced on the 24th of June 2020 and ran for eight weeks until the 21st of August 2020 inclusive. A total of 204 submissions were received.

Printed Media

Advertisements were published in the Kerryman Newspaper on the 24th of June 2020

Public Offices

It was distributed to all public libraries, public offices and was also available on the Kerry County Council website

Webinar

Due to the COVID-19 pandemic public open days were not held as per government guidelines. Two public webinars were held at which planning officials were present. A total of 204 submissions were received.

1.2 Consultation on Draft Development Plan

The Draft Kerry County Development Plan 2022-2028 and the public consultation process opened on 6th of December 2021 was undertaken for a period of just over 10 weeks from 6th of December 2021 to the 23rd of February 2022 inclusive. A total of 512 submissions were received.

Printed Media

The printed media was used to great advantage in disseminating information on the public consultation. Advertisements were placed in local newspapers and local advertiser publications.

Social Media

A social media campaign on the Draft Kerry County Development Plan 2022-2028 and public consultation programme was undertaken on Twitter and Facebook and began prior and continued weekly over the entire 10-week public consultation period.

Public Offices

A printed copy of the Draft Plan was placed on display at Council offices and at all County libraries for the duration of the public consultation programme. This included the Draft Development Plan Written Statement, Maps, Environmental Reports and all other accompanying documents.

Webinar

A webinar was held on the 13th of January 2022 which outlined the context and main issues contained in the draft plan.

Consultation Outcome

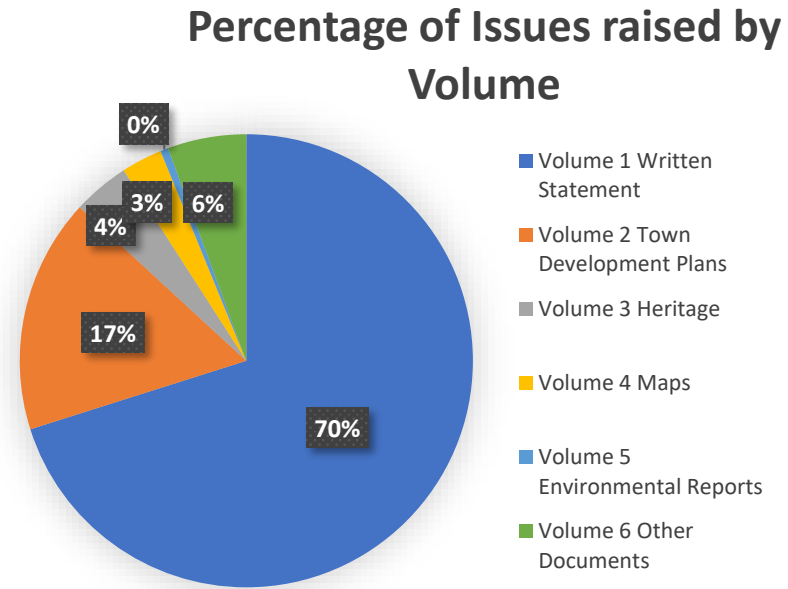
A total of 512 submissions and observations were received during the prescribed public consultation period. A large number of individually signed submissions were lodged together and these are considered as one submission.

A list of all the persons/bodies that made submissions or observations on the Draft Plan during the prescribed consultation period is provided in the appendix together with individual reference numbers that can be clicked as a link to scanned or uploaded copies of each submission.

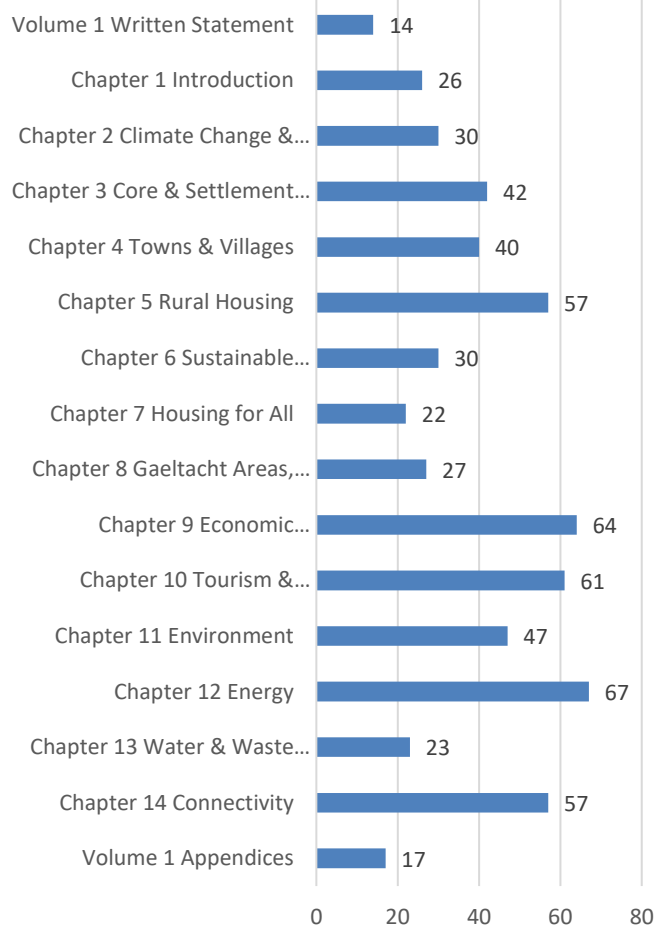
Full summaries of the issues raised in the submissions are provided in Part 2 of this report.

Full summaries of all of the issues raised in the submissions and observations are set out in Part 2 below together with the responses and recommendations of the Chief Executive.

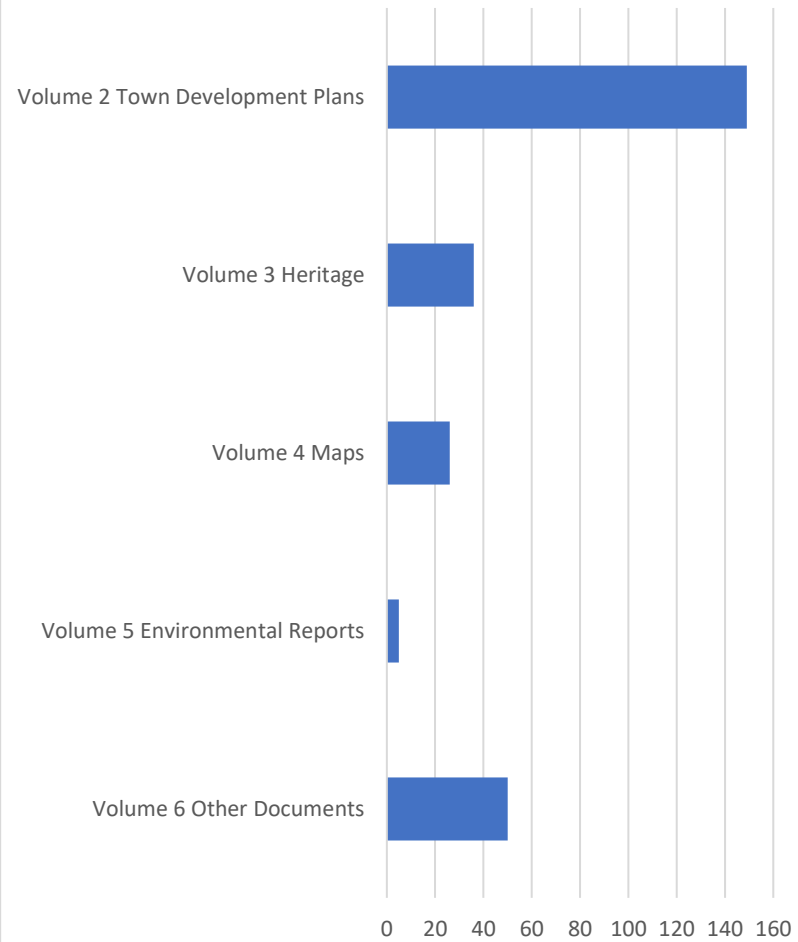
Issues have been summarised under the relevant chapter, subsection or document heading in Part 2 of this report. Table 1 below sets out the number and percentage of broad issues that were raised according to the relevant chapter heading or document.



Issues Raised in Volume 1



Submission by Volumes



The majority of the 738 broad issues that were identified from the submissions related directly to a chapter and subsection of the Draft Development Plan Written Statement or to the documents and maps that accompany the Written Statement including Environmental Reports, the Development Plan Maps and the zoning objectives of sites.

In terms of issues that were relevant to the Draft County Development Plan Review, issues relating to economic development, renewable energy and rural settlement were raised most frequently.

1.3 Next Steps

1.3.1 Consideration of Chief Executive's Report & Draft Plan

Special Meetings of Kerry County Council will take place on the 25th of April and if necessary, on 26th April 2022 to consider the CE Report.

Pursuant to Section 12(11) of the Planning and Development Act 2000 (as amended), in making the Development Plan, Kerry County Council is restricted to considering the proper planning and sustainable development of the area to which the development plan relates, the statutory obligations of the local authority and any relevant policies or objectives of the Government or any Minister of the Government.

Pursuant to Section 12(4) of the Planning and Development Act 2000 (as amended) where, following the consideration of the Draft Development Plan and this Chief Executive's Report, the members may, by resolution, accept or amend the draft plan and make the development plan accordingly at the Special Meetings. At this stage, the Development Plan will take effect 6 weeks from the day that it is made unless amendments that are considered to be material are made (see below).

Section 12(4)(b) of the Planning and Development Act 2000 (as amended) requires the Chief Executive's Report to summarise the submissions or observations made by all persons and bodies. It is also specified that this shall include issues raised by the Minister, Office of the Planning Regulator, the Southern Regional Assembly and the NTA etc.

In view of these specific requirements and their strategic nature, the submissions and observations of the Office of the Planning Regulator, the Southern Regional Assembly and the National Transport Authority are identified separately

Each summarised item is followed by the responses and recommendations of the Chief Executive.

Format of submissions, summaries and respective responses.

Some of the submissions received provide very lengthy and detailed submissions on a significant number of the existing objectives and topics contained in the 2016-2022 County Development Plan and proposed policies and objectives contained in the Draft Plan.

In this regard it should be noted that particular care has to be taken to ensure that policies and objectives are appropriate, rational, and reasonable, have a basis in Government policy and are legally sound. The CDP provisions cannot alter the national law in any regard. No policy objectives can override national statute / regulations. It must also be noted that some suggestion such as byelaws /ROWs etc are outside the remit of the Development Plan y and cannot be considered, as part of this process.

A number of the wording changes proposed relate to wording taken directly from statutes / guidelines, other plans and policy documents such as the Climate Action Plan, Local Authority development Plans and the NPF. It is not considered appropriate to make changes to text that refers to or is a direct quote from another document. A number of the changes suggested in the submissions are also considered to be overly prescriptive and would not allow for sufficient flexibility in the implementation of the plan.

It must be noted that some submissions are very detailed and contain numerous separate and specific suggestions for new objectives or amendments to existing objectives. The reader is therefore advised to read the submission in full using the associated attached links in the left column of each submission.

Submissions received regarding zoned lands contained within Local Area Plan boundaries.

A number of submissions have been received seeking the rezoning at various locations throughout the county. These areas and their respective zonings are covered under the various LAP's (Tralee M. D. LAP 2018-2024, Killarney M. D. LAP 2018-2024, West Iveragh LAP 2019-2025, Listowel Municipal District Plan 2020-2026, Corca Dhuibhne Electoral Area Local Area Plan 2021-2027).

It should be noted that the land use zonings contained in the former town development plan serving Tralee, Killarney & Listowel were incorporated into the Draft plan as read with no changes having regard to the recent review of these plans in recent years.

Following the adoption of this CDP, a review of the LAP's will commence in sequence beginning with East Iveragh(south Kerry), Tralee + Killarney. The issue of land use zonings in specific settlements can be considered as part of these processes.

1.3.2 Proposed Amendments – Stage 3

In the case where a proposed amendment or amendments would, if made, be a material alteration of the Draft Plan, it is a requirement under Section 12(7) of the Planning and Development Act 2000 (as amended) for the planning authority to publish notice of the proposed amendment(s) within 3 weeks after the passing of the resolution and to make the amendment(s) available for inspection and submission/observation for a period of not less than 4 weeks. A further Chief Executive's Report on the outcome of the consultation period must be prepared within 8 weeks of the published notice of the proposed amendment(s).

It is then a requirement for the members of the authority, by resolution, to make the County Development Plan with or without the proposed amendment/s not later than 6 weeks after the submission of a Chief Executive's Report on the Material Alterations. Once the Development Plan is made, it comes into effect 6 weeks later.

In the case where it is determined that a strategic environmental assessment and/or an appropriate assessment is or are required to be carried out in respect of one or more proposed material alteration(s), it is a requirement (within 2 weeks of the determination) for the Chief Executive to specify the period required for assessment following the passing of the resolution. In such instance it is a requirement of the planning authority to publish notice of the proposed material alteration and the determination to carry out the assessment or assessment(s).

Abbreviations

<p>AA Appropriate Assessment ABP An Bord Pleanála ACA Architectural Conservation Area AD Anaerobic Digestion AEC Atlantic Economic Corridor BER Building Energy Rating BAT Best Available Technology CDP County Development Plan CEB County Enterprise Board CFRAMS National Catchment Flood Risk Assessment and Management CIP Capital Investment Plan CSO Central Statistics Office CZM Coastal Zone Management DoAFM Department of Agriculture, Food and the Marine DoCEDIY Department of Children, Equality, Disability, Integration and Youth DoEd Department of Education DoETE Department of Enterprise, Trade and Employment DoECC Department of Environment, Climate and Communications DoEdRIS Department of Further and Higher Education, Research, Innovation and Science DoHe Department of Health</p>	<p>DoHLGH Department of Housing, Local Government and Heritage DoRCD Department of Rural and Community Development DoSP Department of Social Protection DoTCAGSM Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media DoT Department of Transport DMURS Design Manual for Urban Roads & Streets ECD Economic Development Fund END European Noise Directive EPA Environmental Protection Agency EIA Environmental Impact Assessment END European Noise Directive EPA Environmental Protection Agency EU European Union EV Electric vehicle FDI Foreign Direct Investment GHG Green House Gas GIS Geographical Information Systems GSI Geological Survey of Ireland HDA Habitats Directive Assessment HNDA Housing Needs Demand Assessment HSA Health and Safety Authority</p>	<p>ICZM Integrated Coastal Zone Management IAA Irish Aviation Authority IDA Industrial Development Authority IIPC Integrated Pollution Control Licence ISO International Standards Organisation IWTN Irish Walled Towns Network KCC Kerry County Council KIA Kerry International Airport KHKT Kerry Hub & Knowledge Triangle LAP Local Area Plan LCA Landscape Character Assessment LCT Landscape Character Type LEO Local Enterprise Office LECP Local Economic & Community Plan LUTS Land Use and Transportation Study MANs Metropolitan Area Networks MD Municipal District MTU Munster Technological University NCCS National Climate Change Strategy NBS National Broadband Scheme NDP National Development Plan</p>	<p>NEWKD North East West Kerry Development NHA Natural Heritage Area NIAH National Inventory of Architectural Heritage NPF National Planning Framework NECP National Energy & Climate Plan NPO National Planning Objectives NPWS National Parks & Wildlife Service NSS National Spatial Strategy OPR Office of the Planning Regulator OPW Office of Public Works PHC's Primary Healthcare Centres PPN Public Participation Network RPS Record of Protected Structures RBD River Basin District RBMP River Basin Management Plans RRDF Rural Regeneration & Development Fund RSES Regional Spatial & Economic Strategy SAC Special Area of Conservation SAL Significant Archaeological Landscape SEA Strategic Environmental Assessment</p>	<p>SEAI Sustainable Energy Authority of Ireland SFRA Strategic Flood Risk Assessment SKDPL South Kerry Development Partnership Ltd SEO Strategic Environmental Objective SME Small and Medium sized Enterprises SMR Sites and Monuments Record SPA Special Protection Area SuDS Sustainable Drainage Systems SWRBMP South Western River Basin Management Plan TII Transport Infrastructure Ireland UFW Unaccounted for Water URDF Urban Regeneration & Development Fund UnG Udarás na Gaeltachta WSIP Water Services Investment Programme WSSP Water Services Strategic Plan WWTP Wastewater Treatment Plant WFD Waste framework Directive</p>
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**Chief Executive's Report on Draft Plan Public Consultation
Draft Kerry County Development Plan 2022-2028
Statutory Bodies**

KE-C1-3 Department of Environment, Climate and Communications

<p>Summary</p> <p>This submission requests that the Local Authority would consult directly with their respective Regional Waste Management Planning Office regarding development of the final plans.</p>	<p>Response</p> <p>Submission is noted. The Local Authority has consulted with the respective Regional Waste Management Planning Office – namely the Southern Region Waste Management Office. The Southern Region Waste Management Office made a separate submission [see Submission KE-C1-375] and proposed amendments arising from this submission.</p>
<p>Recommendations</p> <p>No proposed amendments</p>	

KE-C1-5 Environmental Protection Agency

<p>Summary</p> <p>Submission notes that Kerry County Council (KCC) should ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Southern Regional Spatial and Economic Strategy.</p> <p>The submission also provides comments on the SEA Environment Report. This are summarised as follows:</p> <ul style="list-style-type: none"> • Non-Technical Summary: Consider inclusion of key graphics/maps to further enhance content in the NTS. • Assessment of Environmental Effects: KCC should assess and document the full range of likely significant environmental effects of implementing the Plan, including the potential for cumulative effects in-combination with other relevant Plans/ Programmes and Projects. • Mitigation Measures: Where the potential for likely significant effects have been identified, KCC should provide appropriate mitigation measures and the Plan includes clear commitments to implement the mitigation measures. • Monitoring: Programme should be flexible; consider and deal with the possibility of cumulative effects; consider positive and negative effects; set out the various data sources; monitoring frequencies and responsibilities. If the monitoring identifies adverse impacts during the implementation of the Plan, KCC should ensure that suitable and effective remedial action is taken. 	<p>Response</p> <p>Chapter 1 of the CDP outlines the planning policy context of the Plan and how it is influenced by a number of strategic European, National, Regional and local strategies/reports. In particular, Section 1.9.3 places the CDP within National planning policy, notably Project Ireland 2040. The Local Authority is satisfied that the CDP strongly aligns with key higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework & Development Plan and the Regional Spatial & Economic Strategy for the Southern Region (RSES).</p> <p>It is acknowledged that on adoption of the plan a SEA Statement will be required while it is also noted that any future variation to the plan will need to be in compliance with the SEA Directive, as transposed.</p>
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<ul style="list-style-type: none"> • State of the Environment Report – Ireland’s Environment 2020 should be included the plan and findings in the SEA, as relevant and appropriate. • Future Amendments to the Plan: KCC should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan. <p>SEA Statement - once the Plan is adopted, KCC should prepare an SEA Statement as per the SEA regulations making a copy of the SEA Statement available to environmental authorities consulted during the SEA process. Environmental Authorities are listed.</p>	
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<p>Recommendations</p> <p>No proposed amendments</p>

<p>KE-C1-26 Irish Water</p>	
<p>Summary</p> <p>Irish Water (IW) recommend that all surface water run-off from these key initiatives should be managed via nature-based solutions or alternatively separate storm systems, with the storm system discharging to a separate storm system and /or open water watercourse. It requests that where Irish Water assets are within a proposed development site, these assets must be protected or diverted.</p> <p><u>Wastewater Infrastructure</u></p> <p>It states that the two key towns in the Kerry (Killarney and Tralee), as well as the five Regional Towns, have headroom or have projects underway to provide additional capacity. There is currently no spare WWTP capacity available in the district town of Fenit, however, a project is under way through the Small Towns and Villages Growth Programme to upgrade this facility which will be completed within the lifetime of the plan period.</p> <p>It states that further upgrade(s) may also be progressed under Irish Water’s Small Towns and Villages Growth Programme which is intended to provide growth capacity in Irish Water’s treatment plants in smaller settlements which would not otherwise be provided for in the current Investment Plan. Irish Water has recently also announced investment in the Knightstown WWTP through the Small Towns and Villages Growth Programme initiative. It may be noted that the Small Towns and Villages Growth Programme is reserved specifically for settlements already connected to Irish Water infrastructure.</p>	<p>Response</p> <p>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 within 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 WWTU. IW will be consulted during its preparation, and any development layout will be cognizant of the WWTU.</p> <p>See Chapter 13, specifically Objectives KCDP 13-3, KCDP 13-16, KCDP 13-18 and KCDP 13-25.</p>

It states that KCC may wish to consider restricting development in these instances given the potential operational impacts e.g. significant traffic movements, noise/ odour nuisance, on existing wastewater treatment facilities, e.g., Tralee WWTP.

Drainage Area Plan

A Drainage Area Plan (DAP) is underway for Killarney and Tralee agglomerations and is due to be completed in 2023. This will assess the wastewater network in detail to identify issues and needs. Irish Water will engage with Kerry County Council to ensure planned growth in the strategic growth areas is taken account in the DAP.

Tralee, and to a lesser extent Killarney, will require network upgrades to cater for these growth targets. IW will identify the specific upgrades needed to cater for existing load and zoned sites. Each new development should be on separate foul and storm systems, with the storm system discharging to a separate storm system and /or open water watercourse.

The Listowel DAP is ongoing and preliminary studies have identified network capacity constraints.

Comments and Suggestions

Objectives KCDP 5-9/13-17 - There is a general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection networks. Alternative solutions such as private wells or wastewater treatment plants should not generally be considered by planning authorities. Irish Water will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance.

Wastewater Network capacity in Tralee- The wastewater network in areas of Tralee is hydraulically constrained, new development loads should be offset by storm separation elsewhere within the particular sub-catchment (i.e., reducing the overall hydraulic discharge to the networks). The Planning Authority could aid this by identifying large impermeable public areas that could be separated out or catered for via a nature based sustainable urban drainage proposal.

Recommendations

No proposed amendments

KE-C1-35 Cork Airport [Gary Mackin]	
Summary This submission supports Chapter 14 – Connectivity, specifically Objective KCDP 14-51 and the development of a Tri-Airport Strategy for the Southern Region (including Cork and Shannon airports).	Response The contents of the submission are noted and the support is welcomed.
Recommendations No proposed amendments	

KE-C1-66 Transport Infrastructure Ireland	
Summary TII notes and welcomes the clear alignment of the Draft Plan policies with the provisions of Government policy included in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012) which are given effect in Objectives KCDP 14-27, KCDP 14-28 and KCDP 14-29 and also the Development Plan policy concerning access onto national routes with Government Policy. TII requests the inclusion of Core Strategy Objectives to reflect official policy requirements including maintaining the strategic function, capacity and safety of the national roads network and to ensure quality levels of service, safety, accessibility and connectivity to transport users. TII recommends that the Draft Plan should include a new Objective in Chapter 9, for example; ‘Proposals for economic development, including those related to Strategic Economic Drivers in the Development Plan will be progressed complementary to safeguarding the strategic function, safety and investment in the strategic national road network to date and in compliance with the provisions of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012)’. The TII note that the Draft Plan does not spatially identify the economic development generating lands. TII recommends that any Masterplan for the ‘Employment Landbank’ to the north of the N22, national road, included in the Killarney (Draft) Town Plan and subject to Objective KA 49 needs to be supported by a Strategic Transport Assessment (STA)/Area Based Transport	Response 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. It is considered prudent to amend the Core Strategy to include and reflect the official policy requirements, summarised as; <ul style="list-style-type: none"> - to maintain the strategic function, capacity and safety of the national roads network, and - 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. 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. It is considered acceptable to include new Objective included in Section 9.6; (Objective KCDP 9-15) regarding ‘Proposals for economic development’ see below. Lands are zoned for economic development within the town plans and within the Municipal District LAPs. It is an objective of the Killarney MD LAP to prepare a Masterplan for the lands to the north of the N22. It is within this context that zoning designations in the Killarney Town Draft Plan identified within the Constraints Study Area of the N22 Farranfore to Killarney

<p>Assessment (ABTA) to demonstrate that the lands can be served by sustainable and active travel modes and that development can proceed complementary to safeguarding the safety and strategic function of the national road network in the area.</p> <p>TII also advise that their lands are located within the N22 area and that any future masterplan/LAP's/development proposals must not impact on existing and future national road infrastructure.</p> <p>TII request clarification in relation to the role of Transport and Mobility Plans identified in the respective Town (Draft) plans for Tralee, Killarney and Listowel and their proposed relationship with Local Transport Plans (LTP) identified in Objective KCDP 14-22 of the Draft Plan.</p> <p>TII would welcome an 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 in accordance with Government policy by utilizing available alternatives. TII requests that 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>It states that Section 1.2.1 and Section 1.20 refers to the NRA, it requests updated referencing to TII and TII Publications is included in the Draft Plan.</p> <p>Having regard to assessment and development management next to road junctions, TII would welcome amendment to Objective KCDP 14-27 to include specific reference to safeguarding the national road network,</p>	<p>Scheme shall be reviewed. The Council will ensure that proposals comply with Government policy to safeguard national road scheme planning and do not impact the delivery of the Scheme which is an Objective of the National Development Plan. In all instances, the Masterplan will be developed in consultation with and subject to the agreement of TII.</p> <p>The Council will liaise with the TII to ensure the strategic national road network and in particular the proposed Lewis Road junction, is protected and enhanced.</p> <p>The Council will exercise particular care in the assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations where such development could generate significant additional traffic with potential to impact on existing and future national road infrastructure, with particular regard to the N22 Killarney to Farranfore National Road Scheme Constraints Study Area.</p> <p>It is an objective of the plan (KCDP 14-22) to prepare LTPs for the key towns. KCC would welcome support and consultation with all stakeholders on the preparation of Local Area Plans and the Local Transport Plans. KCC acknowledge that findings and recommendations of any Local Transport Plans, undertaken in accordance with ABTA, will be incorporated into the preparation of the statutory Local Area Plans.</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>Reference to the TII and TII Publications will be included and updated in the Draft Plan.</p> <p>In the preparation of the Draft Plan KCC had regard to all relevant policies and guidelines, however it is considered prudent to include the following paragraph in 14.4; In accordance with Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities, particular care must be exercised in the assessment and management of development proposals in the Development Plan relating to</p>
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<p>TII acknowledges the support for the primary retail areas in Town and Village Centre. In the interests of clarity, TII would welcome a new policy objective included in the Development Plan to reference the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads.</p> <p>TII would welcome the inclusion of a policy position reflecting the requirements outlined in Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines relating to the provision of service areas and roadside facilities on national roads in the Draft Plan and the requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions.</p> <p>TII would welcome a new Objective included in the Development Plan outlining that; ‘The capacity and efficiency of the national road network drainage regimes in County Kerry will be safeguarded for national road drainage purposes’.</p> <p>The TII note that Noise is addressed in Section 11.3.2 of the Draft Plan. It states that Government policy requires that development proposals identify and implement noise mitigation measures, where warranted, for noise sensitive development proposed in the vicinity of existing or proposed national roads, it suggests that consideration be given to the identification and implementation of noise mitigation measures. It requests that the costs of implementing mitigation measures should be borne by the developer.</p> <p>TII recommends review of the zoning designations identified to the south of Blennerville adjoining the N86, national road, to ensure development objectives are appropriately aligned with national road speed limit.</p>	<p>development objectives or the zoning of locations at or close to junctions on the national road network in accordance with the provisions of official policy.</p> <p>It is considered acceptable to amend Objective KCDP 14-27 to include specific reference to safeguarding the national road network, <i>including associated junctions</i>. See amendment as set out in the Recommendations.</p> <p>There is explicit presumption against large out of town retail centres in Section 4.4.4.3.2 of the Plan therefore it is considered that the inclusion of a new policy objective against same is not merited.</p> <p>It is also an Objective 4-43 to prepare a town centre and retail strategy for the county, the Council note the TII’s support for same.</p> <p>The Planning Authority is aware that Section 2.8 of the DoECLG Guidelines indicate the requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions and also addresses roadside service facilities on non-motorway national roads and their junctions.</p> <p>TII will be consulted regarding any proposal. In this regard it is considered prudent to include the following text in section 14.4.1 it is the policy of the Council to comply with the requirements outlined in Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines relating to the provision of service areas and roadside facilities on national roads in the Draft Plan and the requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions.</p> <p>Having regard to the extensive national road network in Kerry, it is considered prudent to ensure that the capacity of the road network is vital and it is therefore recommended to include new Objective 14-32; See amendment as set out in the Recommendations.</p> <p>Objective KCDP 11-37 considers noise impact related to new road infrastructure. Government policy requires that development proposals identify and implement noise mitigation measures, where warranted, for noise sensitive development proposed in the vicinity of existing or proposed national roads. It is considered prudent to include additional wording - See amendment as set out in the Recommendations.</p> <p>There are no lands zoned outside the development boundary of Tralee to the south of Blennerville that are outside the 50km/h speed limit.</p>
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Recommendations

Amend Section 3.4 to include and reflect the official policy requirements, summarised as;

- to maintain the strategic function, capacity and safety of the national roads network, and
- 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.

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.

Amend Objective KCDP 14-27 to include specific reference to safeguarding the national road network, including associated junctions, as follows; Protect the capacity and safety of the National Road and Strategically Important Regional Road network in the County and ensure compliance and adherence to the provisions of official Government policy outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) in order to safeguard carrying capacity and safety of National Primary and Secondary Routes and associated national road junctions.

Include the following in Objective 11-37: Development proposals should identify and implement noise mitigation measures, where warranted, for development proposed in the vicinity of existing or proposed national roads. The costs of implementing mitigation measures shall be borne by the developer, as the Authority will not be responsible for the provision of additional noise mitigation.

Include new Objective included in Section 9.6; (Objective KCDP 9-15) 'Proposals for economic development, including those related to Strategic Economic Drivers in the Development Plan will be progressed complementary to safeguarding the strategic function, safety and investment in the strategic national road network to date and in compliance with the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012)'.

Include the following in Section 14.4.1 - It is the policy of the Council to comply with the requirements outlined in Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines relating to the provision of service areas and roadside facilities on national roads in the Draft Plan and the requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions.

Include new Objective 14-32; 'The capacity and efficiency of the national road network drainage regimes in County Kerry will be safeguarded for national road drainage purposes'.

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.

Include within Section 9.6; 'Proposals for economic development, including those related to Strategic Economic Drivers in the Development Plan will be progressed complementary to safeguarding the strategic function, safety and investment in the strategic national road network to date and in compliance with the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012)'.

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.

Include the following paragraph in 14.4 ; In accordance with Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities, particular care must be exercised in the assessment and management of development proposals in the Development Plan relating to development objectives or the zoning of locations at or close to junctions on the national road network in accordance with the provisions of official policy.

Include the provisions of Section 3.8 of the DoECLG Spatial Planning and National Roads Guidelines concerning signage.

Amendment to reference to the Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011) to reflect that they represent a TII/NRA policy statement.

The Council will edit/replace all references in the Draft Plan to the NRA and NRA DMRB with TII and TII Publications.

KE-C1-82 Southern Regional Assembly SRA

Summary	Response
<p>The Southern Regional Assembly confirms that the Draft Kerry County Development Plan is, as far as is practicable, consistent with the RSES. The submission contains an analysis of a number of headings/Draft chapters and includes a number of recommendations that will assist in achieving better alignment between the provisions of the NPF, RSES and the Draft Plan. The SRA considers that the Draft Plan settlement strategy is adequately framed by the availability and capacity of water and wastewater services and it is considered that the availability of such services are aligned with the Draft Development Plan Core Strategy.</p> <p>1: Objective in Support of Co-Ordination with the Climate Action Regional Offices</p> <p>The SRA recommend an additional objective reaffirming continued co-ordination and support for initiatives with the Climate Action Regional Offices (CAROs), particularly the Atlantic Seaboard South CARO, to assist implementation of Development Plan policies and objectives for climate action mitigation and adaptation.</p> <p>2: Objective for Compact Growth Targets</p> <p>The 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 (in addition to the Key Towns) is included.</p> <p>3: Details on Zoning Areas under the Core Strategy Tables</p>	<p>Noted</p> <p>1: Objective in Support of Co-Ordination with the Climate Action Regional Offices</p> <p>Response: 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.</p> <p>2: Objective for Compact Growth Targets</p> <p>Response: 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>

The Core Strategy tables should include- Details of areas already zoned for residential use or mixed-use that includes residential development, in hectares and housing unit numbers- Details of areas proposed to be zoned for residential use or mixed-use that includes residential development

4: Allocation of Growth to Key Towns and Regional Towns

The SRA supports the evidence-based, infrastructure led allocation of growth to settlements. In this regard, it is recommended that in the final determination of allocated population growth and housing targets under the Core Strategy, the growth of Key Towns, is reinforced and referenced through the Core Strategy. The distribution of growth across the tier of Regional Towns should also be tailored in accordance with the principles and sustainable criteria of NPF National Policy.

5: Support for Evidence Based Objectives

The SRA commend the evidence-based approach to inform objectives delivering the Core Strategy, the use of GIS data and mapping analysis under Appendix 8 of the Draft Plan and the use of a common methodology for the identification of areas under urban influence and other rural areas thereby ensuring a consistent approach for all areas of the county. This evidence base should underpin Rural Housing Objectives KCDP 5-12 to 5-14 to ensure a consistent approach across the county and alignment to NPF National Policy Objective 19 and RSES RPO 27 Rural in support of rural economies and communities.

3: Details on Zoning Areas under the Core Strategy Tables

Response: See OPR

The Draft Development Plan Guidelines section 1.3.2 (appendix) lays out the “Differentiated Approach to Core Strategy Tables” to outline the allocation of housing and population across settlements in the county. The table should be tailored to provide a limited amount of detail reflective of the smaller number of settlements.

A revised core strategy table which includes details of areas existing and proposed zoned (in ha) for residential use/mixed-use (including residential), approximate residential density and the amount of infill and greenfield (ha) should be included.

4: Allocation of Growth to Key Towns and Regional Towns

Response:

Section 3.10.3 Population Distribution outlines the rationale used to distribute population throughout the county. The population growth allocation for Tralee and Killarney is 4,371. This growth allocation will ensure that these Key Towns will grow by over 30% by 2040 (in accordance with the RSES) positioning these settlements as national and regional investment locations due to their competitiveness and attractiveness. The remaining population growth of 5,070 is allocated to other towns in the County and the rural area. This will ensure that development in these towns is commensurate with the scale of these towns and the provision of additional employment. The population growth figures for the towns have also been informed by the Housing Strategy/HDNA and the Council “Housing Delivery Action Plan. The population growth/housing targets for a number of the towns have been slightly adjusted to provide an adequate social mix in the development of private and social housing.

5: Support for Evidence Based Objectives

Response:

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.

6: Additional Clarifications in the Settlement Hierarchy

The SRA support the Core Strategy Settlement Hierarchy and the strategic approach of the Core Strategy under Map 3.1. Additional clarification should be included in the description of settlement types; namely that Key Towns have significant influence in a regional and sub-regional context and the Regional Towns, as a designated category, is a Local Authority designation under the Core Strategy reflecting the role of these settlements in a county context.

7: Support for Inter Urban Networks

Regarding the Kerry Hub and Knowledge Triangle, It is requested that the Plan should recognise the potential for innovative projects, collaboration between stakeholders and sectors, infrastructure projects to/ from and within the network to unlock the strengths and opportunities. Such strengthening supports the network’s full potential as a driver of economic growth for the County and Region. The following sections should be strengthened on this basis: Kerry Hub and Knowledge/ triangle, Kerry International Airport, Regional Towns, North Kerry/West Limerick/Shannon Estuary/Clare Network, Shannon Estuary,

8: Strengthening of Connectivity Objectives

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.

Include a complementary transport objective in Chapter 14 for sustainable transport infrastructure and seek integration of 10 Minute Town concepts in Local Area Plans and Local Transport Plans.

6: Additional Clarifications in the Settlement Hierarchy

Response:

Tralee and Killarney are identified as Key Towns in the RSES. It is a principle of the core strategy of the plan to prioritise the sustainable development of the Key Towns of Tralee and Killarney within the Kerry Hub and Knowledge Triangle in line with the RSES. The plan recognises that the key towns have significant influence in a regional and sub-regional context. It is also recognised that Regional Towns, as a designated category, is a Local Authority designation under the Core Strategy reflecting the role of these settlements in a county context rather than in a wider regional (SRA) perspective. It is considered prudent to make these slight amendments in the interest of clarity.

7: Support for Inter Urban Networks

Response: The Local Authority welcomes the recommendation put forward by the Assembly as the Draft Plan recognises the Kerry Hub and Knowledge Triangle as a key economic driver within the county and therefore further text will be added to strengthen the RSES support for this network. It is considered appropriate to include addition text and objective see recommendation below.

8: Strengthening of Connectivity Objectives

Response: 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. There are a range of policies and objectives [KCDP 14-8 - 4-22] in the Plan to achieve modal shift that are applicable to rural and urban areas.

a specific objective for Smart Mobility initiatives should be included that would accord with RPO 160 Smart and Sustainable Mobility, RPO 161 Smart Mobility and RPO 162 Multi-Modal Travel Integration.

The support in the plan for international connectivity and coordination with stakeholders for airport and port strategies on a regional basis is strongly welcomed. It suggests an additional objective in support of a Regional Freight Strategy in alignment with RPOs 140 and 141 would complement Objectives KCDP 14-51 and KCDP 14-55.

It requests a specific objective in support of public transport services and interchange facilities between modes servicing tourism across the County and to service the Wild Atlantic Way should be included and align with RPO 173 Tourism Corridors.

It requests a specific objective in support of strengthening multi-modal connectivity and digital connectivity to, from and within the Inter Urban Networks of the Kerry Hub and Knowledge Triangle (including Kerry International Airport) and North Kerry/Shannon Estuary Network.

Clarity regarding the development of future Transport Mobility Plans and delivering Local Transport Plans as Draft Plan Objective KCDP 14-22.

A minor amendment is noted under Objective KCDP 14-6, where the SRA are intended as the Regional Assembly to be included as a stakeholder within the objective.

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.”

The Local Authority welcome the comments from the Assembly in relation to additional objectives or strengthening existing objectives. Amendments and additions to objectives are set out in the recommendations below.

The Assembly have raised a query stating that it is unclear if the development of future Transport Mobility Plans is the same intent as preparing and delivering Local Transport Plans as Draft Plan Objective KCDP 14-22 seeks the preparation of Local Transport Plans for the Key Towns and other settlements and stating that these two objectives can either be merged or reviewed if they seek the same outcomes and plan preparation.

To provide clarity, a Local Transport Plan (LTP) would be expected to consider all modes of transport i.e., train, bus, car, bike, walking. Land use patterns would also form part of such a Plan. These will be produced based on the Area Based Transport Assessment (ABTA) guidance produced by the NTA and Transport Infrastructure Ireland (TII). LTPs will be based on a clear set of objectives and include priorities for each settlement in terms of public transport infrastructure and services, cycle investment, improvements to the pedestrian environment and road enhancements. LTPs and LAPs will be aligned to enable the integration of land use and transportation over the lifetime of this plan. It is envisaged that these will be prepared for the Key Towns of Tralee and Killarney which is reflected in Objective KCDP 14-22 which states “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.”

However, the LTPs are separate to the NTA funded Transport Mobility Plans (TMP’s) for Tralee, Killarney and Listowel which will only examine facilities for cycling and walking under the Active Travel Programme. Objectives KCDP 14-10 and KCDP 14-11 relate to the preparation of TMP’s

<p>9: include Strengthened Objectives in support of Strategic Employment Locations, Regional Knowledge Diffusion and Smart Specialisation, Regional Skills Forum.</p> <ul style="list-style-type: none"> • Support for the role of the Munster Technological University (RSES RPO 184) as a driver of the regional economy and key stakeholder for a Learning Region. • Reference could be included to analysis and reports of the Southern Regional Assembly in support of a Regional Approach to Smart Specialisation (link below) and forthcoming Smart Southern Region. 	<p>for these three settlements. KCDP 14-10 states “Facilitate and support the development of Transport Mobility Plans for Tralee, Killarney and Listowel and the subsequent rollout of Active Travel related infrastructure in these towns” and KCDP 14-11 states “Develop in accordance with the National Cycle Manual and the NTA, an integrated network of cycle ways in our larger urban centres, to ensure permeability within and between residential areas, linking to town centres, schools and places of work informed by Transport Mobility Plans for Tralee, Killarney and Listowel.”</p> <p>Therefore, the three objectives KCDP 14-10, KCDP 14-11 and KCDP 14-22 will remain as per the draft plan.</p> <p>9: Strengthened Objectives in support of Strategic Employment Locations, Regional Knowledge Diffusion and Smart Specialisation</p> <p>Response: 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.</p> <p>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.</p> <p>In designating land for future employment/enterprise growth in the settlements, the following guiding principles/criteria were considered:</p> <ul style="list-style-type: none"> • Scale of population and its existing performance. • Scale of employment provision, number of jobs, jobs-to-resident worker’s ratio, and net commuting flows; Balance between population growth and employment provision. • Compliance with the NPF (NPO 72) on a standardised, tiered approach that differentiates between 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 availability and deliverability of lands within the existing built-up footprints. Availability of lands adjacent to existing enterprise/ employment areas • Ease of access on the national road/rail network
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<p>10: Support for Regional and Local Authority Frameworks for 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>11: Local Authority Renewable Energy Strategy</p> <p>The SRA commend the objectives under Chapter 12 Energy, support for renewable energy and transit to a low carbon society and economy. It 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.</p> <p>12: Support for District Heating Projects</p> <p>The SRA recommend a strengthening opportunity under Chapter 12 Energy to support with a new objective the Council’s leadership role in pioneering a district heating system in the Key Town of Tralee through its biomass plant and the feasibility of extending the system in Tralee. The SRA would welcome support for the project as good practice for the County and Region and we support the Council’s EU project partnerships under this theme.</p>	<ul style="list-style-type: none"> • Extent to which sustainable modes of travel can be encouraged (rail freight, port) or public transport). • Accessibility and influence in a regional/sub-regional/county context. • Environmental and infrastructural constraints. • The appropriate density and scale of development relative to the settlement and location. • Availability of SMART technology /broadband etc <p>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>10: Support for Regional and Local Authority Frameworks for GBI and NBS</p> <p>Response: 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>11: Local Authority Renewable Energy Strategy</p> <p>Response: 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. The Local Authority welcome the Assembly’s comments in relation to the preparation of a Renewable Energy Strategy and a new objective will be included to this effect.</p> <p>12: Support for District Heating Projects</p> <p>Response: The Draft Plan contains two objectives relating to district heating systems [KCDDP 12-5 & 12-28].</p> <p>KCDP 12-5 Consider the sustainable development of Data Centres at appropriate locations powered by renewable energy where it can be demonstrated that there will be no significant adverse impact on the built and natural environment, visual character of the landscape or on</p>
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residential amenities. Seek opportunities to recover waste heat to support potential decarbonisation projects such as district heating schemes.

KCDP 12-28 Promote and facilitate the installation of district heating schemes powered by renewable fuel sources that are produced in a sustainable manner.

Recommendations

Include additional 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.

Include additional wording in 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.

It is recommended to replace Map 5.1 with that shown as Map 8.8 in Vol1 Appendix.

Amend Settlement Types table 3.5

Key Town Large population scale urban centre functioning as self-sustaining regional drivers, and strategically located urban centres with accessibility and significant influence in a regional and sub-regional context.

Regional Town Towns which provide a housing, employment, or service function serving a local region within the county. The category is broad and ranges from large commuter towns to more peripheral towns.

Urban Networks

At 3.5.1.4 insert text; Kerry County Council supports the economic role and potential of the established towns of Listowel, Abbeyfeale, Newcastle West (Key Town) and Kilrush as economic drivers in a potential North Kerry/West Limerick/Clare network connected with the Shannon Estuary referred to as the North Kerry/Shannon Estuary Network. This includes the Shannon Integrated Framework Plan (SIFP) area and strategic locations identified under the SIFP as a Shannon Estuary Coastal Network. This area is viewed as a driver for economic growth within the County and Region. There is potential for innovative projects, collaboration between stakeholders and sectors, infrastructure projects (including multi-modal transport infrastructure, more frequent public transport services and digital connectivity) to/ from and within the network to unlock the strengths and opportunities. This includes the County's Regional Town of Listowel, Ballybunion and support for economic interaction with the AEC, Strategic Development Sites in the Shannon Estuary, the Kerry Hub and Knowledge Triangle and cross county boundary connectivity to other settlements in a network (including Newcastle West in Limerick as a Key Town, Port of Shannon Foynes, Limerick-Shannon Metropolitan Area etc).

4.4.4.1.2 has been addressed in the previous section.

At 9.4.2 insert text; The Council supports the economic role and potential of the established towns of Listowel, Abbeyfeale, Newcastle West and Kilrush as economic drivers in a potential North Kerry/West Limerick/Clare network connected with the Shannon Estuary. This includes the Shannon Integrated Framework Plan (SIFP) area and strategic locations identified under the SIFP as a Shannon Estuary Coastal Network which includes the Tarbert/Ballylongford Landbank. Opportunities exist to further develop connections, collaborations and innovative projects between these areas which are supported by the Plan.

At 9.6.1.1 insert text; The Shannon Integrated Framework Plan (SIFP) is a land and marine based framework plan to guide future development of the Shannon Estuary. It has identified 9 no. strategic development locations in counties Clare, Limerick and Kerry and aims to build on existing industry connectivity and synergy as well as the existing infrastructure to create a more sustainable and attractive network for further investment. 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. **This area is viewed as a driver for economic growth within the County and Region. There is potential for innovative projects, collaboration between stakeholders and sectors, infrastructure projects to/ from and within the network to unlock the strengths and opportunities for the area.**

At 3.5.1.3 insert text; **There is significant potential for innovative projects, collaboration between stakeholders and sectors, infrastructure projects (including multi-modal transport infrastructure, more frequent public transport services and digital connectivity) to/ from and within the network to unlock the strengths and opportunities.**

At 3.5.1.5 insert text; **The airport lies within the Kerry Hub and Knowledge Triangle and therefore there exists opportunities for collaboration between stakeholders and sectors in order to further build upon the economic and infrastructural assets of the county.**

At 4.4.4.1.2 insert text; **Many of these regional towns have important connections to key towns which are located within the Key towns and have an important role in Inter-Urban Networks.** Where the town is not close to a Key town and there is a large catchment there should be a good range of comparison shopping with a mix of uses and services. These towns should contain at least one supermarket and smaller scale comparison department store to cater for local needs.

At 9.4.1 insert text; **There is significant potential for innovative projects, collaboration between stakeholders and sectors, infrastructure projects (including multi-modal transport infrastructure, more frequent public transport services and digital connectivity) to/ from and within the network to unlock the strengths and opportunities.**

Objective KCDP 9-8 insert text; Support the further development of the Kerry Hub & Knowledge Triangle and the North Kerry/ Shannon Estuary Networks, and their potential to create substantial economic benefit to the County **as well as collaborations within these networks to create economic benefits.**

Connectivity

Objective 14-1 insert wording - Deliver sustainable transport infrastructure investments as identified for the road network, public/rural transport, and walking/cycling infrastructure, **to facilitate and realise the 10 minute town concept.**

Insert new objective - **Seek integration of 10 Minute Town concepts in Local Area Plans and Local Transport Plans**

Objective 14-66 insert wording - Develop Smart Towns/Villages as engines for a Smart County (urban and rural) by supporting the initiatives of the All-Ireland Smart Cities Forum, seeking good practices yielded through living labs, testbeds and investment in the initiatives of stakeholders, **as well as integrating smart mobility initiatives.**

Insert new objective - **To support the preparation of a Regional Freight Strategy to further develop and enhance connectivity on road and rail networks, to facilitate the movement of freight, in a sustainable manner.**

Insert new objective - **Support and facilitate the sustainable development of public transport services and interchange facilities between transport modes servicing tourism destinations and along the Wild Atlantic Way.**

Insert new objective - **support of strengthening multi-modal connectivity and digital connectivity to, from and within the Inter Urban Networks of the Kerry Hub and Knowledge Triangle (including Kerry International Airport) and North Kerry/Shannon Estuary Network.**

Employment

Include the Criteria (see below) for designating employment zonings in section 9.6.1; • Scale of population and its existing performance.

- Scale of employment provision, number of jobs, jobs-to-resident worker's ratio, and net commuting flows; Balance between population growth and employment provision.
- Compliance with the NPF (NPO 72) on a standardised, tiered approach that differentiates between 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 availability and deliverability of lands within the existing built-up footprints. Availability of lands adjacent to existing enterprise/employment areas
- Ease of access on the national road/rail network • Extent to which sustainable modes of travel can be encouraged (rail freight, port) or public transport).
- Accessibility and influence in a regional/sub-regional/county context.
- Environmental and infrastructural constraints.
- The appropriate density and scale of development relative to the settlement and location.
- Availability of SMART technology /broadband etc

Section 9.6.1 of the Draft Plan relates to economic development land use zoning including objectives KCDP 9-19, KCDP 9-20 and KCDP 9-21.

Objective KCDP 9-6 insert text in bold -

Engage and collaborate with Regional Partners **[including the Regional Skills Forum South-West]**, Local Authorities, Third Level Education Sector 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.

New objective: 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.

Objective KCDP 9-34 insert text – Support existing companies, such as those in the manufacturing, fin-tech, and agri-food sectors, and promote new and emerging business opportunities across all economic sectors within the County supported by the Southern Regional Assembly's Regional Approach to Smart Specialisation and forthcoming Smart Southern Region Definition and Framework.

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.

New objective: During the lifetime of the Plan, Kerry County Council seeks to prepare a Renewable Energy Strategy for the County inclusive of targets across renewable energy sources, including the potential for offshore renewables, bioenergy, solar etc

Summary	Response
<p>The submission from the Office of Public Works (OPW) had the following comments and suggested additions to the County Development plan;</p> <p>Justification Tests The OPW welcomes the inclusion of Plan-making Justification Tests supplied in the SFRA. However, proposed land use zones, some of which are classified as highly vulnerable development in the Guidelines are shown within Flood Zones A and B in the settlement zoning maps. Examples of these are detailed in the Comments on ‘Specific Settlements’ section.</p> <p>Comments on Specific Settlements</p> <p><u>Tralee</u></p> <p>The OPW welcomes objective TR23 regarding the protection of floodplains and wetlands in Tralee. It states that specific objectives might be included in the plan to ensure development in zoned areas is restricted to minor development, and to support the requirement for an SSFRA.</p> <p>An Objective should be included in the Plan to ensure that only water compatible development is permitted in areas of flood risk.</p> <p>It states that for New Residential zoned land R1.6.2, and R1.6.3 the mitigation measures suggested in part three of the Justification Test are compensatory storage. This is mitigation of flood risk elsewhere caused by a loss of storage due to development or land raising in flood risk area, rather than alleviation of flood risk to the site itself.</p> <p><u>Killarney</u></p> <p>The OPW welcomes objectives KA27-28 and KA31-32 regarding sustainable development, the integration of natural watercourses into development proposals, protection of floodplains and wetlands and the implementation of the Guidelines.</p> <p><u>Listowel</u></p> <p>The OPW welcomes objectives LIS22 and 24 regarding protection of floodplains and the implementation of the Guidelines.</p> <p><u>Tarbert/Ballylongford</u></p>	<p>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:</p> <p>(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.</p> <p>(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-</p> <p>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 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</p>

<p>While the discussion on Tarbert/Ballylongford Strategic Development Location states that undeveloped areas in Flood Zone A and B due to coastal flooding would be suitable for water compatible and less vulnerable usage respectively, it requests specific mitigation measures proposed, other than the requirement for an SSFRA for development management.</p>	<p>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>Flood Zone Mapping</p>	<p>It is necessary to include a new objective to ensure that only water compatible development is permitted in areas of flood risk. This new objective will be applicable to all those areas that are located within a flood Zone A and Less Vulnerable in Flood Zone B (namely those specified for 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.)</p>
<p>The submission notes the flood zone mapping provided in the relevant town plans and in the interactive GIS mapping. It requests that The Planning Authority should use all datasets available to them to produce combined Flood Zone A and B mapping. It would be beneficial if this mapping were overlaid on land use 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 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>Justification Tests</p>	<p>It is considered necessary to include additional mitigation measures for existing development in areas zoned Town Centre ((M2), Built Up Area (M4), Existing Residential (R2), and Tourism & Related zoned lands C5.1, C5.3 and C5.4. Applications for any future development in these areas shall be considered in accordance with Section 5.28 of the Guidelines, and that a Site Specific Flood Risk Assessment (SSFRA) will be required. Specific objectives shall be included in the plan to ensure development in these areas is restricted to minor development as defined therein, and to support the requirement for an SSFRA.</p>
<p>The OPW welcomes the inclusion of Plan-making Justification Tests supplied in the SFRA. However, proposed land use zones, some of which are classified as highly vulnerable development in the Guidelines are shown within Flood Zones A and B in the settlement zoning maps. Clarity is required in relation to the existing uses and potential redevelopment of these sites with regard to the Guidelines, The planning System and flood risk management.</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 9(see also response to KE-C1-365).</p>
	<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.</p>
	<p>Cleveragh; 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).</p>
	<p>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>

Flood Relief Schemes

The OPW welcomes objective KCDP11-66 to support investment in the delivery of Flood Relief Schemes, and town objectives TR23, KA33 and LIS24 regarding support for and facilitation of the construction of schemes in Tralee, Killarney and Listowel. It should be noted that there are also schemes planned in Kenmare, Ballylongford, Castleisland & Tullig, and Dingle. The OPW requests that Kerry County Council has 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, and that a specific objective in this regard is included in the Draft Plan. Kerry County Council might also consider including a register of key flood risk infrastructure in the County Development Plan where it would not otherwise be readily identified or protected from interference or removal.

Arterial Drainage Schemes and Drainage Districts

No commentary has been provided on the Arterial Drainage Schemes or Drainage Districts in county Kerry. Consideration should be given in zoning land for development to ensure that access requirements are preserved for the maintenance of Arterial Drainage Schemes and Drainage Districts. 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. The location of Arterial Drainage Schemes and Drainage Districts may be viewed on www.floodinfo.ie.

SFRA Key Requirements

Section 6.4 of the SFRA sets out a summary of “key requirements for acceptable flood management of all development in County Kerry”. It would be beneficial if these requirements were incorporated into the development plan as policy objectives.

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, and it is considered prudent to include an additional objective regarding this.

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.

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.

The findings of the SFRA have been incorporated into the landuse zoning and policies.

Recommendations

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.**

Amend the zoning from R1 (proposed residential) to P1 (agriculture) , **see map in Appendix.**

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.

Include a new objective 11-66b Ensure that access requirements are preserved for the maintenance of Arterial Drainage Schemes and Drainage Districts

Include new objectives for following specific sites and indicate these on the maps;

Tralee

TR114- (C5.2) ; Ensure that only water compatible development is permitted

TR115- (C5.4); Ensure that less vulnerable development and water compatible development only is permitted with suitable mitigation measures

TR116-(C5.5I); Ensure that less vulnerable development and water compatible development only is permitted with suitable mitigation measures

TR117- (M1.)1 Ensure that less vulnerable development and water compatible development only is permitted with suitable mitigation measures

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.

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.

KA85- (R1.6) Ensure that highly vulnerable development is not permitted in areas identified in Flood Zone A and B.

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.

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.

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.

LIS; 99-(C5.1) Ensure that only water compatible development is permitted.

LIS-100-(C2.1.1) Site specific flood risk assessment shall be submitted with any application.

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.

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.

Additional text to be added to Section 11-5 “full regard to the scheme to ensure proposal support and do not impede”

Amend Objective KCDP 11-61 – include benefiting lands and maintaining access for OPW.

KE-C1-145 Kerry PPN

Summary	Response
<p>Welcomes actions on climate change.</p> <p>Requests stronger reference to engagement with organisations [e.g., PPN]. Strengthening importance/potential of bio-economy. Welcomes inclusion of ‘micro generation’.</p> <p>Chapter 3 – Merits of the ‘Kerry Hub and knowledge Triangle’ questioned given Kerry’s relatively poor demographic performance. Housing targets don’t reflect local evidence, Cahersiveen is smaller than allocation to Milltown. Ballyduff should be upgraded from village to district town.</p> <p>Welcomes commitment to pursuing town centre first approach. Calls for the immediate publication of the Dingle Town Health Check. Suggests greater inclusion of placemaking, accessibility, liveability, quality of life. Recommends expansion of KCDP 4-21 to include social economy and community enterprise. KCDP 4-37 should include ‘and village’. Include Listowel in Objectives KCDP 4-53 to 4-55. Doesn’t support linking retail functions to town size.</p> <p>Stating 8% of the population is employed in the agriculture, forestry and fishing sector and ‘relatively low employment’ is inaccurate. Objective KCDP 5-6 ought to refer to the ecological functions (in addition to food supply) performed by rural areas. KCC and other stakeholders ought to be developing nature-based wastewater treatment systems (e.g., reed beds), which would also double-up as biodiversity and recreational spaces. KDCP 5-13 does not recognise other rural-based workers and reference to ‘full-time’ farmers is outdated. Policies on holiday homes welcomed. Condition that a roof be intact for restoration is problematic.</p>	<p>The support in relation to climate action is welcomed.</p> <p>The PPN is recognised as a key stakeholder in the preparation of the County Development Plan and the comments and suggestions are welcomed. Kerry County Council recognise the importance of the bio-economy, particularly given the current climate crisis. There are several references to this through the Plan including Chapter 2 and Chapter 9, set out in Section 9.3, with specific objective KCDP 9-3.</p> <p>It is not considered necessary to include a legend in Map 3.1 as it is annotated but the map will be amended to show the N22. In relation to the Core Strategy, the population allocations are in line with national policy and have been assigned to promote the sustainable and compact growth of the county. Ballyduff cannot be upgrade to a District Town as it does not meet the criteria for such a designation.</p> <p>Objectives KCDP 4-22 to 4-34 relate to towns and villages, but it is not deemed appropriate to include rural areas as this would not be in line with sustainable development and compact growth. It is not considered necessary to expand the wording of KCDP 4-21 as ‘activity’ within existing towns and villages covers a multitude. Listowel is a regional town and therefore it is not appropriate to include Listowel in Objectives KCDP 4-53 to 4-55, as these relate to the key towns of Tralee and Killarney.</p> <p>Whilst the submission states that the statistics outlined in relation to agricultural employment are inaccurate, this data was taken from the CSO 2016 and is therefore considered to be reliable. It is not considered necessary to include additional wording in Objective KCDP 5-6 as landscape value is taken to include ecological functions. The proposed wording amendments to paragraph 5.4 are considered unnecessary.</p>

Welcome principles in respect of sustainable communities and the recognition of the PPN's role in awareness raising, real authentic community participation and engagement. The model (Fig. 6.1) should be replaced with more contemporary thinking and evidence in respect of sustainable communities. Objective KCDP 6-1 needs to be amended, so the words 'in partnership with communities' are inserted immediately after the word 'support'. Recommend adding 'green spaces' to the list of amenities listed in Objective KCDP 6-3.

Recommend expanding Objective KCDP 6-9, so that it goes beyond the delivery of infrastructure and services – to 'the co-development and co-delivery of responses that meet the needs of communities (geographical and issue-based) particularly those who are most affected by social exclusion or other manifestations of disadvantage.'

The objectives presented in section 6.2.1 are laudable, but Kerry County Council needs to list other economic drivers (not just 'digital hubs') e.g. offices of public bodies (in line with Chapter 4). It also needs to provide for enhanced public transport nodes and connections.

Strategic Objectives 6-19 to 6-22 ought to be modernised with reference to the opportunities associated with smart villages and smart regions.

Eliminating homelessness & Traveller accommodation provision require targets & indicators.

Promotion of Irish language, the Gaeltacht needs work with full set of agencies and actors with which Gaeltacht communities interact.

Kerry County Council recognise and support farm diversification, in relation to objective KDCP 5-13 this has been amended in light of submissions received on the Draft Plan, see response to Submission C1-KE-365.

The submission states that there needs to be a stronger commitment to Objective KCDP 5-20, however every planning application is assessed to ensure compliance with the Rural Kerry Design Guidelines 2009.

The submission states that Figure 6.1 should be replaced with more contemporary thinking and evidence in respect of sustainable communities, whilst this is taken from Egan's wheel on sustainability and quality of life (2004), it has been amended to be in line with the vision for the development of the County.

The submission recommended adding 'green spaces' to the list of amenities listed in Objective KCDP 6-3, however community facilities is referenced in the objective and this is deemed to be sufficient.

The submission seeks a wording amendment to Objective KCDP 6-9 but it is not considered appropriate to include 'co-development and co-delivery' as KCC will not be the provider of infrastructure and services in all instances.

There are already objectives relating to public transport nodes and connections contained within the draft plan, particularly in Chapter 14 Connectivity.

The Draft Plan is supportive of the concept of smart towns as demonstrated at and therefore it is not considered necessary to include references to smart villages and smart regions in Objectives 6-19 to 6-22. It is not considered necessary to include any other proposed amendments in relation to Chapter 6 as any points raised have been addressed throughout the plan.

In relation to Objective KCDP 7-12 the timescale is outlined as 2030 as stated by the Housing for All objective. Consultation with people with disabilities, older people and the Travelling community would be more appropriate at Municipal District level and through the review of the Traveller Accommodation Programme.

The plan contains housing policies in order to assist local people in obtaining planning permission as set out in Chapter 5.

Fails to mention the Local Enterprise Office (LEO) and LEADER. Section 9.2.3.1 does not mention the PPN and/or community and/or voluntary groups. Section 9.2.3.1.1 should refer to a review of the next LECP. Section 9.6 needs to refer to the National Landscape Strategy and the Shannon Area Coastal Network. The realisation of town centre first objectives requires incentivising student accommodation over commercial premises in town centres. KCDP 9-34 needs to include the hospitality sector. Section 9.7.3 ought to include the creative and arts sector. Only one Digital Hub is in North Kerry.

Recommend the inclusion of NGOs and the PPN in KCDP 10-3.

The submission states that support for LEADER and the work of local development companies ought to be stated in relation to the development of the rural economy. However, LEADER is already listed in Section 9.7.3.1 Capital and Social Investment in the Rural Economy as a collaborator with KCC in delivering projects in rural areas.

The submission highlights that the chapter fails to mention the Local Enterprise Office (LEO), although it offers valuable supports to businesses. Therefore, the LEO will be included in the list of collaborators set out under Section 9.7.3.1.

The submission states that Section 9.2.3.1 lists KCC's partners in respect of economic development. This listing includes 'community development agencies', but it does not mention the PPN and / or community and / or voluntary groups. It is acknowledged that this section does not reference the PPN and it is recommended that this is amended. It is not considered necessary to include community/voluntary groups as these are included under community development agencies

The submission states that Section 9.6 needs to refer to the National Landscape Strategy and the Shannon Area Coastal Network. It is not considered necessary to include the NLS in the economic development chapter and The Shannon Area Coastal Network is referenced in Section 9.4.2 and Objective KCDP 9-8.

The submission states realisation of town centre first objectives requires incentivising student accommodation over commercial premises in town centres. The Plan contains incentives in relation to living over the shop and this could be used for student accommodation.

KCDP 9-34 does not include the hospitality sector as this is more related to Chapter 10 Tourism which sets out support for sustainable tourism jobs

The submissions states that objectives presented in respect of natural resources (9.7.6.2) must include commitments to 'conserve' and 'protect'. The objectives within the section state that there must be 'no significant adverse effects on the local community'. Furthermore Chapter 11 provides for the conservation and protection of the environment.

Section 9.7.3 includes 'creative sectors' and therefore it is not considered necessary to include the proposed wording amendments of 'the creative and arts sector'.

It is considered that as digital connectivity increases in the county that more digital hubs will be created.

Section 11.1 should refer to bogs in relation to environmental assets. KCDP 11-11 ought to include Cork County Council, as the biosphere bounds County Cork. KCC should commit to preventing installation of LED lights given detrimental impacts on biodiversity. Commitments in respect of landscape protection are welcomed.

Include an objective to ensure the undergrounding of electricity cables to the greatest extent possible.

Welcome commitment to waste minimisation and recommend education & community sectors added to the partners mentioned. Objectives set out in relation to water quality/protection ought to acknowledge the importance of working collaboratively with stakeholders, particularly farmers and other businesses.

Table 14.3 is very specific in respect of roads projects, but same detail not provided for active/sustainable travel/public transport. Section 14.4.3 ought to commit to supporting free parking at train and bus stations for public transport passengers. States only one objective (14-41) in relation to public transport, and it has eight (14-23 to 14-26 and 14-32 to 14-35) relating to roads. Commitments in respect of rail are welcome, but they need to be expanded by ensuring increased frequency. KCDP 14-42 should also use the word 'facilitate' in relation to the development of the rail network. KCDP 14-44 should insert the word 'and /' before 'or', so as not to close off the possibility of re-opening any part of the rail network. The Dingle / Corca Dhuibhne Smart Village strategy merits support.

Objective KCDP 11-11 includes 'other partners' and therefore it is not considered necessary to include Cork County Council.

In relation to Section 11.3 guidance and standards in relation to the provision of lighting are set out in the development management standards contained in Volume 6.

The Draft Plan recognises that all stakeholders have an important role to play in environmental conservation and are committed to providing support where necessary.

Chapter 12 contains an objective in relation to the undergrounding of electricity cables [KCDP 12-8].

The reference to agencies in the opening paragraphs relates to the provision of key infrastructure and therefore it would not be appropriate to include community and education sectors in this wording.

It is not considered necessary to amend KCDP 13-29 to specify North Kerry as the objective relates to the entire county.

Kerry County Council is committed to promoting and supporting sustainable travel and policies and objectives contained in Chapter 14 reflects this ambition. The Council will also facilitate and support the development of Transport Mobility Plans for Tralee, Killarney and Listowel and the subsequent rollout of Active Travel related infrastructure in these towns

Map 14.3 is an indicative map of some of the tourist routes within the county and therefore does not require an amendment.

Free parking at transport hubs is something which would be better addressed at Municipal District level.

The submission states that there is only one objective in relation to public transport, however the majority of objectives within Chapter 14 relate to sustainable transport,

Insertion of the word 'facilitate' in relation to Objective KCDP 14-42 will not be included as the development of the rail network is not under the remit of the Local Authority.

Recommendations

It is recommended that the spelling of Uíbh Ráthach corrected on Map 8.1.

It is recommended that Section 8.1.4.4 should reference Dingle's Smart Village status

Section 9.2.3.1.1 refers to a review of the LECP 2016-2016. It is recommended that this text be corrected to refer to a review of the next LECP.

It is recommended that NGOs and the PPN are included in KCDP 10-3.

It is recommended that Section 11.1 (in relation to environmental assets) also refers to Kerry's bogs.

KE-C1-232 Department of Housing, Local Government and Heritage	
<p>Summary</p> <p>The submission is in two parts the NPWS and the Built heritage (archaeology)</p> <p>The submission notes that the wording of the text and objectives that the plan has been thoroughly reviewed from the perspective of impacts on the natural environment.</p> <p>Notwithstanding this, the Department expresses serious concerns re wind energy repowering as referred to in the draft plan with from a Hen Harrier / Habitats Directive point of view, which needs to be addressed otherwise adverse effects of the plan on a European site cannot be ruled out. The Department outline that many of the proposed wind energy repowering areas overlap with Special Protection Area (SPA) designations (e.g. the Stack's to Mullaghareirk Mountains, Athea Hills and Mount Eagle Area SPA) (see wind-zoning map in Appendix A3) and that despite the qualifications contained in the plan, it facilitates the continuation of developments within the designated area(s) which did not originally have what would be now considered to be a legally acceptable assessment.</p>	<p>Response</p> <p>The acknowledgement from the Department / NPWS, that the plan has been thoroughly reviewed regarding impacts on nature conservation is welcomed. Regarding the Wind Energy repowering proposals, the Department's core concern is that the plan would facilitate the continuation of developments within designated area(s) for Hen Harrier, which did not originally have what would be now considered to be a legally acceptable (Habitats Directive) assessment.</p> <p>It is considered that it would be unreasonable to exclude consideration of repowering proposals within the SPA at plan level. It is noted that many of the turbines in place within the SPA were permitted prior to the publication of the SPA designation in November 2007 and that the planning permissions for some are not time limited. In addition, repowering proposals are likely to differ from new applications in so far as they may be able to avail of the existing infrastructure and accordingly <i>may</i> not result in direct habitat loss of value within Hen Harrier SPAs. It is therefore considered that repowering proposals in the SPA should be open to consideration and assessed on a case-by-case basis.</p> <p>The plan, therefore, facilitates an appropriate consideration of the continuation of such developments within designated area(s) for Hen Harrier rather than necessarily the continuation of such developments. It provides a framework within which such application will be considered, including requirements to comply with the Habitats Directive. Section 12.5.4.1.7 of Volume one makes it clear that such applications will be dealt with on a case-by-case basis in accordance with best practice environmental standards and compliance with Article 6 of the Habitats Directive and also makes specific reference to the European Union Court of Justice (CJEU) Case C-164/17. In addition, explicit Hen Harrier related qualifications are set out in Development Objectives KCDP12-16 and KCDP12-17 of the draft plan.</p>

<p>County Kerry Tourism Strategy & Action Plan to be screened for Habitats Directive is not done so previously.</p> <p>With respect to Development Objective 13-15 the Department highlight that there was a considerable impact on Lough Leane, and in particular Ross Bay, after the summer drought of 2018, very probably due to the lack of dilution and flushing of wastewater discharges during the summer peak in tourist activity. It is therefore suggested that a further objective could be added with the following type of wording: “Facilitate and support Irish Water in developing solutions to the impacts of wastewater discharges to Lough Leane during summer droughts.”</p> <p>Killarney and Tralee zonings: In zoning map D for Killarney and zoning map E for Tralee, proposed indicative roads including those proposed to cross the River Flesk to be shown with a dashed broken line as opposed to a solid line to better indicate their pre-assessment status.</p> <p>Regarding the renovation of derelict sites, it is recommended that where feasible, the retention of features used by wildlife such as owls, swifts and bats, or their appropriate replacement where permissible, should be considered during the renovation of derelict buildings which contain these features</p> <p>Recommends inclusion of Special Areas of Conservation and Special Protection Areas within development objective 11-2.</p> <p>Recommends inclusion of the word sustainable, at appropriate locations and subject to preliminary / full environmental assessment within various objectives of the plan in order to ensure compliance with Habitats, Birds and Environmental Impact Assessment (EIA) Directives</p>	<p>Notwithstanding the above, in light of the concerns raised, it is recommended that Section 12.5.4.1.7 be amended to more clearly outline that the likely impact on Hen Harrier population health within the SPA, in relation to ‘Favourable Conservation Status’, will be a consideration of fundamental importance at project level assessment stage. It is also recommended, in the interests of clarity, that the portion of the repowering area located within the Hen Harrier SPA designation should be differentiated on the related maps.</p> <p>The Kerry Tourism Strategy & Action Plan was screened for AA as part of preparation process of that plan. Recommended wording additions to other objectives are generally considered to be acceptable and should be incorporated into the plan.</p> <p><u>Response to the submission’s suggestions for other objectives/polices in the CDP are as follows:</u></p> <ul style="list-style-type: none"> • Obj 11-2 – suggestion noted, text will be amended as outlined below, • Suggestion noted, <i>Section 4.3.4 Derelict and Vacant Sites</i> to be amended as outlined below, • Obj 9-41; 9-44; 9-73 –suggestion noted, text will be amended as outlined below, • Obj 9-5 – yes text is metaphorical and suggests “relying on or levering” the county’s natural assets as opposed to physically building on them, • Obj 10-3 & 10.5 typo noted and amended, • Obj 10-5, 10-6, 10-7, 10-34, 10-36, 10-37, 10-40, 10-41 suggestions noted, text will be amended as outlined below, • Obj 10-12 typo noted and amended, • Obj 12-3,12-13, 12-21–suggestions noted, texts will be amended as outlined below, • Obj 12.23 – noted however the objective specifically refers to the publication as a reference document. The document was published by the (then) Central and Regional Fisheries Board, and this is the name that appears on the reference document. The objective reflects same. • Obj 13-15, comments noted. Killarney town development plan however outlines the specific policy for Killarney town and its infrastructure. It is considered the suggested amendment to text is best placed in the Killarney Town Development Plan, which will be amended as outlined below, • Obj 14.2 – suggestion noted, however the term “subject to environmental assessment” has been used throughout the CDP. The term implies compliance with various environmental legislation notably the SEA, EIA, Habitats and Water Framework Directives. The word “full” is considered arbitrary. It has no
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meaning under the provisions of the above Directives as transposed in National legislation particularly in the context of the Planning and Development Act and Regulations, as amended.

- Obj 14-35, 14-56 –suggestions noted, text will be amended as outlined below.

Response to the submission’s suggestions for the Killarney Town Development Plan are as follows:

- Comments re-new bridge crossing and crossing of the Flesk at Coolclogher are noted, Map D will be amended as outlined below,
- Obj KA51–suggestions noted, text will be amended as outlined below,
- Comments in relation to K4 and KA61, noted, KA61 will be amended as outlined below to avoid confusion,
- Comments in relation to KA12 noted, however there is no “improve” in the objective and it is not clear if this is the objective being referred to in the Department’s submission.

Response to the submission’s suggestions for the Listowel Town Development Plan are as follows:

- Lis36 – Comments are noted. However, the objective relates to a “masterplan/design brief”. As such any future masterplan as a plan/programme will fall within the scope of the SEA and/or the EIA Directive (and Habitat Directive), as applicable. As such the LA is already legislatively obliged to ensure compliance with the Directives in this regard. The terminology referred to the submission “further to preliminary environmental assessment” therefore has no particular meaning within the context of the SEA and/or EIA Directives as transposed into Irish legislation. Therefore the proposed additional text is not deemed necessary due to its lack of specific meaning in the context of the above Directives and may add confusion. However, it is considered relevant to amend text in Section 3.5.3 for clarification as outlined below. Finally, it is noted that the objective is already qualified by adherence to the conservation objectives of the Lower Shannon SAC i.e. an assessment under the Habitats Directive. Again, it is noted that in the context of the provisions of the Habitats Directive, the terminology of “preliminary environmental assessment” does not have a specific meaning.

Response to the submission’s suggestions for Tralee Town Development Plan are as follows:

- Comments re-old railway line at Ballyard are noted, Map E will be amended as outlined below.
- Obj TR103–suggestions noted, text will be amended as outlined below

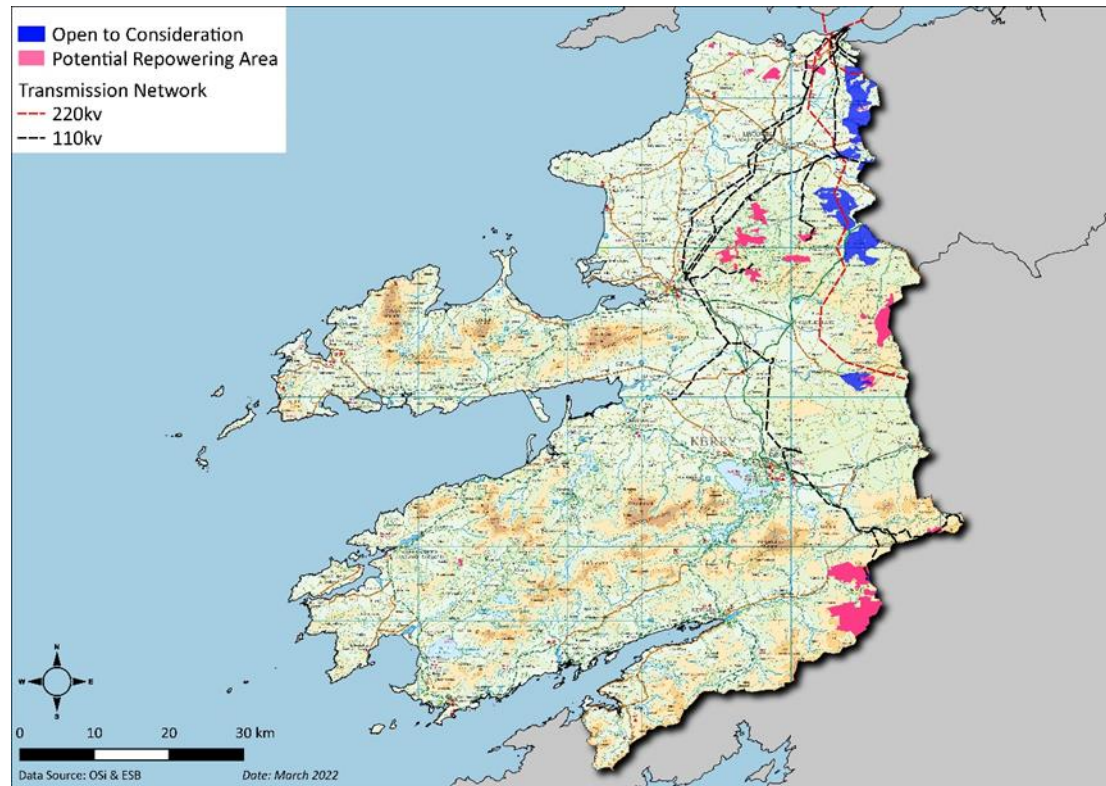
A number of suggestions and amendments are included. It is considered acceptable to include these amendments see below.

Archaeology

The submission contains several observations and recommendations all of which have been taken into consideration. The submission commends the Draft Plan as forward-thinking by virtue of its inclusion of several objectives, for example, its protection of nineteen significant archaeological landscapes within the county (section 8.3.2) and later historic landscapes etc.

Recommendations

Amend Wind Zoning Maps (Map 12.4 Volume one and Section 5 Volume 4)



Amend wording of Section 12.5.4.1.7 as follows:

As wind turbine technology continues to advance, existing windfarms and sites developed today have the potential to greatly increase efficiency and capacity by upgrading older turbines with more efficient technology or their replacement with larger capacity turbines in the future. ~~It is noted that in some cases the existing windfarms in the repower area predate the~~

~~European Site designation.~~ For the purposes of this plan and related development objectives, repowering includes wind farm upgrades, renewal, repowering or extension to permitted operational duration.

Within the Wind Energy Zoning maps accompanying this plan potential repowering areas have been identified, some of which are located within the Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA, known locally as the Hen Harrier SPA. This plan should not be construed as one which facilitates repowering within the Hen Harrier SPA without a legally acceptable Habitats Directive Assessment. But rather is one which facilitates the careful consideration of such proposals on a case-by-case basis, in accordance with the requirements of the Habitats Directive and the proper planning and sustainable development of the area. As part of this, impact on Hen Harrier population health within the SPA, in relation to 'Favourable Conservation Status', will be a fundamental consideration.

Repowering proposals differ from new applications in so far as they may be able to avail of the existing infrastructure and accordingly may not result in direct habitat loss of value within Hen Harrier SPAs. It is further noted that some windfarms in the SPA predate the European Site designation. Nonetheless, repowering proposals may still require grid upgrade works and / or transport upgrade works if taller turbines with greater capacity are proposed. In addition, displacement effects resulting from the unavailability of otherwise suitable habitat may still arise, as may disturbance risks (particularly during the construction stage) and collision risks (at the operational stage).

Given the outcome of the European Union Court of Justice (CJEU) Case C-164/17, wind farms in/adjacent to SPAs designated for Breeding Hen Harrier, when applying for repowering will require the submission of a Natura Impact Statement (NIS) that is informed by this judgement. ~~This will include upgrades, renewal, repowering or extension of existing planning permissions, for wind farms.~~ The EU Commission notice 2021/C 437/01 regarding alternative solutions and compensatory measures should also be taken into account, as appropriate. This notice outlines that *'those measures which are not functionally part of the project, such as habitat improvement and restoration (even if contributing to a net increase of the habitat area within the affected European site) or creation and improvement of breeding or resting places for the species, should not be considered as mitigation as they do not reduce negative impact of the project as such. Such types of measures, if they are outside the normal practice required for the conservation of the site, meet rather the criteria for compensatory measures'*. Proposals requiring such compensatory measures are required to be assessed within the context of Article 6(4) of the Habitats Directive, which also requires consideration of alternative solutions and imperative reasons of overriding public interest.

In summary, repowering of existing wind energy developments ~~may be considered~~ within the potential repowering zoning and which are within or adjacent to European sites will be open to consideration. These applications will be dealt with, on a case-by-case basis, in accordance with best practice environmental standards and compliance with Article 6 of the Habitats Directive and the proper planning and sustainable development of the area.

Amend Objective KCDP 12-16 (a) Facilitate the sustainable replacement of turbines or repower energy projects in areas shown as 'Repowering areas', Potential Repowering Area with Hen Harrier SPA' and areas 'Open-to-Consideration'. Such proposals will be required to comply with Article 6 of the Habitats Directive.

The following to be added to Objective 11-2: European sites

"Maintain the ... integrity of Special Areas of Conservation, Special Protection Areas, Natural Heritage Areas ..."

The following to be added to Volume 1, S4.3.4 Derelict and Vacant Properties

Derelict properties may be used as homes for wildlife such as swifts, bats and barn owls. In many cases these will be protected by law, and a NPWS derogation licence will be needed for their conversion. Where feasible, the retention of features used by such wildlife, or their appropriate replacement where permissible, should be considered during the renovation of derelict buildings which contain these features.

The following to be Development Objective to be added to KCDP Volume 1 S4.3 Active Land Management

It is an objective of the Council to take into consideration the potential for impact on wildlife as part of derelict site renovation proposals, as outlined in S4.3.4 of this plan.

The following to be added to Development Objectives KCDP 10-28 and 10-65

As part of this, potential for impact on wildlife should be taken into account as outlined in S4.3.4 of this plan.

The following amendments to be made to Volume 1 Development Objectives

Insert the word “sustainable” into the following objectives; 9-41,9-44., 9-73, 10-5, 10-6, 10-7, 10-41, 12-3, 12-29 14-35, 15-56 (delete below)

Objective 9-5: Investment location: “building on its high quality of life and outstanding natural environment”

Objectives 10-1 and 10-5: Tourism development: Amend ‘National Parks and Wildlife Services’ to ‘National Parks and Wildlife Service’.

Objective 10-12: Wild Atlantic Way: Amend ‘location’ to ‘locations’

Objective 10-34: Linked pedestrian/cycle network: The addition of “subject to ...” referring to wording on environmental, heritage, and/or normal planning constraints.

Objective 10-36, 10-37: Connections of Ways/MacGillycuddy’s Reeks: “...ensuring that there will be no significant adverse effects ... “

Objective 10-40: Greenways: “Support and facilitate the sustainable development of new greenways at appropriate locations..., and subject to environmental assessment”

Objective 12-13: Replacement of “environmental studies” with “environmental assessment.”

Objective 12-21: Inclusion of the clause “including of the electricity connections” at the end of the sentence.

Objective 12-23: Replacement of ‘The Central and Regional Fisheries Boards’ with ‘Inland Fisheries Ireland’.

Objective 14.2: Insertion of “... support the sustainable establishment of a network of greenways ... further to full environmental assessment ...”

The following amendments to be made to Volume 2 Town Development Plans

Tralee Town Plan

Tralee Town Plan maps: Indicative roads to be amended to be represented by a broken rather than a solid line

Tralee objective TR103 to be amended as follows:- “Facilitate the sustainable development of ...”

Killarney Town Plan

Killarney Town Plan maps: Indicative roads to be amended to be represented by a broken rather than a solid line

Killarney objective KA51: “Facilitate and support the sustainable delivery of ...”

Killarney objective KA61 Strengthen and promote a sustainable relationship between and connectivity of Killarney Town as integral to the and Killarney National Park.

Killarney objective KA12: Comma to be provided after “Improve”; also “subject to full environmental assessment” to be added...

The following Development Objective to be added to KCDP Volume 2 Killarney Town Plan Section 2.3.3 Killarney National Park. It is an objective of the Council to facilitate and support Irish Water in developing solutions to the impacts of wastewater discharges to Lough Leane during summer droughts.

Listowel Town Plan

Listowel Objective LIS36: Castleinch tourism development zoning to be amended as follows:- “Require the preparation of masterplans/design briefs and preliminary environmental assessments...”

In relation to the County Kerry Tourism Strategy & Action Plan 2016-2022, the plan was screened for significant effects on European Sites, prior to its adoption. No significant effects were identified and an appropriate assessment was not required as detailed in the *County Kerry Tourism Strategy and Action Plan 2016-2022, Habitat Directive Assessment, in Accordance with the Requirements of Article 6 of the EU Habitats Directive 92/43/EEC, September 2016.*

- 11-2 Maintain the nature conservation value and integrity of Special Areas of Conservation, Special Protection Areas, Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs). This shall include any other sites that may be designated at national level during the lifetime of the plan in co-operation with relevant state agencies.
- Section 4.3.4, add the following to the last sentence: The Plan acknowledges that derelict houses are frequently used as homes for wildlife such as swifts, bats and barn owls. In many cases these will be protected by law, and a licence will be needed for their conversion. Where feasible, the retention of features used by such wildlife, or their appropriate replacement where permissible, should be considered during the renovation of derelict buildings which contain these features.

Proposed Amendments to Killarney Town Plan

- Add new objective after KA11: "Facilitate and support Irish Water in developing solutions to the impacts of wastewater discharges to Lough Leane during summer droughts."
- Map D (Killarney zoning map) amend drawing to show the bridge crossing of the River Flesk proposed to link the N71 to the N22 as a broken green line to reflect its pre-assessment status. Similarly, the indicative road crossing the Flesk at Coolclogher to be amended to a broken line.
- KA51: "Facilitate and support the sustainable delivery of ..."
- KA61: Strengthen and promote a sustainable relationship and connectivity of between Killarney Town as integral to and the Killarney National Park.

Proposed Amendments to Listowel Town Plan

- Amend Section 3.5.3 Castleinch as follows:
The council will require the preparation of a masterplan/design brief where appropriate prior to the redevelopment of the Castleinch lands for the development of a landmark riverfront site in a sustainable manner, providing new mixed use/ tourist facilities subject to a flood risk assessment in accordance with 'The Planning systems and Flood Risk Management - Guidelines for Planning Authorities', compatibility with the conservation objectives of the Lower River Shannon SAC, and a traffic impact assessment and any other environmental assessment deemed necessary under the SEA and/or EIA Directives.

Proposed Amendments to the Tralee Town Plan

- Map E (Tralee zoning map) amend drawing to show a broke blue line on the old railway line in to indicate its indicate and pre-assessment status.
- TR103: "Facilitate the sustainable development of ..."

Archaeology

Insert the following into section 8.3.3

The protection of underwater cultural heritage in all its forms (which includes a range of features, including wrecks, remains of bridges and submerged, or partially submerged, coastal and riverine structures) is a core objective of Kerry County Council in relation to archaeological heritage. Logboats, such as the example from Derryco in the Cashen estuary, have also been previously recorded from the county's waterways.

A number of artefacts have been recovered from watercourses.

The Underwater Archaeology Unit (UAU) section of the Department of Housing, Local Government and Heritage is engaged in the compilation of an inventory of shipwrecks recorded in Irish waters, including the Kerry Coast. The Wreck Inventory of Ireland Database (WIID) includes all known wrecks over 100 years old and approximately 18,000 records have been compiled and integrated into the shipwreck database thus far. Wrecks 100 or more years old have full legal protection under the National Monuments Acts. They (along with archaeological objects) are automatically protected and generally do not feature in statutory listings (the Record of Monuments and Places and the Register of Historic Monuments). A total of 545 wrecks are recorded in the WIID from County Kerry. The National Monument Service's Wreck Viewer has been developed to facilitate easy access to the WIID. The Wreck Viewer displays only wrecks for which the Department has a recorded location (approx. 22% of total entries in the WIID). Of the wrecks listed for Ireland, most are without exact locations and the records of wrecking pertaining to them date from the 18th century or later. Many more previously unknown wrecks therefore await discovery in the coastal waters off Kerry, dating to earlier times but which went unrecorded when lost.

It is also considered acceptable to insert the following;

KCDP 8-22 (i) Secure the preservation in situ of all sites, features, **protected wrecks**Department of **Housing, Local Government and Heritage**, the National Museum of Ireland and the County Archaeologist.

(ii) Ensure that ... Archaeological Assessment (**including Underwater Archaeological Impact Assessment**) which (half hectare or more) or length (1km or more) **or include potential impacts on underwater cultural heritage** and development that requires an Environmental Impact Assessment.

KCDP 8-23 Ensure the protection and preservation of archaeological monuments, **wrecks** and features, (SMR) or **Wreck Inventory of Ireland Database and** such The National Monuments Service, Department of **Housing, Local Government and Heritage** and the County Archaeologist.

KCDP 8-24 Protect, preserve and promote thesub-tidal environments. **Where flood relief schemes are being undertaken the Council will have regard to the Archaeological Guidelines for Flood Relief Schemes (DHLGH and OPW 2021).**

KCDP 8-28 Protect and preserve the industrial, military, **maritime, riverine, lacustrine and** post-medieval archaeological assessment, **including, where appropriate, Underwater Archaeological Impact Assessment.**

KE-C1-279 Fáilte Ireland

Summary	Response
<p>The submission is generally supportive of the Draft Plan and notes that many of the suggestions included in the Issues Paper submission have been included in the Draft Plan. The submission welcomes the inclusion of a dedicated and focused Chapter on Tourism which has a good level of detail, and which is cross-referenced with many related chapters in the Plan such as retail, rural housing, culture and heritage, economic development among others. The submission is particularly supportive that underpinning the approach to tourism development is the concept of Sustainable Tourism. It welcomes reference to Fáilte Ireland, the Wild Atlantic Way, and Fáilte Ireland’s Destination and Experience Development Plans.</p> <p>Chapter 4 - The submission puts forward suggested text regarding the Purple Flag Award.</p> <p>Chapter 5 & Chapter 7 - The submission states that the plan should support where appropriate innovative solutions to support the provision of residential accommodation for seasonal tourism workers.</p>	<p>The support in relation to Chapter 10 is welcomed.</p> <p>The Purple Flag award is given to areas with a diverse mix of dining, entertainment and culture. Towns given this award must provide a safe, vibrant and varied night out. The plan recognizes the importance of all evening and night-time uses within the town Centre it is therefore acceptable to add in additional text as set out in the recommendations section.</p> <p>The supply of seasonal residential accommodation, especially in popular tourist destinations is acknowledged as a serious challenge in County Kerry. The Draft CDP outlines its policy regarding short term lettings under Section 10.3.5.3 Short-Term Letting. The letting of a property on a short-term basis is a material change of use of the property and requires planning permission. Planning applications for specific developments as referred to above will be considered on their own merits.</p>

<p>Chapter 8 - Regarding the Irish Language, the submission requests the inclusion of an additional bullet point in Section 8.1.3.1</p> <p>Section 8.1.4.4 - Dingle Peninsula 2030; The submission welcomes the support that the plan provides to the Dingle Peninsula 2030 project and proposes a new objective as follows: Facilitate and support the Dingle Peninsula 2030 initiative which includes the Energy master plan, Precision Farming, Marine-water Quality monitoring and Sustainable tourism & transport.</p> <p>Chapter 10 – the submission is largely supportive of the tourism policies and objectives as set out in the Draft Plan and proposes wording amendments to strengthen the chapter.</p> <p>Chapter 14 - Section 14.4.3- Parking Provision Suggested new Objective: Support and facilitate the sustainable provision of adequate public parking facilities for all users at identified loop walk trail heads and mountain trail heads, including at Mount Brandon trail head subject to compliance with any environmental designation requirements.</p> <p>Additional Text requested in Section 10.3.3 Kerry has a number of festivals including the ST. PATRICK’S FESTIVAL KILLARNEY, Rose of Tralee, Listowel Writers Week and Puck Fair in Killorglin, all of which attract visitors not only from all over Ireland but many also from abroad and make an important contribution to the local economy.</p> <p>Additional & Deletion of Text to Section 10.3.4: Facilitate and support the provision of tourist related facilities, such as information offices TOURIST INFORMATION CENTRES, SELF-SERVICE BROCHURE UNITS/KIOSKS and cultural centres, in town and village locations to support and strengthen the existing economic infrastructure of such centres.</p> <p>Additional & Deletion of Text to Section 10.3.4.3: “In this regard it is the policy of the council to support the provision of high-quality information for visitors, for example through local tourist offices TOURIST INFORMATION CENTRES, local and</p>	<p>Include a new objective: Facilitate the provision of seasonal accommodation for employees on the site of a tourism facility.</p> <p>Kerry County Council outlines its support for the preservation of the Irish Language under section 8.1.3. it is considered prudent to amend the objectives as set out in the recommendations section.</p> <p>Addition of a new objective under Section 8.1.4.4 is set out in the recommendations section.</p> <p>Amendments to be made to Chapter 10 as set out in the recommendations section.</p> <p>It is not considered necessary to include an additional objective relating to parking provision as Objective KCDP 10-12 relates to parking provision along the WAW and Objective 10-21 relates to the provision of parking at scenic viewing points and tourist facilities.</p> <p>Response – it is not considered appropriate to include St. Patrick’s Festival Killarney within this objective as there are several St.Patrick’s events in the County</p> <p>Response – it is not considered necessary to include the additional wording within this objective as information offices covered a broad range of tourist information venues.</p> <p>The council consider that the provision of improve tourist facilities to be vital, this includes the provision of self-service brochure units and information kiosks. It is considered appropriate to include an objective which seeks to facilitate the provision of these facilities.</p> <p>Response – it is not considered necessary to include the additional wording within this objective as information offices covered a broad range of tourist information venues</p>
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national websites, SELF-SERVICE BROCHURE UNITS/KIOSKS AND THE FRONTLINE OF TOURISM INCLUDING accommodation providers, and STAFF at attractions themselves and the broader community.”

Recommendations

Amend section 4.4.2.3 Evening and Late-Night Uses to read as follows:

A healthy night-time economy contributes greatly to the vitality and viability of a town centre. There is a need to ensure that adequate provision is made for evening and late-night activities such as theatre, arts, music, cafes, restaurants, public houses, taxi offices, hot food takeaways and other similar uses. A vibrant night-time economy brings many benefits including increased visitor numbers, passive surveillance, and the creation of a destination for artistic and cultural events. A number of towns and villages are already in receipt of the Purple Flag Award and the Council will work to achieve designation for additional towns and villages in the County.

Insert an additional bullet point under Section 8.1.3.1 – Irish Language Policies

- Promote and encourage the increased use of Irish in the accommodation, restaurant, retail, attractions and activity sectors.

Amend Objectives KCDP 8-9 and KCDP 8-10 to read as follows:

KCDP 8-9 Facilitate and promote in cooperation with Údarás na Gaeltachta, Fáilte Ireland and all other statutory development agencies, sustainable tourism development in the Gaeltacht areas of the County.

KCDP 8-10 Collaborate with Fáilte Ireland and Tourism Ireland to sustainably support and promote our Gaeltacht areas as key Irish Language Tourism destinations.

Add a new objective under section 8.1.4.4

KCDP 8-16 A Facilitate and support the Dingle Peninsula 2030 initiative which includes the Energy master plan, Precision Farming, Marine-water Quality monitoring and Sustainable tourism & transport.

Add a new objective; Facilitate the provision of seasonal accommodation for employee’s on the site of a tourism facility which will be wholly ancillary to the use of the tourism facility.

Amend Objective KCDP 10-8 to read as follows:

KCDP 10-8 Facilitate and support the implementation of the Wild Atlantic Way Tourism Plans, Fáilte Ireland Visitor /Destination Experience Development Plans, Heritage Town and Destination Town Plans and to support the continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these tourism plans.

Proposed Additional Text to Section 10.1 – the inclusion of the Beara Peninsula, part of which sits in Kerry as an important tourism location.

Add text to Section 10.1

Kerry boasts some of Ireland’s most iconic scenery including the Lakes of Killarney, the MacGillycuddy Reeks, the Dingle and Iveragh peninsulas and Valentia Island, Skellig Michael, the Sleah Head Drive, the Beara Peninsula, the pristine beaches of North Kerry and has the longest section of the Wild Atlantic Way.

Add text to Section 10.1.1 – Sustainable Tourism and Climate Action

Requests more explicit reference to sustainable transport.

- e-charging
- specific parking allocations for electric vehicles
- access restricted in certain areas to sustainable modes of transport
- reduced parking charges at publicly owned sites for low carbon/neutral transport modes
- provision of good quality and safe cycle lanes along many of the transit routes and access routes particularly between tourism towns, villages and attractions

Proposed Additional Text to Objective KCDP 10-12

- Addressing traffic and visitor management issues, with specific focus on integration of public transport timetabling to facilitate improved visitor dispersal, having regard to environmental sensitivities and designations in the area.

Additional Text to Objective KCDP 10-6

Promotehotels, aparthotels, guesthouses, bed and breakfasts, tourist hostels, caravan and camping, cafes, restaurants, visitor attractions and activity tourism. include additional objective; facilitate the provision of self-service brochure units and information kiosks facilities

Additional Text to Objective 10-22: Recognise the importance of universal accessibility to tourist services, facilities, and tourist sites and undertake enhancements to overall accessibility where appropriate in conjunction with key stakeholders and to ensure that information on these facilities are clearly promoted and publicised

Additional & Deletion of Text to Section 10.3.5: The Council supports the development of tourism throughout the county by encouraging the provision of a wide range of tourist accommodation types and will therefore direct new tourist accommodation including hotels, guesthouses, hostels, B&Bs and, holiday homes, glamping/camping/caravan and campervan sites to towns and villages with good spatial spread throughout the county.

Additional & Deletion of Text to Objective KCDP 10-40: Support and facilitate the development of new greenways, maintain and protect the functionality of existing greenways as key components of an overall green tourism infrastructure and as standalone tourism products in their own right.

KE-C1-309 Údarás na Gaeltachta

Summary

The submission sets out the background and the strategic role and responsibility the Údarás has in supporting language, economic and social development of the Gaeltacht areas for the past 40 years. The submissions states that the issues of language, economy, the community and the environment cannot be looked in isolation from each other if there is to be a sustainable Gaeltacht. It highlights that the Údarás has a new strategy in operation since their last submission to the Council in August 2020.

The submission highlights that in accordance with Census 2016, the Uíbh Ráthach Gaeltacht and Corca Dhuibhne Gaeltacht had a total combined population of 8,756, 6% of the Kerry population and 8.8% of the total Gaeltacht population. In 2021, 617 persons were employed full time in client companies of the Údarás in Kerry's Gaeltacht areas.

Chapter 1: recommends that on page 8 that Corca Dhuibhne/Castleisland should be set out on the map instead of Castleisland/Corca Dhuibhne and that that the Gaeltacht areas should be highlighted on this map.

Response

The contents of the submission are noted and welcomed. The Draft Plan recognizes the importance of the Irish Language and the Gaeltacht Areas and therefore a dedicated chapter [Chapter 8] has been set out in the Plan.

Map 1.1 identifies the five municipal districts of the County, for electoral and local government purposes. The Municipal District of Castleisland/Corca Dhuibhne in terms of its name is set, therefore no amendment proposed.

The Plan is supportive of locals who wish to live in the Gaeltacht Areas – see Chapter 5.

Chapter 3: The Údarás states that the Plan should focus on giving support to those who wish to settle in their native area, who wish to work, and raise their family in a Gaeltacht. The submission states that if there is no community in the Gaeltacht it will just be a place without the language.

Chapter 4: every effort should be made to preserve the character of the towns and villages of the Gaeltacht and that any development that is proposed should be measured.

Chapter 5: highlights the housing crisis in the Gaeltacht areas. The issue of holiday homes and houses not occupied on a permanent basis needs to be tackled. The submission states that specific policies are needed for the Gaeltacht areas to ensure that the language, culture and heritage is preserved. The submission highlights that there are currently a number of proposals looking at lands in the Gaeltacht for those seeking to reside there permanently.

Chapter 6: the submission states that much of the aims and targets of this chapter align with the Údarás' own European schemes currently running by them.

Chapter 8: the submission states that the *Straitéis 20 Bliain don Ghaeilge 2010-2030* is mentioned in the introduction to the Development Plan it should also be referred to Chapter 8 under section 8.1.1.

8.1 recommends that BSG Dhaingean Uí Chúis should be marked on the map and Baile Seirbhíse Gaeltachta instead of the English version. In both the English and Irish copy of the Development Plan it is stated that the wrong spelling of Uíbh Ráthach is made, this should be amended.

8.1.1.1 it is recommended to use the acronyms LPT and BSG instead of LPT and GST in the Irish version of the Development Plan.

8.1.2 make the following amendments to the table Corca Dhuibhne, Uíbh Ráthach or from the English version Ciarraí Thiar- West Kerry, Ciarraí Theas- South Kerry.

8.1.3: recommends that the importance of the opportunities to use Irish are actively available is referred to here.

Refer to Dhúchas an Daingin (the brand of the language plan for Daingean Uí Chúis) in the 3rd paragraph and under KCDP 8-6 and also refer to the support the Council will make available to the language planners in the two BSG towns outside of the Gaeltacht.

8.1.3.1: recommended to refer to the opportunity to use Irish as well as learning opportunities under Áiseanna/facilities.

8.1.3.2: recommend to raise the standard referred to here from B2 to B1.

The Chapter supports the sustainable development of existing towns and villages as set out in Objectives KCDP 4-2, KCDP 4-6 to KCDP 4-8.

Section 5.7 of the Plan relates to Holiday/Second Homes, with Objective KCDP 5-21 stating that they shall not be located in the rural landscape.

Also see response to similar issues raised in submissions numbers KE-C1-131, KE-C1-355, KE-C1-393 and KE-C1-342.

The comments in relation to Chapter 6 are welcomed and noted.

Some of the suggested amendments relating to Chapter 8 are set out in the recommendations below. **8.1.4.2**, it is considered that the national network of digital hubs Gaeltacht areas 'Gteic', providing space for enterprise, offices, and ancillary activities, has been adequately highlighted in the Draft Plan under section 8.1.4, no amendment proposed.

8.1.4.3: 2nd paragraph - Note the sentence Comharchumann Forbartha Chorca Dhuibhne Teo. in Baile an Fheirtéaraigh offer further economic opportunities for the area, is already inserted in Draft Plan.

It is considered appropriate to amend maps to show BSG Dhaingean Uí Chúis and Baile Seirbhíse Gaeltachta instead of the English version, to use correct acronyms LPT and BSG instead of LPT and GST in the Irish version of the Development Plan and to correct any small spelling mistakes.

The plan facilitates the opportunity to use Irish as well as learning opportunities.

Not an issue for the Plan.

KCDP 8-7: The following amendment is suggested: 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 **and sustain** the linguistic and cultural heritage of An Ghaeltacht **areas** including the promotion of Irish as the community language.

Is it requested to amend objective KCDP 8-8; to Raise the percentage from 66% to 75%

Under 8.1.4 &KCDP 8-13 & KCDP 8-14: amend under paragraph 3 the spelling of Údarás na Gaeltachta

Reference is made to the language plans and Gaeltacht service towns, the Údarás recommends that amending Gaeltachtaí to Gaeltacht areas

8.1.4.2, paragraph 2, include under this paragraph, a subheading entitled *An Gréasán Náisiúnta Gteic*. It is requested that details and a map in respect of the An Gréasán Náisiúnta Gteic as set out under section 3.0 of the submission be included in the C.D.P.

8.1.4.3: Include under the 2nd paragraph the following text: Comharchumann Forbartha Chorca Dhuibhne Teo. in Baile an Fheirtéaraigh offer further economic opportunities for the area.

Chapter 9, 11 & 12: the Údarás supports and agrees with the aims, targets and recommendations of these chapters and advice that they are available to support and co-operate with the stakeholders in the County to achieve the stated aims.

The suggested amendments to sections 8.1.3, 8.1.4 are considered acceptable, see recommendations below.

It is an aim of the plan to preserve the daily use of Irish in the settlements. It is envisaged that by reserving 75% of the dwelling units for Irish speakers that it is restricting the non-use of Irish. It is therefore not considered appropriate to raise the percentage from 66 to 75.

These amendments are acceptable see recommendation below.

In relation to Language Plans; The NPF emphasises the importance of the language planning process, prescribed under Acht na Gaeltachta 2012. Kerry County Council acknowledges the importance of the Irish language as the vernacular of the Gaeltacht and for the promotion of the language outside the Gaeltacht. The Council therefore is committed to actively supporting and facilitating the implementation of language plans in Gaeltacht Language Planning Areas, and Bailte Seirbhísi Gaeltachta (BSG). There are three Bailte Seirbhísi Gaeltachta (BSG) designated in the County- Tralee, Dingle and Cahersiveen. It is recognised that these towns which are situated in or adjacent to Gaeltacht Language Planning Areas have a significant role in providing public services, recreational, social, and commercial facilities for Gaeltacht areas. Include a new objective; Facilitate and support Language Plans of the County for Bailte Seirbhíse Gaeltachta - Daingean Uí Chúis, Tralee and Cahersiveen, to achieve their target of increasing the number of daily Irish Speakers. It is acceptable to include this text in section 4.5

These amendments are acceptable

These amendments are acceptable

Chapter 10, 10.3.1: the submission states that given that a significant percentage of the Wild Atlantic Way is located inside the Gaeltacht they recommend that the Council focuses on linguistic tourism as part of developing the WAW, KCDP 10-11 & 10-12.

- The submission recommends that recognition be given in the Development Plan to strategic projects that focus on tourism that increase employment and enterprise in the Gaeltacht regions. It is stated that these projects were referred to in the submission sent to the Council in August 2020.
- The submission states that the following plans should be referred to in the Development Plan

Plean Forbartha Chósta na Sceilge ar Eispéireas Cuairteora (Skellig Coast Visitor Experience Development Plan) & Eispéiris Cuartaíochta Chorca Dhuibhne (Dingle Peninsula Visitor Experience Development Plan).

- That the following ways be included in the C.D.P.
 - Bealach Glas Uíbh Ráthaigh
 - Bealaí Rothaíochta na Dromoda (Údarás na Gaeltachta, 2019)
 - Bealach Gorm Chósta na Sceilge
 - Tionscnamh na Spéire Dorcha in Uíbh Ráthach

The submission sets out a list of development estates and lands owned by the Údarás in Kerry Gaeltacht areas. The submission requests that these lands below be given a zoning to assist the Údarás with the development of these areas. The importance of this is outlined in the submission.

Marketing Brand - The submission requests that the official marketing brand developed to recognise producers and businesses in the Gaeltacht areas be referred to in the Development Plan.

Chapter 10 - The points raised are noted. The Council are fully supported of all sustainable tourism projects, particularly those that will increase employment and enterprise in the peripheral regions, including the Gaeltacht. The Development Plan is a strategic land use document therefore every project, walking, cycling and blue way route and tourism plan cannot therefore be listed; these projects/ways/plans could however be considered for inclusion in the relevant Local Area Plan. (The Skellig Coast Visitor Experience Development Plan & Dingle Peninsula Visitor Experience Development Plan are already listed in the relevant LAP).

Section 10.2.3.2 of the Draft Plan sets out clearly that the Vision for Kerry Tourism is 'to maximise, in a sustainable manner, tourism's contribution to the quality of life, economy, employment and local community development, paying particular attention to nurturing and protecting the natural, built, cultural and linguistic heritage of the county'. In addition, it is specifically stated in the Plan that it is a strategic priority of the Council in its Tourism Strategy to 'Protect and enhance Kerry's natural environment, built, cultural and linguistic heritage'.

It is agreed however in the interests of clarity that a specific objective relating to the sustainable development of linguistic tourism should be included in the Development Plan.

The zoning of lands will take place under the Local Area Plan process. A number of the estates identified in the submission have already been zoned for development in the Castleisland/Corca Dhuibhne EA LAP 2020-2026.

Amendments in relation to the marketing brand are set out in the recommendations below.

Recommendations

Insert new text and objective; section 4.5 or **6.4 Language Plans;**

The NPF emphasises the importance of the language planning process, prescribed under Acht na Gaeltachta 2012. Kerry County Council acknowledges the importance of the Irish language as the vernacular of the Gaeltacht and for the promotion of the language outside the Gaeltacht. The Council therefore is committed to actively supporting and facilitating the implementation of language plans in Gaeltacht Language Planning Areas, and Bailte Seirbhísí Gaeltachta (BSG). There are three Bailte Seirbhísí Gaeltachta (BSG) designated in the County- Tralee, Dingle and Cahersiveen. It is recognised that these towns which are situated in or adjacent to Gaeltacht Language Planning Areas have a significant role in providing public services, recreational, social, and commercial facilities for Gaeltacht areas. Include a new objective; Facilitate and support Language Plans of the County for Bailte Seirbhíse Gaeltachta - Daingean Uí Chúis, Tralee and Cahersiveen, to achieve their target of increasing the number of daily Irish Speakers .

Chapter 8:

8.1.1: include a reference to 'Straitéis 20 Bliain don Ghaeilge 2010-2030' in the Draft Plan.

Map 8.1 amend map to show BSG Dhaingean Uí Chúis and Baile Seirbhíse Gaeltachta instead of the English version.

8.1.1.1 Use correct acronyms LPT and BSG instead of LPT and GST in the Irish version of the Development Plan. Amend relevant maps. See also response to Submission no. 1-393.

8.1.1.2: paragraph 2, correct the following spellings: Uíbh and Daingean Uí Chúis.

8.1.2 make the following amendments to the table Corca Dhuibhne, Uíbh Ráthach and the English version Ciarraí Thiar- West Kerry, Ciarraí Theas- South Kerry.

8.1.3: Insert the following new text after the first sentence. **The main factors that needand infrastructure.** It is critically important that people have opportunities available to them to use Irish daily in the community outside of the education system.

Under section 8.1.3 inset the following text: 'It is the policy of Kerry County Council to support and promote the Tobar Dhuibhne 2017 (Language Plan for West Kerry), the Plean Teanga Dhaingean Uí Chúis and the Brí Uíbh Ráthaigh –Plean Teanga Chiarraí Theas 2019-2026, (Language Plan for South Kerry).'

Amend Objective KCDP 8-6: Facilitate and support the following language plans: **Tobar Dhuibhne (2017), Plean Teanga Dhaingean Uí Chúis and Brí Uíbh Ráthaigh –Plean Teanga Chiarraí Theas 2019-2026.**

8.1.3.1: amend under heading Facilities (Áiseanna) - A range of facilities which would provide adequate opportunity **for the use of Irish as well as the** teaching of Irish to a range of age groups and people of different backgrounds. Facilities that would provide for the needs of the community to work, learn, and socialise in a linguistic/cultural appropriate environment.

8.1.3.2: Raise the standard of Irish referred to from B2 to B1.

Amend objective KCDP 8-7: Ensure that developments of multiple residential units **(2 or more)** in An Ghaeltacht settlements shall be subject to linguistic and occupancy requirements in order to protect **and sustain** the linguistic and cultural heritage of the An Ghaeltacht **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.**

Paragraph 5, amend Gaeltachtaí to Gaeltacht areas

Amend s8.1.4 and KCDP 8-13 & KCDP 8-14: use the correct title and spelling of Údarás na Gaeltachta.

Chapter 10: Insert new objective: **Support and facilitate the sustainable development of linguistic and cultural tourism in Kerry.**

Marketing - It is agreed that the official marketing brand which has been developed to recognise producers and businesses in the Gaeltacht areas be referred to under section 8.1.4 of the Draft Plan.

KE-C1-323 Iarnród Éireann / Irish Rail

Summary	Response
<p>The submission makes various the following comments and observations;</p> <p>Need for Investment in Rail-It is recognized that interventions in the transport sector must be based on a long-term strategic vision for the sustainable mobility of people and goods. The Development Plan presents an opportunity to develop the foundation, and begin the implementation, of a sustainable integrated transport system.</p> <p>Intercity and Regional Enhancement Ambitions - The submission notes throughout the importance of the Dublin-Mallow-Tralee to Kerry and sustainable transport.</p> <p>Benefits of investment in the Railway-The submission notes that Investment in Railway can bring the many benefits to Kerry, including the recovery of economic and population growth</p> <p>Local Transport Plans- Iarnród Éireann would appreciate being consulted by the Council in the preparation of the proposed Local Transport Plans for key towns and settlements that are served by the railway (Objective KCDP 14-22). Iarnród Éireann would be happy to discuss this further with the Council and particularly the potential for enhanced integration of bus, bicycle, car and pedestrians with the railway.</p> <p>Kerry Airport- The submission notes Objective KCDP 14-50 to facilitate and support the development of an integrated multi-modal transport system to and from Kerry International Airport (KIA). The railway could support an enhanced multi-modal interchange with the potential for future provision of shuttle bus services to the airport for the 'last mile' connecting trip.</p>	<p>The plan recognises that an essential pillar of any modern country is a sustainable public transport network, and the draft Development Plan provides a solid foundation to support an increase rail capacity on an incremental basis, facilitating commuter and Intercity rail passenger growth to support the county growth ambitions. The plan emphasises that priority should be given to Public Transport and Active Travel schemes, with a particular focus on high-capacity modes, such as rail, which are carbon efficient. The plan recognises the importance of a movement to freight transport which is more carbon neutral.</p> <p>The Council will liaise with all stakeholders in the preparation of local transport plans.</p> <p>The Council would welcome future provision of shuttle bus services to the airport for the 'last mile' connecting trip.</p>

Recommendations

The Council considers it appropriate to include reference to the implementation of the Sustainable Interchange Programme/Accessibility programme/Park & Ride

14.5.1.1 Sustainable Interchange Programme; Iarnród Éireann is developing a number of programmes such as Sustainable Interchange, Accessibility, Park & Ride Programme which will enable more sustainable end-to-end journeys to be made by rail. The Sustainable Interchange Programme will include the provision of facilities within Iarnród Éireann's stations and local environs to provide for ease of interchange between rail and all other modes, prioritising those that are sustainable –cycling, electric charging, wayfinding,and shared mobility.

KE-C1-324 Department of Agriculture, Food & the Marine

Summary

Commercial Sea Fisheries

The submission notes and supports the Plan's recognition of sustainable commercial sea-fisheries as an important industry and states that the evaluation of potential impacts on any commercial sea fishing activities needs to be given consideration as part of any planning/proposal process and during the development process itself.

The submission suggests removing or amending the text "while in recent years there has been a decline in the marine fishing industry due in part to the EU quota restrictions. Section 9.7.6.2.4 [Vol.1] & Section 5.8.8 [SEA]

Section 5.8.8 [SEA]; The submission states that it is unclear in the text which Ministers have remit for fisheries and the marine environment and that Fisheries fall under the remit of the Minister of Agriculture, Food and the Marine.

Development Management Standards & Natura Impact Report: The submission recommends that the Department of Agriculture, Food and the Marine are included as a consultee for the marine environment. In the event that offshore renewable energy installations, such as offshore windfarms, tidal or wave generators and other areas potentially affecting offshore commercial fisheries are being considered, the evaluation and consideration of potential impacts on any commercial sea fishing activities needs to be given consideration as it is essential that any negative impacts on fisheries are avoided.

Response

Comments in relation to the commercial sea-fisheries is noted and the issues outlined are satisfactorily reflected in the plan. Any proposed amendments are set out in the recommendations below.

Recommendations

Comments on Section 9.7.6.2.4 noted, text will be amended as detailed below.

Comments on the Development Management Standards are noted, text will be amended as detailed below.

See SEA ER and NIR responses below re-suggestions for same.

Amend Section 9.7.6.2.4 as follows: "While in recent years there has been a decline in the marine fishing industry due in part to the EU quota restrictions. **The Common Fisheries Policy provides the National framework for the long-term conservation and sustainability of fish stocks.** In Kerry there has been an expansion in the aquaculture and secondary sectors of the industry as a whole and overall fishing remains an important and vital sector in the economy of the County".

Amend in Volume 6, Appendix 1, Section 1.15, fourth paragraph, 2nd bullet point:

After "such as...add **Department of Agriculture, Food and Marine**to the list of consultees

KE-C1-328 The Arts Council / An Chomhairle Ealaíon

Summary	Response
<p>The submission makes the several comments and recommendations.</p> <p>The submission references the many benefits that arts and culture as well as referencing the recognition in many national and regional documents and guidance documents as to the importance of art and culture in our communities. The submission also makes reference to the obligations under the planning and development act specifically the provisions of section 10(2) which sets the basis for the provision of arts by making specific requirements for objectives to be included in the development plan.</p> <p>The Arts Council would welcome a Development Plan which includes objectives which seek to support the provision of ‘arts and culture’ as increasingly important community infrastructure, in addition to supporting the development of the “culture and creative sector”.</p> <p>The submission outlines the Arts Council’s current investment into Creative Places Uíbh Ráthaigh (2021- 2022) and the support of the wider concept of ‘cultural’ development’ in everyday development which is more reflective of current and emerging spatial trends and investment programmes, it requests the following amendment; “to support initiatives to strengthen and improve the physical environment, AND THE SOCIAL, CULTURAL AND ECONOMIC DEVELOPMENT’ of towns and villages and encourage positive place-making”.</p> <p>The Arts Council welcomes the specific policy provisions detailed under section 8.2.1 which seek to support the development of arts and cultural infrastructure in the County, it requests clarification regarding where and what level of infrastructure is required and who controls it.</p> <p>The Arts Council would welcome the inclusion of clear, implementable objectives to provide greater clarity on how it intends that arts and culture infrastructure will be supported and delivered under the provisions of the County Development Plan and the policies enclosed.</p> <p>The submission requests the provision of artist workshops and exhibition spaces as these would enable artists to live and work in Kerry.</p> <p>The Council should be mindful that in preparing its Kerry Arts Strategy 2016-2021, research including consultation meetings with arts professionals and a questionnaire were undertaken. This research highlighted that there is a need for spaces that artists can use to create and display their work in the county. As a new initiative, the Arts Strategy seeks to develop “space to create and showcase work for artists”.</p>	<p>It is considered that the Draft Plan identifies the importance of arts and culture, under Chapter 6 Sustainable Community, Chapter 8 Gaeltacht Areas/Culture & Chapter 10 Tourism. It is considered that the Draft Plan goes as far as it can within its remit as a land-use framework, to support the arts. The ‘plan’ for the development of the arts in Kerry is County Arts’ Strategy 2016-21 (as amended), not the CDP; the locational or spatial extent of arts and cultural projects would be matter for the County Arts’ Strategy.</p> <p>It is considered acceptable to refer to Life Worth Living (<i>The Report of the Arts and Culture Recovery Taskforce</i>) November 2020 which sets out how best the Arts and Culture sector could adapt and recover from Covid-19 pandemic, and the importance of outdoor public spaces to access arts and cultural events in the aftermath of the pandemic. It is considered prudent to acknowledge the inclusion of the wider concept of ‘culture’ which is more reflective of current and emerging spatial trends and investment programmes.</p> <p>The Local Authority are fully supportive of the provision of artist workshops and exhibition spaces.</p>

<p>The Arts Council supports the Draft Plan objectives related to protecting quality in architecture in the designed environment, especially as set out in Chapter 18 (Gaeltacht Areas, Culture and Heritage) and Volume 6 (Development Standards).</p> <p>The Arts Council would welcome the Development Plan to include provisions that promote high-quality contemporary architecture which is designed and built to last, which; is designed for climate resilience and sustainability and that public spaces are of sufficient quality, and designed for public benefit, use and functionality.</p> <p>The Arts Council would suggest that an arts and culture infrastructure audit be undertaken to inform the evidence based approach for the provision of cultural facilities, in order to assist this approach, a county register of arts and cultural assets could be established.</p>	<p>The Council are fully support of high quality contemporary architecture in the right context and are avail to meet to discuss any prospective developments through the preplanning process.</p>
<p>Recommendations</p> <p>Refer to Life Worth Living(<i>The Report of the Arts and Culture Recovery Taskforce</i>) November 2020 within the Chapter 8 section 8.2.1</p>	

<p>KE-C1-329 Land Development Agency</p>	
<p>Summary</p> <p>The submission makes reference to the Role of the LDA as well as the services that they may provide for local authorities</p> <p>They welcome the reference in the plan to the LDA. They note that while there are no public lands identified for transfer to the LDA within the Kerry County Council area, the LDA welcomes the intention of the Council to work together with them to facilitate the assembly/ acquisition, financing, and appropriate redevelopment of suitable, publicly owned, sites in the future.</p> <p>It is suggested that a reference to the LDA could be inserted into this objective as follows;</p> <p>KCDP 4-1 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 AND TO ENGAGE WITH THE LAND DEVELOPMENT AGENCY (LDA), WHERE APPROPRIATE, IN THE IDENTIFICATION, PLANNING AND CO-ORDINATION OF STRATEGIC, PUBLICLY OWNED LAND BANKS TO ACHIEVE COMPACT GROWTH, SUSTAINABLE DEVELOPMENT, AND URBAN REGENERATION.</p>	<p>Response</p> <p>Given the role of the Land Development Agency regarding publicly owned land and the provision and delivery of quality affordable and sustainable housing it is considered acceptable to amend objective KCDP 4-1 to include reference to the LDA, as set out in the recommendations below.</p> <p>Suggested wording amendments have been incorporated as set out in the recommendations below.</p>

Recommendations

Amend objective KCDP 4-1 to state:

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 *and to engage with the Land Development Agency (LDA), where appropriate, in the identification, planning and co-ordination of strategic, publicly owned land banks to achieve compact growth, sustainable development, and urban regeneration.*

KE-C1-330 Electricity Supply Board

Summary

The submission sets out that ESB is committed to doing its part in supporting and delivering on Government’s energy policy. The submission states that mirroring Government objectives, by 2030 ESB will develop an additional 4 GW of new onshore and offshore wind and solar PV renewable assets to add to their 1 GW of renewables operating today. It is stated that by 2030, 63% of ESB’s electricity will come from renewable sources and that they will be a net zero producer of electricity by 2040.

The submission outlines that KCDP 2-2 should be amended to reflect the most recent version of the Climate Action Plan 2021 and amend Section 12.5.1 as currently the targets outlined in this section are from the Climate Action Plan 2019 and could be updated to reflect the new targets from the Climate Action Plan 2021.

The submission states its support for Chapter 12 and particularly Section 12.1 where it states, “support the safeguarding of strategic energy corridors from encroachment by other developments that could compromise the delivery of energy network” and Objectives KCDP 12-6, KCDP 12-7 as well as Objective KCDP 2-12.

The submission acknowledges that over 35% of the county is designated under the Natura 2000 network and that the Council shall work in partnership with existing service providers to facilitate required enhancement and upgrading of existing infrastructure and networks (subject to appropriate environmental assessment and the planning process) and the submission welcomes the update to Objective KCDP 12-8 in the Plan - highlights that concerns about visual, amenity, health and safety need to be mitigated through the consultation process.

Response

The Draft Plan contains the planning policies as set out in Chapter 12 which protects the County’s future capacity for the development of energy generating, processing and transmission infrastructure whilst encouraging the sustainable development of the County’s renewable energy resources.

Noted that the most recent version of the Climate Action Plan should be referenced in the Plan – see recommendations set out below.

Support for Section 12.1 is noted and welcomed.

<p>The submission welcomes the ambition of Kerry County Council to work with Dingle Creativity and Innovation Hub to pilot Dingle as decarbonising zone for the county as underpinned by Objective KCDP 2-3.</p> <p>Wind Energy; The submission welcomes the inclusion of Objective KCDP 12-13, KCDP 12-16 and KCDP 12-18 but states that initial analysis of the areas identified as ‘Open for Consideration’ highlights that it may not be possible to secure planning permission for viable windfarms at these locations due to the turbine heights required coupled with the proximity of residential property. ESB welcome the provision of supporting objectives for repowering of existing wind farms.</p> <p>It states that while the Draft Plan contains comprehensive development guidance for windfarms, it is suggested that the County Development Plans and Wind Energy Strategies of adjoining counties should be taken into consideration.</p> <p>Marine & Offshore Wind; The submission states that ESB’s Brighter Future Strategy sets out a major aspiration to develop in excess of 2GW of offshore wind in Ireland and the UK by 2030. The submission welcomes the inclusion of Objective KCDP 9-83, KCDP 9-84 and KCDP 12-29.</p> <p>Solar; ESB welcome the support for the development of solar energy in the County as set out in the Draft Plan under Objectives KCDP 12-21 and 12-22 as parts of North Kerry rank highly in terms of solar resource in Ireland. In this regard it is suggested that the overall guidance on solar developments could be strengthened with the provision for extension of duration of permission, it may be more appropriate for the Planning Authority to retain the option to grant permission for a longer period if requested by the developer in appropriate circumstances. In this regard, ESB request that permissions are granted with a lifetime up to a maximum of 40 years.</p> <p>Energy Storage: The submission welcomes the inclusion of Objective KCDP 12-30. ESB is already installing Battery Energy Storage Systems (BESS) at existing facilities and these batteries can stabilise the frequency of the electricity network further enabling the operation and stability of a highly renewable system. ESB is engaged in the assessment and development of Irish offshore green hydrogen subsurface storage. Green Hydrogen, which is produced from renewable energy sources, offers potential for large scale seasonal storage of variable renewable energy. This enables zero carbon backup to the power system when intermittent renewables such as wind and solar are not available. Large scale Green Hydrogen production and storage could leverage the continental scale of Ireland’s renewable energy potential to enhance Ireland’s energy security and to make Ireland a net exporter of energy.</p>	<p>In relation to wind and renewable energy refer to response to Submission KE-C1-365 [OPR].</p> <p>In the absence of national Guidelines for Solar Energy farms it is not consider appropriate to either stipulate or limit the duration of permission.</p> <p>The draft plan contains an Objective [KCDP 12-30] in relation to battery storage.</p> <p>The transition to a low carbon energy future will require a wide range of responses across the public and private sectors including sustainable transport. This plan aims to support the increased use of sustainable modes of transport; 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.</p>
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<p>Hybrid Renewables; By developing hybrid renewables plant consisting of wind, solar and battery exporting from common point of connection, but at different times, the need for transmission infrastructure associated with new generation is minimised and grid stability can be improved on. It requests an additional Objective, regarding proposals for hybrid energy systems and/or co-location of renewable energy.</p> <p>Renewables-Enabling Plant; The submission notes that the requirement for renewables-enabling Plant is not acknowledged in the Draft Plan. Given that North Kerry has access to Gas Network, the inclusion of the text below as a promotional Objective for the development of Renewable Enabling Plant will further assist in the transition to a low carbon economy. “It must also be recognised that natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.”</p> <p>Telecommunications; ESB supports the approach and the view of Kerry County Council that to facilitate the provision of telecommunications services at appropriate locations within the County, the applicant must demonstrate compliance with national guidance.</p> <p>Sustainable Transport & Electric Vehicles; The overall support for Electric Vehicles throughout the Plan is acknowledged. Objectives KCDP 2-12, KCDP 14-36, KCDP 14-37 all seek to support the expansion of the EV charging network by increasing the provision of designated charging facilities. These promoting objectives are under pinned by the parking standards set in section 1.20.2 of the Development Management Standards. ESB welcome the above initiatives, however, it is very important to note that the EU Energy Performance of Buildings Directive calls for an increase to 20% for the number of parking spaces which should have provision for electric vehicle charging infrastructure.</p>	<p>The Council recognises that Kerry’s coastal location coupled with a good solar irradiation and significant grid network present opportunities to maximise energy generation by solar means. The Council supports hybrid connections (co-location of two or more renewable energy sources)</p> <p>The Draft Plan aims to facilitate the sustainable provision of charging infrastructure for electric vehicles at appropriate locations. However, it is considered prudent to add specific guidance in relation to the provision of EV charge points at commercial and ‘on-street’ locations to ensure the proposed levels of parking provision for EV’s are achieved. It is considered appropriate to include additional standards for the provision of EV infrastructure.</p>
<p>Recommendations</p> <p>The plan will be updated to refer to the Climate Action Plan 2021 [KCDP 2-2 and Section 12.5.1]</p> <p>It is considered acceptable to include an additional Objective, regarding proposals for hybrid energy systems and/or co-location of renewable energy</p> <p>Support and facilitate proposals for hybrid energy systems and/or co-location of renewable energy where applicable where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment.</p> <p>The council seeks to promote, encourage and facilitate the use of sustainable modes and patterns of transport, including electric vehicles, to ensure the implementation of the latest standards consistent with S.I. No. 393/2021. This will support the extension of charge point infrastructure to ensure it becomes a comprehensive network of public and domestic charge points with open systems and platforms accessible to all supply companies and all types of electric cars.</p>	

Add specific guidance in relation to the provision of EV charge points in Section 1.20 of the Development Management Standards Vol.6.

Development Category	EV Charging Point
Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces).	A minimum of 1 EV charge point space per five car parking spaces (ducting for every parking space shall also be provided)
New dwellings with in-curtilage car parking.	installation of appropriate infrastructure to enable installation of recharging point for EV's
Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g.,office developments	provide at least 1 recharging point, and a minimum of 1 space per five car parking spaces should be equipped with one fully functional EV Charging Point
Developments with publicly accessible spaces (e.g.,supermarket car park, cinema etc.)	Provide at least 1 recharging point, and a minimum of 1 space per five car parking spaces should be equipped with one fully functional EV Charging Point

KE-C1-350 EirGrid Group PLC.

Summary	Response
<p>EirGrid notes and welcomes reference and emphasis placed on electricity transmission in the Draft Development Plan, particularly Chapter 2 Climate Change & Achieving a Sustainable Future and Chapter 12 which details Energy. These provisions will support key infrastructure providers, such as EirGrid and the Electricity Supply Board (ESB), in efforts to reinforce and strengthen existing utility infrastructure and transmission networks. The reinforcement of this infrastructure is critical to meeting climate change targets.</p> <p>EirGrid considers that the plan needs to support a safe, secure and reliable supply of electricity, and this needs to be explicit in subsequent iterations of the development plan; by so doing, this will assist EirGrid in the successfully implementation of its Grid Development Strategy - Your Grid, Your Tomorrow (2017), Shaping our Electricity Future - A Roadmap to achieve our Renewable Ambition (2021) and future grid development plans. This is</p>	<p>It is considered acceptable to update the relevant documents, amend KCDP 12-9 Support the sustainable implementation of EirGrid's Grid 25 Investment Programme <i>Shaping Our Electricity Future roadmap</i> (and successor programmes), subject to landscape, residential, amenity and environmental considerations.</p> <p>The Council recognise that a flexible approach in developing essential transmission grid infrastructure is required to support wider environmental, social and economic development throughout the county. Regarding route selection, objective 12-8 states that consideration will be given to undergrounding or the selection of alternative routes, the council will continue to work with Eirgrid to facilitate the sustainable provision of infrastructure.</p>

<p>imperative to meeting national targets for electricity generation, climate change targets, and security of energy supplies.</p> <p>Addition text, policy support and specific reference to the execution of Shaping our Electricity Future - A Roadmap to achieve our Renewable Ambition (2021) and the development of a safe, secure and reliable supply of electricity and the development of enhanced electricity networks, would be welcomed in the plan.</p> <p>Regarding Objective KCDP-12-8; EirGrid understands the principle underlying it and will always examine the feasibility for undergrounding. However, it is not always possible for high voltage transmission infrastructure to be located underground, even in urban areas, for a variety of reasons. A flexible approach in developing essential transmission grid infrastructure is required to support wider environmental, social and economic development.</p> <p>EirGrid carefully plans its routes and sites for new transmission grid infrastructure. The final route for any line is a carefully considered balance of technical, economic, planning, environmental considerations. Where it is not possible to use underground technology or avoid natural features of the environment and areas of significant population EirGrid will always explain this as part of its substantive reasons for the route design.</p> <p>Regarding Objective KCDP 12-9; it is noted that EirGrid’s Grid 25 Investment Programme has been superseded by EirGrid (2021) Shaping Our Electricity Future - A roadmap to achieve our renewable ambition [available online]. It is recommended the objective is amended to reflect the most recent document.</p> <p>EirGrid welcomes objective KCDP 12-29 and a strategic focus on ocean energy, as it will facilitate the generation of electricity from offshore technology and Kerry has considerable capacity available for new generation in future. This policy will assist in ensuring Ireland can tackle the cause and adapt to the effects of climate change in an immediate manner, when required.</p>	<p>The relation to renewable energy see response to Submission KE-C1-365 [OPR].</p>
<p>Recommendations</p> <p>Amend KCDP 12-9 Support the sustainable implementation of EirGrid’s Grid 25 Investment Programme Shaping Our Electricity Future roadmap (and successor programmes), subject to landscape, residential, amenity and environmental considerations.</p> <p>New Objective - When considering the siting of powerlines all technological options including undergrounding shall be considered and it will be a priority to seek to avoid significant adverse effects on the environment including sensitive landscape areas and the ecological integrity of Natura 2000 sites</p>	

KE-C1-353 Department of Environment, Climate and Communications

Summary	Response
<p>This submission is primarily from Geological Survey of Ireland. The submission states that the Plan should reference the updated The Climate Action Plan 2021. The submission welcomes the statement in the Draft Plan that the County has significant renewable electricity potential, with “huge potential for the development of wind, solar, biomass, geothermal, hydro and wave energy”, and with “wave and wind resources are among the richest in Europe”. In particular, Policy KCDP 12-12, to “Maximise the development of all renewable energies at appropriate locations in a manner consistent with the proper planning and sustainable development of the County,” is supported.</p> <p>The Department also notes, however, that the effect of the methodology employed in Appendix 6 of the Draft Plan may be to significantly reduce the available land for onshore wind energy. The submission seeks clarification as to the rationale for this methodology, its effects on delivery and, in particular, how the wind energy strategy presented in the Draft Plan complies with national policy and targets.</p> <p>Geoheritage - Welcomes the inclusion of policy objectives KCDP 11-3, KCDP 11-75 and KCDP 11-76, it states that an audit of the County Geological Sites (CGSs) for Kerry County was due to commence during 2020 but was delayed due to the Covid-19 Pandemic and as such the CGS for Kerry remain unaudited. As such there is limited detailed information on each site available.</p> <p>Culture and Tourism; The submission would welcome the amendment of KCDP 10-3 and KCDP 10-5 to include Geological Survey Ireland as a strategic partner to develop the tourism sector and identify land use strategies in Co Kerry.</p> <p>It states that as well as being an UNESCO World Heritage Site, Scelig Mhichil is an important county geological site. The Kerry County Council is encouraged to use geological information to be a significant part of any tourism initiative (such as Draft Killarney Destination Experience Development Plan) that may be introduced.</p> <p>Groundwater - The submission welcomes the inclusion of Objectives KCDP 13-5, KCDP 13-6 and KCDP 13-11. It is recommended the ongoing use of Geological Survey Ireland’s Groundwater maps and datasets within the Development Plan.</p> <p>Geothermal Energy - Attention is drawn to two new Geothermal publications. <i>The Roadmap for a Policy and Regulatory Framework for Geothermal Energy</i> was launched at the</p>	<p>The submission is noted and support is welcomed, the majority of amendments are considered appropriate and are set out in the recommendations section below.</p> <p>The Climate Action Plan 2021 was published on the 4th of November 2021, when the drafting of the County Plan had been completed. Therefore, the draft CDP will now be updated to take into account the recently published Climate Action Plan 2021. All reference to the NCAP 2019 in the plan will be amended to 2021.</p> <p>For responses in relation to the Chapter 12 Energy (including wind) Appendix 6 and revisions made to policy and objectives resulting from the public consultation of the CDP see Response KE-C1-365 [OPR]. Further to same, the Local Authority is satisfied that the CDP meets and is consistent with the ambitions for renewable energy production as expressed in the CAP 2021 and meets the requirements of the National and Regional renewable energy objectives.</p> <p>In relation to comments on Geoheritage, acknowledgement and support for Geoheritage objectives included in the plan is noted from the submission. As requested, the LA has included County Geological Sites (CGS) in the CDP and continues to support auditing of same.</p> <p>Comments on KCDP 10-3 and 10-5 and the potential for geo-tourism are noted. Although the objectives are already qualified by “other relevant bodies”, it is acknowledged that geological heritage and GSI may not be an obvious consultee, therefore see amended text outlined below.</p> <p>Comments in relation to groundwater and use of appropriate mapping are noted. Section 13.2.1.4 outlines policy in relation to ground water protection. Groundwater mapping is reviewed, and updated maps are used accordingly in the functioning of the LA in groundwater protection.</p>

<p>Geoscience 2020 Conference in November 2020. <i>The Assessment of Geothermal Resources for District heating in Ireland</i> and the <i>Roadmap for a Policy and Regulatory framework for Geothermal Energy in Ireland</i> documents have been developed to support the Government's commitments under the Climate Action Plan 2019 and the Programme for Government.</p> <p>Natural Resources (Minerals/Aggregates) - The inclusion of geological heritage and/or "sites of geological importance" within Objective KCDP 9-66 is welcomed. It requests the inclusion of the '<i>Geological Heritage Guidelines for the Extractive Industry</i>' within this statement. The Geoheritage Programme tries to promote a partnership between geological heritage and active quarrying, with such measures as those outlined in the '<i>Geological Heritage Guidelines for the Extractive Industry</i>', which can be downloaded here. This document, written in association with Irish Concrete Federation, acts as a comprehensive guide in the sustainable extraction of natural resources while preserving the geological heritage of Ireland.</p> <p>Physiographic Units - these are cartographic representations of the broad-scale physical landscape of a region. They delineate physical regions showing internal uniformity with respect to one or more environmental attributes that can be clearly differentiated from neighbouring regions. They are valuable for regional land-use planning, and in studies of the influence of physical landscape on the ecological environment. This map is produced in support of the actions to be implemented in National Landscape Strategy for Ireland 2015 – 2025. Physiographic Units map data can be viewed online under the Physiographic Units tab on the online Map Viewer. This map would be of benefit to objective KCDP10-3 in Chapter 10 'Tourism & Outdoor Recreation'.</p>	<p>The two new Geothermal publications are noted.</p> <p>The proposed inclusion of reference to the 'Geological Heritage Guidelines for the Extractive Industry' is welcomed – see amendments as set out in the recommendations below.</p> <p>Comments in relation Physiographic Units and associated mapping are noted. The CDP recognises a wide variety of plans, maps and reports and while it is not possible to provide an exhaustive list, consideration of physiographic unit mapping in the context of Chapter 10 is noted.</p>
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Recommendations

- Amend KCDP 10-3 Liaise with strategic partners such as Fáilte Ireland (South-West Region), the National Parks and Wildlife Services, Inland Fisheries Ireland, Waterways Ireland, Coillte, GSI and other relevant national bodies and the local tourism sector on the identification of land use strategies for areas, focusing on their tourism, environmental and heritage value.
- Amend KCDP 10-5 Engage and collaborate with strategic partners such as Fáilte Ireland, the National Parks and Wildlife Services, OPW, Inland Fisheries Ireland, Waterways Ireland, Údarás na Gaeltachta, Coillte, GSI and other relevant bodies and local communities to develop the tourism sector in Kerry and to ensure that the economic potential of the tourism sector is secured for the benefit of the local economy.
- Amend KCDP 9-66 Ensure all extractive development proposals comply with the objectives of this plan including development management standards, flood risk management requirements and the protection of landscape, biodiversity, infrastructure, water and air quality, built, and cultural and geological heritage [*Geological Heritage Guidelines for the Extractive Industry*]
- Amend Chapter 9, Section 9.7.6.2.1, last paragraph, last line: The council will look favourably on the siting and design of these facilities within existing quarry sites subject to detailed environmental assessment. The council will have regard to the Quarries and Ancillary Activities-Guidelines for Planning Authorities (2004) and the '*Geological Heritage Guidelines for the Extractive Industry*'.

Amend Volume 6, Appendix 1 Development Management Standards and Guidelines, Section 1.16 (l) as follows:

l) The Council will require an Ecological Impact Assessment or Natura Impact Statement for all proposals within or in the vicinity of an SPA, SAC or NHA. Where a quarry development falls within a conservation designation, the developer is advised to consult with the National Parks and Wildlife Service prior to making an application. **As regards the protection of the county's geoheritage, the developer is also advised to consult with Geological Survey Ireland (GSI).** Evidence of such consultation should be submitted to the Planning Authority at application stage. The Council will require that the operator of the quarry shall put in place an Environmental Monitoring System, to monitor all environmental standards (noise, dust, blasting etc.) on an on-going basis. It is recognised that quarries offer opportunities for heritage and biodiversity, particularly in less intensively used areas of quarries and as part of site restoration. Heritage and biodiversity enhancement measures, to include consideration of geological heritage, is required to be taken into consideration as part of required site restoration proposals. **Such plans will need to consider the following geoheritage mitigation, in consultation with GSI, as appropriate:**

1. The facilitation, where feasible, of access to quarry faces by appropriate geo-scientists during quarrying to assess any geologically interesting new stratigraphies / relationships as they might become exposed and to establish if the quarry site is worthy of recognition post extraction and through aftercare/restoration planning, and

2. If deemed appropriate, exploring opportunities for a representative section of the quarry face at the end of the quarry life or inclusion of information panels to promote the geology to the public or develop tourism or educational resources if appropriate depending on the future use of the site, in consultation within the Geoheritage Programme of GSI.

KE-C1-365 Office of the Planning Regulator (OPR)

<p>Summary Settlement Hierarchy & Distribution of Growth The submission states the following as a recommendation: Having regard to RPO 3, NPO 9 and RPO 11, and NPO 33 the planning authority is required to revisit, in an evidence based approach, the settlement hierarchy and distribution of future population growth and housing targets to achieve a more sustainable level of growth as follows: (i) reposition Milltown within the settlement hierarchy as a District Town, and significantly reduce its housing supply target in line with its revised position; (ii) reduce the population/ housing allocation to Barraduff commensurate with its settlement function and position in the settlement hierarchy; (iii) reduce the population/ housing allocation to the settlements of Farranfore and Fenit commensurate with settlement function and position in the settlement hierarchy and with regard to the current deficiency in wastewater infrastructure in Fenit; and (iv) ensure that any reallocated growth is transferred to the Key Towns of Tralee and Killarney.</p>	<p>Response Recommendation 1 – Settlement Hierarchy & Distribution of Growth Response: <u>Population Distribution</u> The population growth allocation and distribution for Tralee and Killarney will ensure that these Key Towns will grow by over 30% by 2040 (in accordance with the RSES), positioning these settlements as sufficiently sized urban zones to attract additional employment and population, which will increase their competitiveness and attractiveness as national and regional investment locations. 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. • 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.
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- The appropriate density and scale of development relative to the settlement and location, incl. differing rates and nature of development experienced.

In addition to the above the population growth figures were adjusted to cater for the demand as outlined in the Housing Strategy / HDNA in volume 6 and Kerry County Councils Housing Plan.

Milltown.

The plan recognises that Milltown is a rapidly changing and evolving town. Milltown is a growing town, with a vibrant population profile, that serves as a commuter base. The town has seen a rapid expansion in housing numbers which has resulted in the provision of further educational and community infrastructure and services. Over the coming years, the development of a more sustainable community will necessitate further investment in transport, local infrastructure and amenities and economic development – so that the town becomes more than a dormitory town, in which residents have an improved quality of life and better environment.

Milltown has expanded due to its central geographical location in proximity to Tralee, Killarney and Killorglin. This expansion is partially due to the price of property in Tralee and especially Killarney, and to the availability of serviced land. However, having regard to the OPR’s submission and Milltown’s juxtaposition in close proximity to the two Key Towns 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.

Barraduff.

Barraduff has a modern sewerage network and treatment plant designed to accommodate a population equivalent of 1,316. The P.E. far exceeds the existing loading of 600 indicating a large spare capacity. It is preferable that adequate suitably located lands are zoned in the interests of proper planning and longer-term sustainable development of the settlement. A strategic land reserve (R4) has been provided (in the LAP) to cater for the long-term development of the village.

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.

Farranfore.

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.

Fenit

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.

Significant public investment is underway or imminent for Fenit village including;

- Tralee - Fenit greenway.
- Beach facilities. (Fáilte Ireland)
- New wastewater treatment plant
- Realignment of the access road through the village to the harbour area.

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.

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:

- 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 multi-unit developments,

It is essential that a reasonable population target be allocated to Fenit.

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.

Core Strategy Table & Map

The submission states the following as a recommendation:
In accordance with Sections 10(2A) and 10(2B) of the Planning and Development Act 2000, as amended, and having regard to the Development Plans, Guidelines for Planning Authorities - Draft for Consultation (August 2021) and the Guidance Note on Core Strategies (2010), the planning authority is required to clarify Table 3.7 as the 'Core Strategy table' for the draft Plan, and to: (i) include the existing and proposed area zoned, per settlement, to accommodate residential development in hectares and estimated housing yield for each settlement, including those settlements accommodating zoned land in Local Area Plans (LAPs); (ii) include the residential densities used in the calculation of housing yield for each settlement consistent with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages)(2009); (iii) include columns detailing the area of land in each settlement that will contribute to compact growth including infill and brownfield lands, and the anticipated housing yield from compact growth for each settlement; and (iv) review the Core Strategy Map (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. Note: Appendix A of the Development Plans Guidelines for Planning Authorities – Draft for Consultation (August 2021) provides a useful reference and illustrative example of a core strategy table.

Recommendation 2 – Core Strategy Table & Map**Response:**Core strategy table

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.

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.

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.

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 LAPs therefore continues to remain consistent with this updated Core Strategy. (See section 3.13 of the draft plan.)

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 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>Development Approach and Local Area Plans</p> <p>The submission states the following as a recommendation: Having regard to the provisions of 18(4)(b) and 19(2B) of the Planning and Development Act 2000, as amended, which require the planning authority to amend, replace or provide local area plans (LAPs) for up to 20 settlements within one year of the making of the development plan, the planning authority is required to clearly set out how the objectives in Section 10(2) of the Planning & Development Act 2000, as amended, are to be achieved in the interim and pending the adoption of LAPs for the following settlements:</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 such as flooding, sustainable mobility objectives, and any further relevant key future priorities; and</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 to provide for flexibility and ensure that rural villages provide attractive, easily developed options for housing in accordance with the population projections and housing supply targets identified in the Core Strategy and RPO27 which seeks to support rural economies and rural communities. The planning authority is required to provide a timescale for the timely review of all</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> <p>Recommendation 3 – Development Approach and Local Area Plans</p> <p>Response:</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.</p> <p>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, 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>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>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>
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LAPs to ensure compliance with the Core Strategy and the Housing Supply Targets in particular and prioritising those towns with the potential for significant development in the short term.

Observation 1 -Compact growth and Regeneration

The submission states as an observation:

Having regard to the national policy objectives for compact growth NPO 3b and NPO 3c and the corresponding regional objectives 34, 35 and 37 supporting regeneration and revitalisation in the RSES, the planning authority is requested to: (i) strengthen and provide clarification on how a number of the objectives detailed in Chapter 4.0 of the draft Plan are to be delivered, including Objectives KCDP 4-6, KCDP 4-8, KCDP 4-10, KCDP 4-13 to KCDP 4-16 and KCDP 4-42, by identifying those settlements where concrete initiatives are proposed and required including streetscape improvements, green infrastructure, Action Plans for Town Centre renewal, the implementation of Village Design Plans and Public Realm Plan, and the delivery of enhanced walking and cycling permeability to deliver sustainable compact settlements with the 10-minute town concept; (ii) provide further clarity on objectives seeking the preparation of Masterplans in the towns of Tralee, Killarney and Listowel; this should include specifying the agent responsible for their preparation; a timeline, where appropriate; and the mechanism to ensure delivery; and (iii) include objectives for monitoring the implementation of compact growth

Observation 1 – Compact growth and Regeneration

Response:

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. The Town Centre First Approach 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, Town Regeneration officer and forthcoming Town Centre First Plans. 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 and presently funded by the URDF and RRDF.

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:

- Island of Geese regeneration area and public realm. (Tralee)
- Phase III Tralee Town Centre Public realm improvement works.
- Áras Padraig 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)
- 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)

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.

Observation 2 – Development Management Standards

The submission states as an observation:

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 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.

Observation 2 – Development Management Standards**Response:**

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 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 observed for new, reciprocal overlooking housing, although this will also be informed by considerations such as typography, design, and housing type and mix, *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.*

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.

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.

Amended Plan Wording:

1.5.4.6 Private Open Space

- 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.*
- 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:

<p>Recommendation 4 – Traveller Accommodation The submission states as a recommendation: Having regard to the requirements of section 10(2)(i) of the Planning and Development Act 2000, as amended, the planning authority is required to identify in the Plan the use of particular areas for traveller accommodation. This will include the identification of specific locations in the land use zoning maps for the county.</p>	<p>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).</p> <p>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:</p> <p>A minimum driveway length of 6 m. should be maintained where appropriate to the site context.</p> <p>Recommendation 4 – Traveller Accommodation Response: 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 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>Recommendations: It is recommended that 'Traveller Accommodation' is included in the Zoning Matrix contained in Volumes 2 and 6 of the Draft Plan.</p>
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Recommendation 5 - Rural Housing Policy

Firstly, the submission generally welcomes the evidence-based approach adopted to identify and rationalise the three Rural Area Types in the County, comprehensively detailed in Volume 1 Appendix 8 of the draft Plan in line with the approach recommended in section 3.2 of the Sustainable Rural Housing Guidelines for Planning Authorities (2005) and with the requirements of the National Policy Objective (NPO) 19 of the NPF.

The submission states as a recommendation:

Having regard to the recommendations of the SEA Environmental Report, and to the NPO19 and RPO27 which require the provision of single housing in the countryside to be based on the core consideration of demonstrable economic or social need, and to the Sustainable Rural Housing Guidelines for Planning Authorities (2005), which provides an evidence-based approach to determining rural area types, the planning authority is required to: (i) 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 and KCDP 5-13 and criteria '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 from rural housing policy Objective KCDP 5-12.

Recommendation 5 – Rural Housing Policy

Response.

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.

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.

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 nature, with the limited multiunit development taking place within settlements consisting largely of social housing.

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 County's smaller settlements, the retention of services and facilities and a reduction in incidences of building vacancy and dereliction.

While map 5.1 contains three distance rural area types, there remains no policy difference *between rural areas under significant urban influence and rural areas under urban influence*. 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) [*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*] be omitted.

The inclusions of Objective 5-12(d) and 5-13(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 / ten years prior to the date of the planning application*] within rural areas under significant urban influence and rural

<p>Cluster Housing</p> <p>The submission states as an observation:</p> <p>The planning authority is requested to review and clarify its policy approach in respect of cluster housing as set out in Objective KCDP 5-9 in order to: (i) ensure that all identified settlements, including those additional settlements not included in the settlement hierarchy and which are subject to Objective 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 to clarify where Objective KCDP 5-9 (cluster housing) applies; (iii) define a settlement boundary to each small village</p>	<p>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 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>Recommendations:</p> <p>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 deleting categories (d) and (e):</p> <p>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.</p> <p>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 deleting category (d):</p> <p>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>Observation 3 – Cluster Housing</p> <p>Response:</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 villages. 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>
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settlement, where not already indicated in an current Local Area Plan; 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.

Employment Zoned Land

The submission states as an observation:

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).

Recommendation 6 - Tarbert Bay pNHA

The submission states as a recommendation:

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.

Recommendations:

It is considered appropriate to omit the settlement of Baile na nGall from Table 5.1.

Observation 4 – Employment Zoned Land

Response:

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.

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 including 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.

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.

Recommendation 6 – Tarbert Bay pNHA

Response:

Proposed landbank zoning extension at Tarbert

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.

Recommendation:

It is recommended that the lands contained within the Tarbert Bay pNHA, identified in red in the following map 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.

<p>Quarries & Minerals The submission states as an observation: Having regard to National Policy Objective 23 and the section 28 Quarries and Ancillary Activities Guidelines for Planning Authorities (2004), the planning authority is requested to include a map to show the location of quarries and minerals across County Kerry.</p> <p>Modal Share & Sustainable Transport The submission states as an observation: In order to ensure the effective planning, implementation and monitoring of the development plan requirements under section 10(2)(n) of the Planning and Development Act 2000, as amended, 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 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.</p> <p>Observation 5 – Quarries & Minerals Response: 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>Recommendations: Include a map highlighting minerals and aggregates across the County.</p> <p>Observation 6 – Modal Share & Sustainable Transport Response: 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 greenways there is a strong emphasis on connectivity, green infrastructure and sustainable transport throughout the plan. 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 in Chapter 9 Economic 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>
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<p>Climate Action</p> <p>The submission states as an observation:</p> <p>Given the importance attributed to climate action by Government, as evidenced by, inter alia, the recent Climate Action and Low Carbon Development (Amendment) Act 2021 and the Climate Action Plan 2021, the planning authority is advised that the draft Plan should also 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) as adopted or any other relevant guidelines. The draft Plan should also seek 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>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 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.</p> <p>Observation 7 – Climate Action</p> <p>Response:</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 that are 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>A number of objectives in the plan support nature-based solutions to climate change challenges and initiatives aimed at increasing soil carbon retention, sequestration, and storage. In particular Objective KCDP 11-22 seeks to support projects such as nature based sustainable urban drainage systems and other actions that seek to enhance urban wildlife. It is considered acceptable, however, to include an additional objective seeking to: <i>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’.</i></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, <i>and to consider a variation of this development plan if necessary to align with the approach recommended in the Ministerial guidelines: Development Plans, Guidelines for Planning Authorities.</i></p>
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Recommendation 7 - Renewable Energy Targets & Wind Energy

Firstly the submission states that the Office recognises the contribution that County Kerry has made under its current plan to the generation of renewable wind energy. The need to decarbonise energy sources continues to be a critical factor in terms of addressing climate change, and indeed will require further wind energy development in appropriate locations if the targets set out in the Climate Action Plan 2021 are to be met. In this context, the Office is of the view that 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 combined with other environmental and amenity constraints. These elements of the draft Plan should, therefore, be reviewed to ensure that the contribution of County Kerry to realising overall national targets for renewable energy is clearly set out and can be achieved in an appropriate manner.

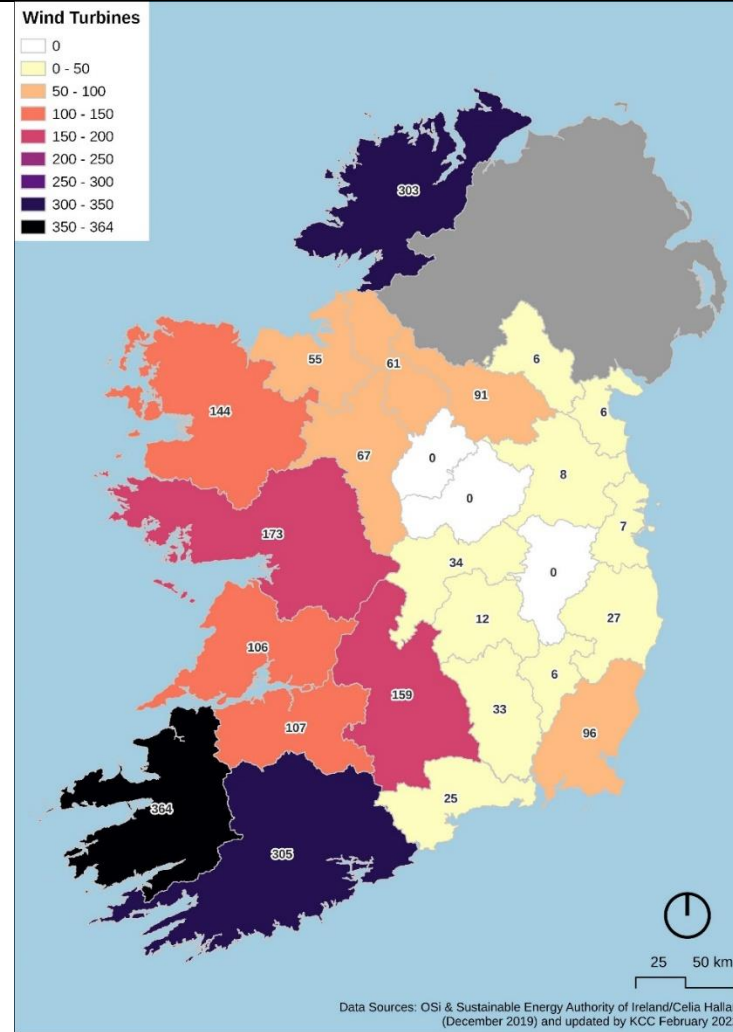
The submission states as a recommendation:

In accordance with the provisions of section 28(1C) of the Act, and having regard to the government's commitment in the Climate Action Plan 2021 to achieve 80% of electricity from renewable sources by 2030, NPO 55 which promotes renewable energy use and generation to meet national targets towards achieving a low carbon economy by 2050, and section 28 guidelines Wind Energy Development Guidelines (2006) and the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017), 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

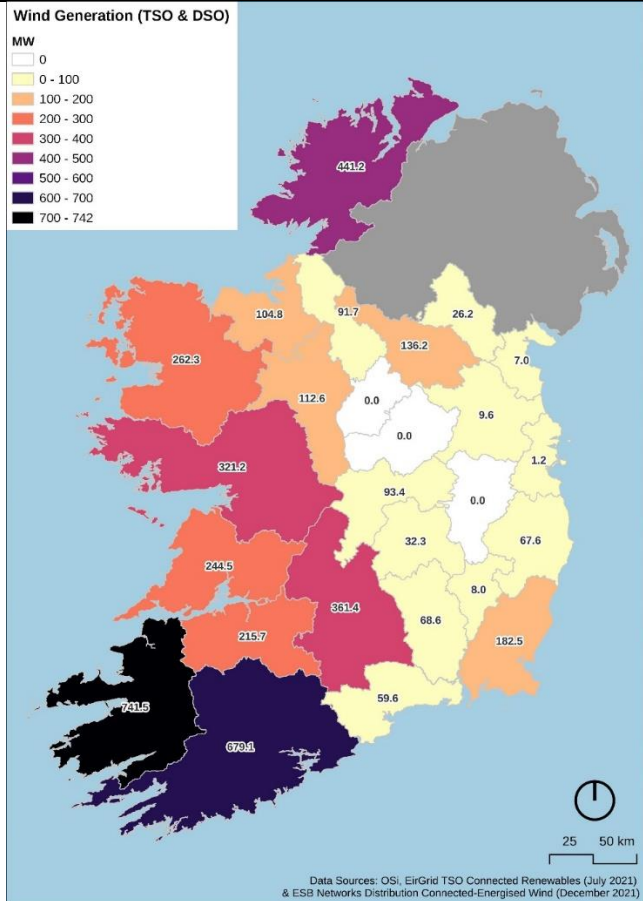
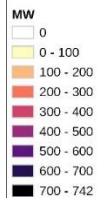
Recommendation 7 – Renewable Energy Targets & Wind Energy**Response:**

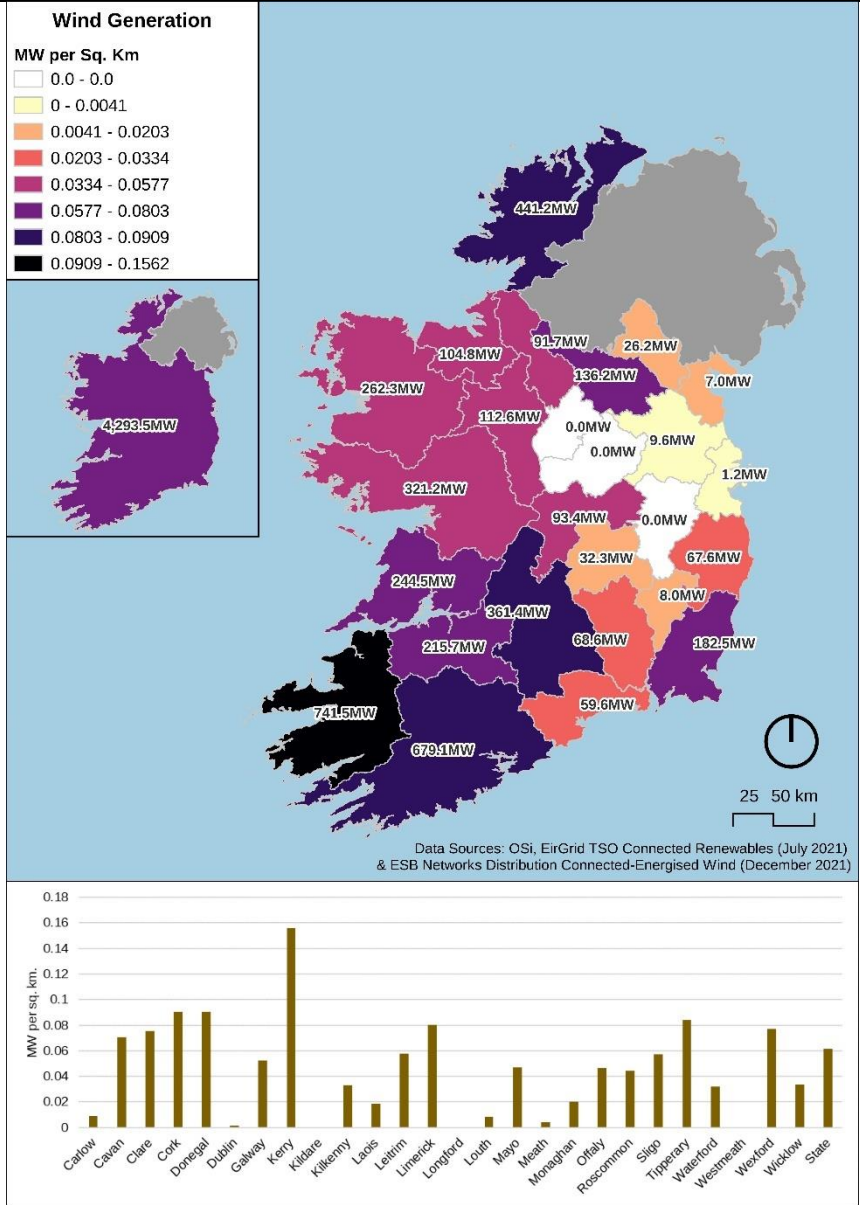
County Kerry has the largest number of installed wind turbines and installed MW output of all Counties in the state and by far the largest installed MW per Sq. km. To date there are 364 wind turbines in the County with a potential output of 742MW notwithstanding the County's internationally renowned 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:

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) remove the exclusion criterion applied in the sieve mapping analysis to exclude areas within 1km of settlements which is inconsistent with item (3) of the SPPR the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017), and revise Map 12.4 'Wind Energy Areas' accordingly.



Wind Generation (TSO & DSO)





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.

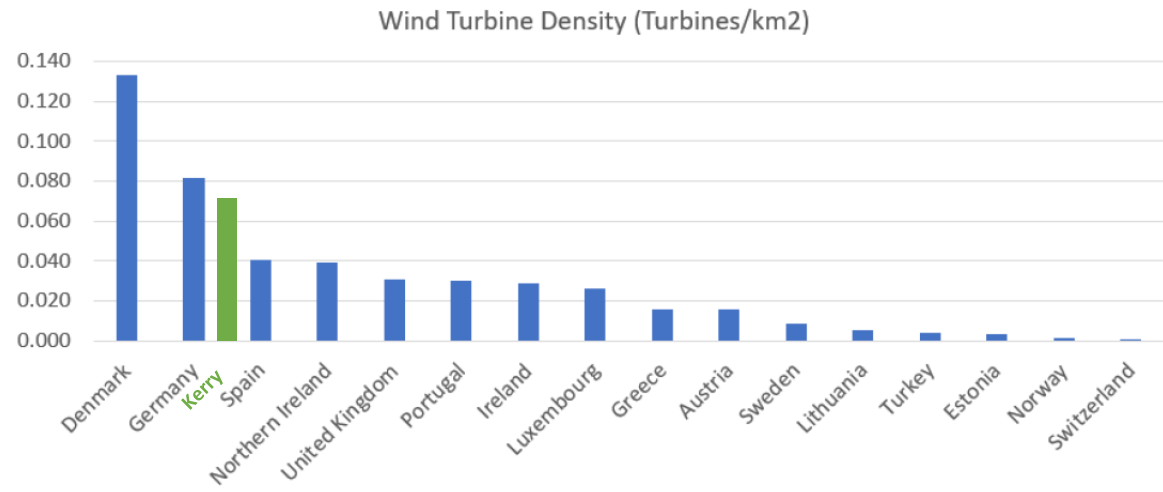


Figure 1: WEI Submission to Draft Kerry County Development Plan 2022-2028 with Kerry added.

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:

<p>Flood Risk</p> <p>The submission states as a recommendation: Having regard to requirements of The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009), as amended by Circular PL 2/2014, the planning authority is required to: (i) carry out the Justification Test for existing built up lands proposed to be zoned for vulnerable uses and, where the planning authority determines that the</p>	<p><u>Hydro.</u> (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 <i>Small Scale Hydro-Electric Potential of Ireland</i>. 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.</p> <p><u>Solar.</u> (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.</p> <p>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.</p> <p>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> <p><u>Bioenergy.</u> (10MW) 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>Recommendations: 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.</p> <p>Recommendation 8 - Flood Risk Response: See O.P.W for detailed response and recommendations</p>
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<p>zoning for vulnerable uses is considered appropriate, specify in the Plan the nature and design of structural or non-structural flood risk management measures required to be put in place prior to the carrying out of future development in such areas; (ii) incorporate all key flooding requirements and mitigation measures identified in the SFRA and Justification Test into the Plan, in particular in respect of those specified for Sites C5.2, C5.4 and R1.6.1 in Tralee, and Sites C5.1, R1.6.1, R1.6.2, R4.6.1, R4.6.2 in Killarney; and (iii) include specific objectives in the plan to ensure development in the following areas is restricted to minor development and to support the requirement for a site specific flood risk assessment - Tralee - Town Centre (M2), Built Up Area (M4), Existing Residential (R2), and Tourism & Related zoned lands; Killarney - Built Up Area (M4), Existing Residential (R2), and Tourism & Related zoned lands C5.2; and Listowel - Town Centre (M2), Built Up Area (M4), and Existing Residential (R2).</p> <p>Monitoring The submission states as an observation: Having regard to the duty and function of the planning authority under section 15(1) and 15(2) of the Planning and Development Act 2000, as amended, and the commitment of the planning authority to secure and monitor the implementation of the strategies, policies and objectives of the draft Plan, the Office advises the planning authority to consider how Appendix 9 'Implementation and Monitoring' could be amended to ensure that any monitoring is strategic in nature consistent with Part 10 of the Development Plans Guidelines for Planning Authorities, Consultation Draft (August 2021).</p> <p>Landuse Zoning Objectives The submission welcomes the adoption of standardised zoning objectives as presented in Volume 6 of the draft Plan, inclusive of a Land Use Zoning Matrix. However the inclusion of defined land use zoning objectives and development</p>	<p>Observation 8 – Monitoring Response: It is the practice of the Council 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. It is appropriate to include additional objectives regarding same, see below.</p> <p>11.General and Procedural Matters 11.1 Landuse Zoning Objectives The Office welcomes the adoption of standardised zoning objectives as presented in Volume 6 of the draft Plan, inclusive of a Land Use Zoning Matrix. However, the inclusion of defined land use zoning objectives and development priorities for each</p>
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<p>priorities for each zoning type, as per the standardised approach set out in Appendix B of Development Plans Guidelines for Planning Authorities - Draft for Consultation (August 2021), would improve clarity and consistency.</p> <p>Errata Climate Action Plan The submission states that: The planning authority should update all references to the Climate Action Plan 2019 with the Climate Action Plan 2021, which was adopted at the latter stages of the draft Plan preparation process.</p> <p>Development of Key Towns The submission welcomes the evident commitment to the development of the County towns such as Tralee, Killarney and Listowel, which is significant in terms of creating a strong local economy, providing a more sustainable pattern of development in response to climate change and protecting the high environmental quality of the county. The Town Plans for these settlements include concrete regeneration initiatives and site-specific projects supporting compact growth, placemaking and quality environments, which can be implemented and monitored over the lifetime of the Plan. Looking forward, and in the absence of land use zoning objectives for the Regional Towns it will be critical that any zoning objectives in the future Local Area Plans (LAPs) are also consistent with the achievement of National Strategic Objective 1 (NSO 1) Compact Growth.</p>	<p>zoning type, as per the standardised approach set out in Appendix B of Development Plans Guidelines for Planning Authorities - Draft for Consultation (August 2021), would improve clarity and consistency.</p> <p>Response: The Council acknowledges the preferred layout of standardised objectives and development priorities as set out in Appendix B of Development Plan Guidelines for Planning Authorities – Draft for Consultation (August 2021). The Land-Use Zoning document as contained in Volume 6 of the Draft Plan has been amended to reflect the standardised approach as set out in the Draft Guidelines.</p> <p>11.2 Inconsistencies and other issues The planning authority should update all references to the Climate Action Plan 2019 with the Climate Action Plan 2021, which was adopted at the latter stages of the draft Plan preparation process. Response: Errata - All reference to 2019 have been replaced with 2021.</p> <p>Noted</p>
<p>Recommendations</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>	

Amend Tables 1-3 of the Settlement capacity Audit to include a potential housing yield for each site.

Amend Core Strategy Map

Indicate clearly on the zoning maps for Tralee, Killarney & Listowel those zoned lands in the environs with a zoning which will entail removing the hatching from these areas.

In Table 3.6 Settlement Hierarchy reposition Milltown as a District Town.

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.**

Amend Sections 3.10.3 and 3.11 as follows;

3.10.3 Population Distribution

The population growth allocation for Tralee and Killarney is **4,371**. This growth allocation will ensure that these Key Towns will grow by over 30% by 2040 (in accordance with the RSES) positioning these settlements as sufficiently sized urban zones to attract additional employment and population, which will increase their competitiveness and attractiveness as national and regional investment locations.

Settlement		Population		Housing		Land Zoning Required	
		Population 2016	Population 2022 (est.)	2022-2028 Pop.	Housing Target	Existing Zoned Land (ha)	Zoned Land Required (ha)
County		147,707	156,902	9,363	7,000		
Key Town	Tralee	23,691	25,297	2,711	2,124	85.1	85.0
	Killarney	14,504	15,487	1,660	1,301	67.3	67.3
		38,195	40,784	4,371	3,425		
Regional Town	Listowel	4,820	5,127	529	415	10.8	10.8
	Castleisland	2,486	2,644	359	281	9.2	See Objective KCDP 3-7a
	Kenmare	2,376	2,527	261	204	29.9**	
	Killorglin	2,199	2,339	320	251	20.6**	
	Dingle/ Daingean Uí Chúis	2,050	2,181	282	221	17.5	
	Ballybunion	1,413	1,503	204	160	7.1	
	Cahersiveen	1,041	1,107	129	101	4.7	
		17,313	18,417	2,084	1,633		
District Town	Ardfert	749	797	78	61	6.5	See Objective KCDP 3-7a
	Ballyheigue	724	770	77	60	2.6	
	Ballylongford	391	416	45	35	1.1	
	Barraduff	170	308	57	45	2.4	
	Castlemaine	176	187	37	29	3.3	
	Farranfore	175	186	37	29	7.1	
	Fenit	538	572	112	88	6.6	
	Feries	558	594	46	36	1.5	
Kilcummin	435	463	40	31	2.2		

	Milltown*	928	987	218	171	6.1	
	Rathmore	790	840	73	57	4.2	
	Sneem	288	306	27	21	0.0	
	Tarbert	540	574	57	45	3.1	
	Waterville	462	491	52	41	3.1	
		6,924	7,492	956	749		
	Villages	6,698	7,125	552	432		
	Small Village Settlements	1,547	1,646	465	186		
	Rural Area	77,958	82,425	936	575		
* Having regard to the planned investment and masterplan for Milltown by Kerry County Council and allied partners, its appropriateness to be included as a regional town will be examined as part of the 2-year Review of the Development Plan.							
** Existing zoning in Kenmare is that which is included in the Kenmare Functional Area Local Area Plan 2010-2016 and existing zoning in Killorglin is that which is included in the Killorglin Functional Area Local Area Plan 2010-2016, both prepared prior to the adoption of a Core Strategy.							

Table 3.7: Population & Housing Growth 2022-2028

In allocating future population growth to other settlements, the following guiding principles were considered:

- Scale of population and its existing performance.
- Scale of employment provision, number of jobs, jobs-to-resident worker's ratio, and net commuting flows; Balance between population growth and employment provision.
- Compliance with the NPF (NPO 72) on a standardised, tiered approach that differentiates between 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 availability and deliverability of lands within the existing built-up footprints.
- Extent of local services and amenities including education, health, leisure, and retail.
- Extent to which sustainable modes of travel can be encouraged (walking, cycling or public transport).
- Rate and pace of past development and the extent to which there are outstanding requirements for infrastructure and amenities.
- Accessibility and influence in a regional/sub-regional/county context.
- Character of local geography and accessibility as a service centre for remote and long-distance rural hinterlands.
- Environmental and infrastructural constraints.
- The appropriate density and scale of development relative to the settlement and location, incl. differing rates and nature of development experienced.
- Need for attractive, alternative options to rural housing within smaller towns and villages.

The allocation of population/housing has generally followed the scale of proportionality of existing settlement scale. Some District towns have been allocated increased levels of growth relative to other towns in that category. This has been done to ensure a balance between social and private development in these settlements due to Kerry County Council's housing programme. There are also some capacity issues in relation to wastewater infrastructure and have been allocated a housing target that reflects this capacity.

There are no proposals to increase the population of settlements beyond 30% over 2016 census levels, with the exception of Barraduff which has not been included as a settlement to date by the CSO.

The remaining population growth of 4,992 is allocated to other towns in the County and the rural area. This will ensure that development in these towns is commensurate with the scale of these towns and the provision of additional employment.

3.11 The Zoning of Land for Residential Development

The zoning of lands in the current Municipal District / Electoral Area Local Area Plans (LAP's) is consistent with the existing and proposed core strategy.

These LAP's will be updated/replaced over the lifetime of this plan (in line with the core strategy) in a logical and informed manner which will provide for the long-term sustainable development of the settlements and of the County as a whole.

This Plan does not set out a quantum of lands to be zoned residential in order to meet the proposed population growth. The zoning of residential land will occur as part of the relevant settlement Local Area Plan (LAP) taking into consideration the level of housing demand indicated in the core strategy (see also Section 3.10), and a Settlement Capacity Audit of these settlements.

The zoning of residential land (outside of the settlements of Tralee, Killarney, and Listowel) will occur as part of the relevant settlement Local Area Plan (LAP) taking into consideration the level of housing demand indicated in Table 3.7. This quantum will be calculated taking cognisance of the Ministerial guidelines; *Sustainable Residential Development in Urban Areas and Urban Development and Building Heights* in relation to densities. In general housing densities will be higher closer to the town and village centre and lower towards the edge of settlement. In the majority of settlements infill and vacant sites are available within close proximity to the town/village centre. It is proposed to prioritise the development of residential units on these vacant and infill sites.

However, a lower residential density figure may have to be applied to some settlements and development sites, depending on their tier within the settlement hierarchy and location within a settlement. Where lower densities are identified within settlements, the rationale for so doing will be based on the requirement to meet the housing needs for both urban and rural areas, with particular focus on providing a real alternative to urban generated development in the open countryside and providing scope and choice within the housing market.

Zoning Maps for Tralee, Killarney & Listowel are included in Volume 2 of the Draft Kerry County Development Plan 2022-2028. As per Table 3.7, the Zoned Land Required, has been determined based on the Settlement Capacity Audit contained in Volume 2 for these settlements. It is proposed to phase residential lands in Tralee and Killarney in order to meet the housing targets of these settlements allowing for the contribution of brownfield/infill sites and to reflect the tiered approach to zoning.

Residential Zoning

It is an objective of the Council to:

KCDP 3-6 Zone land for residential purposes in accordance with the Tiered approach outlined in the National Planning Framework.

KCDP 3-7 Prepare a local area plan for each settlement identified in the settlement hierarchy.

KCDP 3-7a Prepare a Settlement Capacity Audit for each Regional Town and District Town where lands are zoned residential in their respective Local Area Plan which shall inform the zoned land requirements for these settlements.

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.

Amend TR 34 - Facilitate and support the incorporation and redevelopment of Casement Station Plaza and Austin Stack Plaza into the John Joe Sheehy Road Masterplan

(iii) Insert objective; **To monitor the implementation of compact growth as per Appendix 9 Implementation & Monitoring**

Amend wording in 1.5.4.6

- 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.

A minimum driveway length of 6 m. should be maintained where appropriate *to the site context*

It is recommended that 'Traveller Accommodation' is included in the Zoning Matrix contained in Volumes 2 and 6 of the Draft Plan.

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.

Amend objectives 5-12 (d) & (e) and 5-13(d) as above.

It is considered appropriate to omit the settlement of ~~Baile na nGall~~ from Table 5.1.

Include a map indicating minerals & aggregates across the County.

Amend Objective 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).

Amend Objective 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*

Insert New Objectives; Ensure the development plan is consistent with the approach to climate action recommended in the revised Development Plans, Guidelines for Planning Authorities – Draft for Consultation (August 2021) as adopted or any other relevant guidelines, and vary the Plan as may be required.

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'.

Insert New Objectives re monitoring/reviewing as follows;

To prepare a preliminary monitoring evaluation report on the likely significant environmental effects of implementing the Plan (subject to the availability of adequate resources) within two years of the making of the Plan (as per section 15) of the Environmental Report. (This could coincide with 2nd annual review of the Plan on the progress achieved in securing the Plan objectives)

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.

Include a revised Land-Use Zoning section in Volume 6.

Replace Climate Action Plan 2019 with the Climate Action Plan *2021* throughout the plan.

Renewable /wind

Update the Wind Zoning Methodology in Volume 1 Appendices.

Amend Section 12.5.4.1.3 as follows;

12.5.4.1.3 Wind Energy Policy Areas

In line with national guidance, areas of the County have been designated as 'Open for Consideration'. 'Repower areas' have also been identified. The methodology for the designation of these areas is outlined in *Wind Zoning Methodology* Volume 1, Appendix 6. Applications for windfarms in these areas will be assessed on a case-by-case basis, subject to viable wind speeds, environmental resources and constraints and cumulative impacts in compliance with Article 6 of the Habitats and EIA Directives. 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. Areas outside 'Areas Open to Consideration' and 'Repower areas' are not deemed suitable for commercial wind farm development because of their overall sensitivity arising from landscape, ecological, recreational and or cultural and built heritage resources.

A suitably scaled community wind energy project may be considered in areas not deemed suitable for commercial wind farm developments. They may 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*.

Amend Section 12.5.4.1.6 as follows;

12.5.4.1.6 Unsuitable for Wind Development

These areas are not considered suitable for commercial wind farm development due to visual, environmental or ecological sensitivities or the potential impact on recreational or cultural facilities or on sensitive receptors.

Amend Objectives KCDP 12-33 and KCDP 12-34 as follows;

KCDP 12-33 Ensure that community benefits are derived from all renewable energy development in the county, including those subject to repowering or extension applications.

KCDP 12-34 Facilitate suitably scaled community owned/led sustainable renewable energy projects in appropriate locations, including areas outside of open to consideration and repower areas. This will include requirements and considerations in relation to: residential amenity, landscape; cultural heritage; Natura 2000 sites and the Habitats & Birds Directive; the objectives of the Water Framework Directive; Flood Directive; and electricity infrastructure.

KE-C1-378 Department of Environment, Climate and Communications

Summary

The submission relates primarily to the promotion and development of district heating as a technology that can contribute to reduction of Greenhouse Gas emissions.

It states that the draft County Development Plan does not appear to contain the local authority's position in relation to development of district heating schemes as a standalone technology that can contribute to reduction of Greenhouse Gas emissions. The local authority is requested to make provision for analysis of areas of high heat demand in the county in order to inform its position on development of district heating systems.

Response

It is an Objective KCDP 12-28 of the plan to promote and facilitate the installation of district heating schemes powered by renewable fuel sources that are produced in a sustainable manner. The Council have been proactive in the installation of such technology with particular regard to the Mitchels Regeneration Project in Tralee.

The Local Authority's objective (KCP 12-5) to facilitate use of waste heat from data centres in district heating schemes in the context of sustainable development of data centres is noted.

Recommendation

No proposed amendments

KE-C1-383 Department of Education

Summary	Response
<p>The submission states that the draft plan contains a number of objectives relating to schools in that are generally welcomed by the Department.</p> <p>The Department suggests in the interests of accuracy that Objective KCDP 6-41 in regard to the reservation of lands for future school requirements be re-worded along the following lines: Facilitate the Department of Education in planning for potential future school requirements by reserving lands, at appropriate locations, for such uses in the Local Area Plans. This is to reflect the joint responsibility of the Department of Education and the Local Authority to work together in order to ensure that appropriate land is zoned to meet future school requirements. The other stakeholders, (of which Kerry ETB is a very important stakeholder) are reliant on this engagement as it ensures that land is zoned to enable delivery of future schools as required.</p>	<p>Kerry County Council will actively facilitate the principle of permitting schools, both permanent and temporary, in as many zoning categories as possible.</p> <p>The primary role of the Council is to reserve sufficient land within the identified development centres to meet likely future demands for community facilities including education. The Council will continue to ensure the provision of educational facilities in a planned and coordinated and implemented in concert with residential development, especially where this is undertaken in the context of Local Area Plans or Masterplans (such as Lohercannon). The wording of objective KCDP 6-4 is considered adequate in this regard.</p> <p>It is noted that the level of projected increased requirements is such that it is anticipated that the existing schools (or expansion thereof) could meet the potential requirements arising from the increased population.</p>
<p>Recommendations</p> <p>No proposed amendments</p>	

KE-C1-389 National Transport Authority

Summary	Response
<p>The NTA notes the emphasis which Section 14.3.4 places on the integration of land use and transportation and would support its implementation, in complement with the NTA Guiding Principles.</p> <p>The NTA, supports the preparation of Local Transport Plans (LTP), as stated in Section 14.3.4 and Objective KCDP 14.22, for the key towns of Tralee and Killarney, based on the ABTA guidance produced by the NTA and TII, in alignment with LAPs, ‘to enable the integration of land use and transportation over the lifetime of this plan’.</p> <p>It requests that Objective KCDP 14-5 be amended to read: Specify baseline figures and targets for modal share in new/varied Local Area Plans AS INFORMED BY THE PREPARATION OF LOCAL TRANSPORT PLANS ... to encourage a modal shift away from the private car to more sustainable forms of transport, such as public transport, cycling and walking.</p>	<p>The Plan supports the promotion of sustainable transport solutions and investment in sustainable transport infrastructure within and between settlements. However, the Council also acknowledges that the ability to deliver on these objectives will be contingent on the Development Plan’s effectiveness in enabling the consolidation of urban generated growth within the County’s urban settlements. It is therefore recommended to amend Objectives KCDP 14-5 and KCDP 14-6 as set out in the recommendations below.</p>

<p>KCDP Objective 14-6: Set modal share targets AS A DEVELOPMENT PLAN INDICATOR within the County in cooperation with the NTA, TII, ...CARO, SRA and other relevant stakeholders and in accordance with any relevant Guidelines that may come into effect.</p> <p>In identifying mode share targets for the County's towns, across a range of journey purposes, it is recommended that a profiling of travel patterns is undertaken, through an interrogation of existing transport data, by mode and by journey purpose, in order to better understand transport demand and associated travel patterns and what influences/determines them.</p> <p>In s14.3.3.1 <i>Active Travel and Greenways</i>, it recommends that Objective KCDP 14-10: Facilitate and support the development of Transport Mobility Plans LOCAL TRANSPORT PLANS for Tralee, Killarney and Listowel ... and the subsequent rollout of Active Travel related infrastructure in these towns.</p> <p>Objective KCDP 14-16: Facilitate and support the provision of bicycle parking facilities IN NEW DEVELOPMENTS, AS SET OUT IN THE DEVELOPMENT PLAN'S CYCLE PARKING STANDARDS AND IN THE PUBLIC REALM ...throughout the county's settlements.</p> <p>Objective KCDP 14-17: Develop a masterplan for all cycle paths and greenways in the county IN CONJUNCTION WITH THE NTA AND TII ...and to improve connectivity within the region for walking routes and commuter cyclists in addition to recreational amenity functions.</p> <p>The submission recommends the following amendments;</p> <p>Objective KCDP 14-15: Support accessibility to greenway and active travel walking routes for people of all ages and those with disabilities WITH PROVISION FOR UNIVERSAL DESIGN.</p> <p>Objective KCDP 14-19: Improve access for all vulnerable road users and people with disability to all modes of transport WITH PROVISION FOR UNIVERSAL DESIGN ...thereby increasing and improving transport facilities for all users.</p> <p>The submission recommends the following amendments;</p> <p>In s14.3.4 Land Use Integration and Local Transport Plans; amend Objective KCDP 14-18: Enhance and improve regional connectivity through upgraded transport infrastructure AND EFFECTIVE PUBLIC TRANSPORT SERVICES.</p>	<p>It is acknowledged that in identifying modal share targets for the County's towns, that a profiling/survey of travel patterns is necessary. This will be undertaken as part of the future plan preparation.</p> <p>The amendment to Objective KCDP 14-10 is as set out in the recommendations below.</p> <p>The amendment to Objective KCDP 14-16 is as set out in the recommendations below.</p> <p>The amendment to Objective KCDP 14-17 is as set out in the recommendations below.</p> <p><u>Universal Design</u></p> <p>The plan contains policies and objectives (sections 6.2.4 & 14) which promote universal design in the external built environment. It is considered prudent to amend Objectives KCDP 14-15 and 14-19 to refer to universal design;</p> <p><u>Local Transport Plans</u></p> <p>As stated in Section 14.3.4 Local Transport Plans (LTPs) will be prepared by the Council for the key towns of Tralee and Killarney, based on the Area Based Transport Assessment (ABTA) guidance produced by the NTA and Transport Infrastructure Ireland (TII).</p> <p>As it is the intention of the Council to prepare a transport strategy at county level, it is recommended that this is also referenced under Section 14.3.4 Land Use Integration and Local Transport Plans.</p>
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<p>Objective KCDP 14-22: Prepare Local Transport Plans for the Key Towns, IN CONSULTATION WITH THE NTA and other settlements where appropriate which shall be aligned to and integrated with relevant Local Area Plans.</p> <p>In s14.4 Road Network, it recommends that Objectives relating to road network should be informed by the preparation of transport plans at county and local levels, as intended by the Council.</p> <p>In s14.4.3 Parking Provision & comments under Volume 6, Section 1.20.7 (Car Parking Standards), the NTA would recommend the application of Maximum car parking standards, as recommended in the NTA’s submission on the Pre-Draft Issues Paper. In locations where the highest intensity of development occurs such as town centres, an approach that caps car parking on an area-wide basis should be considered. Furthermore, it is recommended that in order to determine the most appropriate level of parking provision within defined maximum standards, criteria relating to public transport accessibility levels (PTALS) and access to opportunities and services (ATOS) should be applied, from which degrees of constraint can then be applied. Within the larger urban settlements, the development of parking strategies encompassing all aspects of parking provision and parking management would be best informed by the preparation of Local Transport Plans.</p> <p>It is requested that Objective KCDP 14-36 be amended: Support and facilitate the sustainable provision of public parking facilities for all users at appropriate locations, TO BE INFORMED BY PARKING STRATEGIES, ...including bus parking and electric vehicles within and on the edge of towns and villages, and at tourist and recreation sites such as beaches, walkway/cycleway trailheads, scenic viewing points and routes subject to compliance with any environmental designation requirements.</p> <p>In relation to s14.5 Public Transport it is stated; Regarding “ ... Kerry County Council will facilitate and support the NTA in its preparation of a County Transport Strategy ...”, it needs to be clarified what a County Transport Strategy would be, in the context of the Development Plan. It is assumed that such would be undertaken on the basis of the NTA/TII ABTA Pilot Methodology, which is applicable at both Development Plan and Local Area Plan levels.</p> <p>It states that, the NTA is committed to working with Kerry County Council and other local authorities in their preparation of Local Transport Plans, focused on key towns and other larger settlements (to be determined by the local authorities). Should a transport strategy be</p>	<p>Amendments to Objectives KCDP 14-18 and 14-22 are set out in the recommendations section.</p> <p><u>Parking</u></p> <p>The NTA recommend the application of <u>Maximum</u> car parking standards, and an approach that caps car parking on an area-wide basis should be considered. See Response to Submission KE-C1-365 OPR. The council are currently preparing a parking strategy for the county. Parking standards will be informed/assessed in line with this strategy and the local transport Plans.</p> <p>It is considered appropriate to amend Objective KCDP 14-36 as set out in the recommendations below.</p> <p><u>Public Transport</u></p> <p>It is acknowledged that the Council will be the lead agent in the preparation of a County Transport Strategy and the Local transport plans and will be supported by the NTA, this will be reflected in the text as outlined in the recommendations below for Section 14.5 and Objective KCDP 14-47.</p>
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undertaken at County level, the NTA would expect to be working in a supporting role with the Council.

The NTA recommends the following amendment to Section 14.5: 'The NTA ~~Kerry County Council~~ will facilitate and support Kerry County Council the NTA in its preparation of a County Transport Strategy'.

In relation to bus service planning at county level, it is recommended that the Connecting Ireland process is taken into consideration in the preparation of the Development Plan and the formulation of objectives as they relate to public transport serving settlements and rural areas. It requests that the following objectives be amended;

Objective KCDP 14-46: Facilitate improved rural public transport services including the provision of public and private bus services under the Rural Transport Programme and improved bus infrastructure including bus stops/shelters at appropriate locations AND TAKING INTO CONSIDERATION THE RECOMMENDATIONS OF THE CONNECTING IRELAND PROCESS.

Objective KCDP 14-47: THE COUNCIL WILL PREPARE A COUNTY TRANSPORT STRATEGY AND LOCAL TRANSPORT PLAN, FACILITATED AND SUPPORTED BY THE NTA [~~Facilitate and support the NTA in its preparation of a County Transport Strategy and Local Transport Plans.~~]

In the Tralee Town Development Plan - Transportation (Tralee Transport Strategy and Mobility Plan, Objective TR 98). It is recommended that all references to 'Tralee Transport Strategy and Mobility Plan' are amended to 'Tralee Local Transport Plan'.

In the Killarney Town Development Plan - Transportation (Killarney Transport and Mobility Plan, Objective KA 73). It is recommended that all references to 'Killarney Transport Strategy and Mobility Plan' are amended to 'Killarney Local Transport Plan'.

Regarding s1.20.7 Car Parking Standards (including Table 4: Parking Requirements) in Vol6, it is stated that the NTA would not support the Draft Plan's current approach to the provision of car parking for different types of development. It states that, it is not clear whether or not the standards specified are minimum or maximum standards, rather it is indicated that 'a flexible approach to these standards may be applied where such a case is substantiated ... that the standard should be adjusted to facilitate the site-specific context'.

It states that maximum car parking standards should be specified, as recommended in the NTA's submission on the Pre-Draft Issues Paper. In addition, in locations where the highest intensity of development occurs such as town centres, an approach that caps car parking on an area-wide basis should be considered. Furthermore, it is recommended that in order to

Connecting Ireland

The Council acknowledges that the NTA has been working with local authorities in the development of Connecting Ireland, the objective of which is to improve the quantity, quality and utility of public transport outside of the major urban areas; to introduce a systematic and strategic approach to planning new routes and services and to apply a partnership approach to bus network planning. It is therefore prudent to include the above text and amend Objectives KCDP 14-46 and 14-47 as set out in the recommendations below.

The points raised in relation to the Tralee and Killarney Town Development Plans are noted and amendments are set out in the recommendations section below.

Regarding car parking standards see response to KE-C1-365

determine the most appropriate level of parking provision within defined maximum standards, criteria relating to public transport accessibility levels (PTALS) and access to opportunities and services (ATOS) should be applied, from which degrees of constraint can then be applied.

Within the larger urban settlements, this approach would be best supported by the preparation of Local Transport Plans.

Regarding s1.20.9 Bicycle Parking Standards, (including Table 4) vol6, it states that cycle parking at trip origins and destinations is a key factor in determining mode choice, and should be appropriately designed into the urban realm and new developments to ensure that adequate facilities are provided. In this regard, the inclusion of Bicycle Parking Standards, specified as minima in the Draft Plan is recommended.

In relation to Table 4, it is also noted that cycle parking standards have not been specified for a broad range of employment and other trip destination uses, including inter alia 'Industrial, Hotels and Warehousing'. The rationale for this selective approach is not clear and on the other hand, paragraph 1.20.9 states that 'secure cycle parking facilities shall be provided in new ... retail and employment generating development'. It is considered that the overall approach to the provision of cycle parking in new developments requires clarification.

EV charging facilities

It is stated that it is essential that the Development Plan sets out a clear pathway as to how the local authority, within its remit, will contribute to the decarbonisation of the transport fleet over the period of the Development Plan and beyond. The NTA would therefore welcome a commitment in the Development Plan to the provision for electric vehicles across both residential and non-residential land uses. It is noted that Policy KCDP 14-37 refers specifically to the 'provision of electric charging facilities in car parks provided as part of commercial large retail or industrial developments.

The NTA recommends that the Draft Plan specifies a minimum provision for EVs, expressed as a percentage of total car parking provision, for residential and non-residential developments and these are amended as necessary, taking into consideration the objectives of the Climate Action Plan.

It is noted that the Climate Action Plan 2019 set out targets relating to the Transport sector and that The Climate Action Plan 2021 indicates in Section 15.3.3 (Fleet Electrification) that

Bicycle Parking

The standards for the provisions of bicycle parking are set out in section 1.20.9. It is considered that these standards as set out in Table 4 are sufficient to cater for an adequate provision of spaces. It is considered impractical to stipulate a specific requirement to many uses such as industrial/sports club etc. It is however considered prudent to include a requirement that all new development included in any of the land use classes should provide a bicycle parking bay/bike shelter as set out in the recommendations section below.

EV charging facilities

It is the policy of the plan to facilitate, provide and promote the sustainable development of Electric Vehicle charging at appropriate locations throughout the county. This is supported by objectives KCDP 2-12 and KCDP 12-11.

See Response to Submission KE-C1-330 [ESB] whereby amendments are proposed which state that a minimum of 1 EV charge point space per five car parking spaces (ducting for every parking space shall also be provided).

The draft plan refers to The Climate Action Plan 2019 & 2021. It is not considered feasible to or practical that the Development Plan sets out a clear pathway as to how the local authority,

‘Additional measures that will be put in place to accelerate and support the major transition to EVs’.	within its remit, will contribute to the decarbonisation of the transport fleet over the period of the Development Plan and beyond. This is an issue for the future Corporate Plan.
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Recommendations

Amend Objective KCDP 14-5: Specify baseline figures and targets for modal share in new/varied Local Area Plans **as informed by the preparation of local transport plans...**

Amend Objective KCDP 14-6: Set modal share targets *as a Development Plan Indicator* within the County in cooperation with the NTA, **TII,.**

Objective KCDP 14-10: Facilitate and support the development of ~~Transport Mobility Plans~~ **LOCAL TRANSPORT PLANS** for Tralee, Killarney and Listowel ... and the subsequent rollout of Active Travel related infrastructure in these towns.

Objective KCDP 14-16: Facilitate and support the provision of bicycle parking facilities **IN NEW DEVELOPMENTS, AS SET OUT IN THE DEVELOPMENT PLAN’S CYCLE PARKING STANDARDS AND IN THE PUBLIC REALM** ...throughout the county’s settlements.

Objective KCDP 14-17: Develop a masterplan for all cycle paths and greenways in the county **IN CONJUNCTION WITH THE NTA AND TII** ...and to improve connectivity within the region for walking routes and commuter cyclists in addition to recreational amenity functions.

Objective KCDP 14-18: Enhance and improve regional connectivity through upgraded transport infrastructure **AND EFFECTIVE PUBLIC TRANSPORT SERVICES.**

All references to ‘Tralee and Killarney Transport Strategy and Mobility Plan’ are amended to ‘**Tralee or Killarney Local Transport Plan**’

Objective KCDP 14-22: Prepare Local Transport Plans for the Key Towns, **IN CONSULTATION WITH THE NTA** and other settlements where appropriate which shall be aligned to and integrated with relevant Local Area Plans.

Objective KCDP 14-15: Support accessibility to greenway and active travel walking routes for people of all ages and those with disabilities **WITH PROVISION FOR UNIVERSAL DESIGN.**

Objective KCDP 14-19: Improve access for all vulnerable road users and people with disability to all modes of transport **WITH PROVISION FOR UNIVERSAL DESIGN** ...thereby increasing and improving transport facilities for all users.

Objective KCDP 14-18: Enhance and improve regional connectivity through upgraded transport infrastructure **AND EFFECTIVE PUBLIC TRANSPORT SERVICES.**

Objective KCDP 14-22: Prepare Local Transport Plans for the Key Towns, **IN CONSULTATION WITH THE NTA** and other settlements where appropriate which shall be aligned to and integrated with relevant Local Area Plans.

Objective KCDP 14-36: Support and facilitate the sustainable provision of public parking facilities for all users at appropriate locations, **TO BE INFORMED BY PARKING STRATEGIES,** ...including bus parking and electric vehicles within and on the edge of towns and villages, and at tourist and recreation sites such as beaches, walkway/cycleway trailheads, scenic viewing points and routes subject to compliance with any environmental designation requirements.

Amend Section 14.5: ‘The **NTA** ~~Kerry County Council~~ will facilitate and support **Kerry County Council** the ~~NTA~~ in its preparation of a County Transport Strategy’

Amend Objective KCDP 14-47: ~~Facilitate and support the NTA in its preparation of a County Transport Strategy and Local Transport Plans.~~ **THE COUNCIL WILL PREPARE A COUNTY TRANSPORT STRATEGY AND LOCAL TRANSPORT PLAN, FACILITATED AND SUPPORTED BY THE NTA**

Objective KCDP 14-46: Facilitate improved rural public transport services including the provision of public and private bus services under the Rural Transport Programme and improved bus infrastructure including bus stops/shelters at appropriate locations **AND TAKING INTO CONSIDERATION THE RECOMMENDATIONS OF THE CONNECTING IRELAND PROCESS.**

Amend references to 'Tralee Transport Strategy and Mobility Plan' to '**Tralee Local Transport Plan**', within the Tralee Town Development Plan.

Amend references to 'Killarney Transport Strategy and Mobility Plan' to '**Killarney Local Transport Plan**', within the Killarney Town Development Plan.

Add additional wording to Section 1.20.9. Development Management Standards to include a requirement that **all new development included in any of the land use classes should provide a bicycle parking bay/bike shelter.**

**Chief Executive's Report on Draft Plan Public Consultation
Draft Kerry County Development Plan 2022-2028
General Submissions**

Chapter Summaries	Topic Summaries
Chapter 1 – Introduction	Kerry County Development Plan 2022-2028 and Purpose, Vision and Goals.
	County Overview, Plan Review Process and Monitoring and Implementation, Sustainable Development Interpretation and Planning Policy Context.
Chapter 2 - Climate Change & Achieving a Sustainable Future	Climate Change and Planning and Local Context
	Kerry County Development Plan 2022-2028 - Climate Action
Chapter 3 – Core & Settlement Strategy	Introduction, Core Strategy Map, Future Population Growth, Sustainable Countywide Development and Populations Projections & Spatial Distribution
	Settlement Strategy, The Zoning of Land for Residential Development and Core Strategy Statement
Chapter 4 – Towns & Villages	Introduction, Urban Regeneration and Compact Growth
	Active Land Management and Retail
Chapter 5 – Rural Housing	Policy Context, Planning for the Future Growth and Development of Rural Areas and Cluster Developments in Village Settlements
	Rural Housing
	Holiday / Second Homes and Renovation and Restoration of Existing and Vacant Buildings Situated in Rural Areas
Chapter 6 – Sustainable Communities	Introduction & Sustainable Living
	Community Infrastructure, Services and Facilities
Chapter 7 – Housing for All	The Housing Strategy and the Housing Need Demand Assessment (HNDA), Housing Policies, Homelessness, Housing Options for Older People and Address Vacancy in Housing.
Chapter 8 – Gaeltacht Areas, Culture & Heritage	Gaeltacht Areas
	Archaeological Heritage
	Built Architectural Heritage
Chapter 9 – Economic Development	Introduction, Economic Resilience, Policy Context and Sustainable Economic Development and Climate Action
	Economic Regions of Regional Economic Significance
	Economic Regions of Regional Economic Significance - Kerry Hub & Knowledge Triangle
	Employment Profile and Land Use Planning for Economic Development
	Economic Sectors and Opportunities
Chapter 10 – Tourism & Outdoor Recreation	Policy Context
	Tourism in County Kerry
	Tourism and Outdoor Recreation Categories
Chapter 11 – Environment	Introduction
	Biodiversity
	Air, Noise and Light Pollution, Marine and Land Use & Flood Risk Management
	Landscape - Visually Sensitive Areas, Landscape Character Assessment and Views and Prospects
Chapter 12 – Energy	Introduction, Gas Network and Transmission Grid and Energy Conservation
	Gas Network – Tarbert/Ballylongford Landbank

	Renewable Energy – Wind Energy, Bioenergy & District Heating, Battery Storage for Renewable Energy, Community Consultation, Community Benefit & Microgeneration/Community Projects
	Wind Energy Development – Scartaglin Region
	Wind Energy Development – Duagh
Chapter 13 – Water and Waste Management	Introduction, Water Quality and Resources
	Waste Management
Chapter 14 – Connectivity	Planning Policy Context, Sustainable Travel and Road Network
	Public Transport (Rail & Bus), Air Transport and Ports, Harbours & Piers
	Digital Connectivity
Volume 1 Appendices	Appendix 6 – Wind Zoning Methodology
Volume 2 – Town Development Plans	Tralee
	Tralee - Land Use Zoning and Flood Maps
	Killarney
	Killarney – Land Use Zoning
	Listowel
	Listowel – Land Use Zoning
Volume 3 – Heritage	1. List of Public rights of Way
	3. National Monuments & Registered Monuments
	5. Record of Protected Structures
	6. Additions to the Record of Protected Structures
	7. Architectural Conservation Areas
Volume 4 – Maps	6. Tarbert – Ballylongford Landbank
Volume 5 – Environmental Reports	1. Strategic Environmental Assessment (SEA)
Volume 6 – Other Documents	1. Development Management Standards & Guidelines
	2. Land-Use Zoning
	2. Land-Use Zoning – Local Area Plans (LAPs)

Chapter 1 – Introduction

Chapter 1 – Introduction - Kerry County Development Plan 2022-2028 and Purpose, Vision and Goals		
	Submission Summaries	CE Response and Recommendations
KE-C1-363 NEWKD	This submission states that stakeholders, such as trade unions and trade councils, who had been consulted previously, should be specifically mentioned and included in the consultation process. It further states that ongoing, improved and appropriate communication is requested – using relevant media channels – to inform the public and all stakeholders in our communities, regarding the status of developments (e.g., Island of Geese).	Statutory consultees are notified about the County Development Plan review process and therefore have the opportunity to review the Draft Plan and submit their views for consideration. 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 and webinars.
KE-C1-165 Kate Carmody	- The submission states that the council's policies on public consultation are ineffective, Kerry County council needs to recognise the citizen as an active participant in our future energy systems.	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 and webinars.
KE-C1-375 Southern Region Waste Management Office	The submission welcomes reference to the Circular Economy and the different benefits, including environmental and economic, that arise from applying the concept of the Circular Economy.	Comment noted and welcomed.
KE-C1-346 Kerry Green Party	<p>The submission states that an additional goal should be added, “Enhancement of the biodiversity in the County.” The submissions rational for this is that in 2019, Ireland became the second country to declare a climate and biodiversity emergency and in addition, there are plans to form a citizens’ assembly on biodiversity in April 2022. It is very concerning that during a stated biodiversity emergency, there is no reference in any of the goals of the plan to enhancing the county’s biodiversity. It states that not including reference to enhancing biodiversity in the goals of the plan would constitute a failure to recognize the biodiversity emergency that was announced by the government in 2019 and would mean that local government in Kerry does not intend to address the biodiversity emergency and protect and advance the interests of Kerry people who depend on the biodiversity of the county for a living. Furthermore, it states that addressing the scourge of rhododendron in Killarney National Park also requires strong support from the council, such as can be achieved through enshrining biodiversity in the goals of this plan.</p> <p>The submission seeks removal of reference to investors in Goal Seven, to read as follows “Maintain and provide additional Services for our citizens and visitors”. The submissions rational for this is that it is not appropriate for the plan to include the providing of services for investors as one of only ten goals in the plan, they should not be of equal priority to the services to be provided to citizens. Equally, as Kerry has such a strong tourism sector, the services provided to visitors should be given a higher priority than investor services.</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”. Furthermore, the role of biodiversity is strongly acknowledged in the plan. Chapter 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 with applicable biodiversity actions. 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>In relation to invasive species national legislation pertaining to invasive species is specified in the provisions of the EC (Birds and Habitats) Regulations (SI 477 of 2011). The SI provides the legislative framework for the management of all invasive species as listed in Schedule 3. Rhododendron ponticum is just one of several invasive species listed. Therefore, is not deemed appropriate to restrict policy in the CDP to one species. It is recommended to maintain the terminology as used in the plan.</p>

	<p>The submission seeks the addition of the word ‘sustainable’ to Goal Four such that it becomes ‘Enhance Sustainable Physical and Digital connectivity internally, across the broader region and internationally. The submissions rational for this is that Goal two refers to a sustainable economy and it would be inconsistent to neglect to qualify the goal of enhancing physical connectivity with the word sustainable. It further states that the transport sector is a significant greenhouse gas emitter, and Kerry is very poorly served by sustainable transport options, including public transport and active travel infrastructure.</p>	<p>As regards the CDPs overarching policy on invasive species, this is outlined in Section 11.2.4 and further policy details are included in the Biodiversity Action Plan (see vol6). This included an action to raise awareness/education and to work with groups involved in the management of invasive species. It is considered that these policies and objectives (KCDP11-14 to KCDP 11-16) are adequate to stop/reduce the introduction/spread of the invasive species.</p> <p>Finally, it is noted the Killarney National Park is not under the ownership of KCC and its management is under the remit of NPWS. The council will however continue to support the NPWS and the CDP supports same, as outlined in the Killarney Town Development Plan, specifically Ob KA22.</p> <p>It is noted that Goal 7 seeks to strengthen the fabric of rural areas/villages and support the communities who live there. Goal 3 aims to attract inward investment and people into the county. This is in line with the overall vision of the plan to support the social, environmental and economic dimension of sustainable development.</p> <p>Amend Goal Four, Section 1.1 to read: 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>
<p>KE-C1-137 Liam Geary</p>	<p>The submission believes that KCC do an excellent job given the current budget.</p>	<p>Comment noted and welcomed</p>
<p>KE-C1-111 Mol Teic (t/a Dingle Hub)</p>	<p>Recommendation 1: It is recommended that greater emphasis should be placed on supporting the development of indigenous companies and local entrepreneurs and not just the emphasis on foreign direct investment, which is specifically named as a goal. The particular opportunities available through remote working and from networks of people working in and through local digital hubs, may also be worth mentioning.</p>	<p>Goal 3 (intro) referred to in the submission is a broad all encompassing goal that seeks to attract investment and people into the County. It does not specifically mention Foreign Direct Investment (FDI) or exclude other types of investment. Inward investment can consist of FDI and other types of investment in terms of supporting those entrepreneurs and businesses who wish to set up a business locally. A key aspect of this goal is the attraction of people into the County which is vital to long-term growth in the County. This is considered critical given the low population growth recorded for the County in the last Census. Investment could come in the form of people who wish to return home to Kerry or those who simply choose Kerry as their home and/or a place to do business. It is</p>

	<p>Recommendation 2: Support the growth of a ‘sustainable and strong economy’, it is recommended that the Council should commit to creating and supporting a county-wide ecosystem of innovation and a series of local ‘networks’ (of sectoral interests) at local community level, as these can assist in developing a sustainable pipeline of future companies, jobs and incomes.</p> <p>Recommendation 3: Recognising the high dependency of County Kerry on the Tourism and Hospitality sector, it is recommended that the County Development Plan should have a goal that seeks the development of a greater diversification of businesses and the job base across the county, spanning a range of different sectors and different levels of expertise and a parallel development of a supporting network of suitable Connected Hubs that can support these jobs across the county, while also supporting greater remote working in the rural areas.</p> <p>Recommendation 4: Electric Vehicles (EVs) - A suitable sustainable transport infrastructure should be prioritised as a matter of urgency and installed across the county (including a suitable public electric vehicle charging infrastructure and electric vehicle charging in tourist accommodation that can facilitate the simultaneous charging of multiple vehicles). This infrastructure should be capable of accommodating not only local commuters but also the significant number of tourists that visit the county each year.</p>	<p>not restricted to foreign investment. Therefore, it is not considered necessary to amend the wording of this goal. It should be noted that specific mention is given to Digital Hubs through the integration of the national policy set out in ‘Our Rural Future: Rural Development Policy 2021-2025’ into the overall Development Plan. Chapter 3 Core Strategy, Sections 3.2, 3.10, 3.10.2 and Chapter 9 Economic Development in particular section 9.7.4 places a strong emphasis on the contribution of remote working/digital hubs can make to the economy.</p> <p>KCC in its role as a Local Authority and Local Enterprise office already actively coordinates and supports (practical, advisory and financial supports) local groups such as business and various community groups. KCC through its Development Plan actively implements and supports national and regional policy on innovation and enterprise.</p> <p>KCC actively supports and encourages diversification in the local economy through its policies and objectives set out throughout the plan. For example, the Economic Recovery Plan which is referenced in the County Development Plan impacts across a range of topics including the regeneration of Kerry’s towns & villages, enhanced connectivity, education and training, marketing the county and also addresses the need to build resilience and diversification into the County’s economy to respond to the additional challenges and opportunities faced by businesses in Kerry. The content of the Economic Recovery Plan is detailed in Section 9.2.3.1.2 of the County Plan. Other national policy incorporated into this Development Plan of relevance to the need to achieve greater diversification in business and the different traditional sectors in the economy is set out under section 9.7.3 under ‘Our Rural Future Rural Development Policy 2021-2025’. It is particularly acknowledged throughout the County Development Plan that rural areas need to diversify to grow the rural population and economy.</p> <p>National policy requires the installation of E charging points in developments in accordance with the EU (Energy Performance of Buildings) Regulations 2021 for Electric Vehicle recharging infrastructure. The Development Plan has incorporated this requirement into the Development Management Chapter, Volume 6. In addition, the Council is currently preparing a Parking Strategy for the County. Key Challenges to be addressed in this strategy include promoting town centre regeneration</p>
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	<p>Recommendation 5: In relation to Goal 10 (<i>The development of Kerry as a Healthy and Age friendly County with Life-Long Learning opportunities</i>), it is recommended that ‘life-wide’ be added, in addition to ‘life-long’, particularly with the higher age profile, than the national average, for County Kerry.</p> <p>Recommendation 6: That a particular emphasis should be placed in the Development Plan on climate adaptation and, where possible, nature-based solutions should be the preferred options (for example, as is being done on the Maharees).</p>	<p>and a model shift in transport whilst meeting business needs, making town centres more accessible, meeting targets for electric vehicle charging points and improving parking infrastructure for key Tourism sites/routes. The CDP actively supports e charging facilities through objectives set out in the CDP listed below: KCDP 10-27, KCDP14-4, KCDP 14-36, KCDP 14-37, KCDP 14-37.</p> <p>Amend Goal 10 to include ‘life-wide’ in addition to ‘life-long’.</p> <p>The parallel national dual strategies of mitigation of greenhouse gas emissions (GHG), and adaptation - to the impacts of climate change is a key priority of the climate agenda. A key challenge is to integrate (or mainstream) the climate agenda into all levels of national, regional and local decision-making including policies, plans and programmes and strategies. Nationally responses are now being led by Government through evolving climate policy with Local Government identified as a key leader in driving climate action. The Development Plan has therefore incorporated all national policy as required with respect to Climate change. Chapter 2 with specific reference to section 2.6.4 gives a summary of mitigation and adaptation measures incorporated into the Development Plan.</p>
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<p>Recommendations</p> <p>Amend Goal Four, Section 1.1 to read: 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> <p>Amend Goal 10: to include ‘life-wide’ in addition to ‘life-long’.</p>	
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	<p>Chapter 1 – Introduction - County Overview, Plan Review Process, Monitoring and Implementation, Sustainable Development Interpretation and Planning Policy Context.</p>	
	<p>Submission Summaries</p> <p>KE-C1-289 Brian HARDING</p> <p>The submission states that whilst the draft plan was well advertised this time, there are still many people unaware of what the County Development Plan is not to mind the consequences the impact of changes would have on their locality, so proper consultation and education is vital.</p>	<p>CE Response and Recommendations</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 and webinars.</p>

KE-C1-218 Aidan Linnane		
KE-C1-215 Shannon Rangers KE-C1-212 Ballylongford GAA Club KE-C1-363 NEWKD	The submission requests clarity regarding how the plan's objectives will be met, with appropriate identification regarding resources for same, as well as a timeframe linked with relevant policies and plans (i.e., Rural Policy, National Spatial strategy, etc.).	The County Development plan together with allied plans and strategies including the NPF, RSES, LAPs, LECP, Tourism Strategy, Covid 19 Economic Recovery Plan guide capital investment of allied state agencies and form the basis upon which local funding applications for a range of social and community-based infrastructure can be made.
KE-C1-137 Liam Geary	The submission states that an advisory panel of citizens should be set up to review any/all aspects of county development every year.	The CDP is considered and adopted by the elected members of Kerry County Council (advised by the membership of the SPC) who are elected by the citizens of the county. In accordance with section 15 the Planning and Development Act as amended the Chief Executive must within 2 years of the making of the plan report to the members on the progress achieved in securing the objectives of the CDP.
KE-C1-199 Dingle Business Chamber	The submission states that a review of the current plan should be carried out and published stating how the objectives and actions have been met and benchmarked. It further states that this should be carried out for all future development plans on an annual basis.	The CDP is a planning land use framework that operates under various national guidelines and legislative requirements to provide support and structure for the sustainable development of the county. The planning and development act requires a review process be undertaken of the county development plan two years after its inception this is undertaken by the local authority. The county development plan is review and a new plan is prepared on a 6-year cycle.
KE-C1-107 John O'Sullivan	The submission states that with the public being invited to comment on the county development plan, it would be expected that KCC would include all relevant background information.	A significant quantum of background research and analysis was undertaken in the preparation of the issues paper and the draft CDP.
KE-C1-173 Milltown Community and Chamber Alliance KE-C1-391 Cahersiveen Community and Business Alliance	The submission welcomes the reference (1.9.1.2) to the UN Sustainable Development Goals 2030 and requests that Chapter 14 is brought into line with the overarching sustainable development objectives. The submission notes that the KCC Climate Change Adaptation Strategy 2019-2024 (1.9.5.3) will come up for renewal during the lifetime of the forthcoming county development plan, and strongly recommends that it give greater local effect to the recently enacted climate change bill, particularly in respect of public transport provision and green and active travel.	Comments in relation to the UN Sustainable Development Goals and the KCC Climate Change Adaption Strategy 2019-2024 are noted. Chapter 14 has been drafted and informed by the National Investment Framework for Transport in Ireland which identifies the following 4 investment priorities. 1. Decarbonisation 2. Protection and Renewal 3. Mobility of People and Goods in Urban areas 4. Enhancing Regional and Rural Connectivity

<p>KE-C1-171 Asdee Community Development Association</p>		<p>The preferential modal hierarchy in the plan is 1. Active Travel 2. Public Transport 3. Private Vehicles.</p>
<p>KE-C1-52 Catherine White</p> <p>KE-C1-70 Catherine White</p>	<p>This submission calls for more a more inclusive consultation process and outlined a number of suggestions which could be addressed: Add mobile text numbers and email address as a mode of communication. At a local and national level, underpinning documents for all the KCC Draft Chapters is to consider more fully the following: The National Disability Authority publications, Universal Design, Built Environment, Products and Services, Technology / ICT, Code of Practice on Accessibility of Public Services and Information provided by Public Bodies, Building for Everyone Dún Laoghaire-Rathdown County Council specifically reference the NDA document in their current development plan in the statement on their Community Strategy. Irish Sign Language Act; UNCRPD - United Nations Convention on the Rights of Persons with Disabilities (CRPD) - in particular sign language and the Deaf Community with its unique culture; Building for Everyone: A Universal Design Approach; Accessible online meetings; Participation in online meetings has become increasingly important since the start to the COVID-19 pandemic. NDA has published guidance on organising and running accessible online meetings (PDF). European Union (Accessibility of Websites and Mobile Applications of Public Sector Bodies Regulations 2020; Transport Publications; United Nations Urban Development; United Nations Human Rights Committee on the Rights of Persons with Disabilities as ratified by the State; Guidance for Public Bodies on Providing Access for Deaf Irish Sign Language Users; Irish Human Rights and Equality Commission Act 2014 - Public Sector Duty</p>	<p>It is a core aim of the KCC Corporate Plan 2019-2024, and reinforced by the policies and objectives of the draft plan to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies and plans.</p>
<p>Recommendations No proposed amendments</p>		

Chapter 2 – Climate Change & Achieving a Sustainable Future

Chapter 2 – Climate Change & Achieving a Sustainable Future - Climate Change and Planning and Local Context		
	Submission Summaries	CE Response and Recommendations
<p>KE-C1-71 MJ Kearney</p> <p>KE-C1-195 Caroline Hurley</p>	<p>The submission states that the Climate Action Plan must curb the primacy of economic growth, to keep future generations in mind.</p>	<p><i>Chapter 2 Climate Change and Achieving a Sustainable Future</i> outlines climate policy to be pursued by KCC over the lifetime of the plan to ensure future generations can mitigate and adapt to climate change. This includes the requirement for the LA to comply with the National Climate Action Plan 2021 (NCAP) as published on the 4th of November 2021 and for the LA to adopt its own Climate Action Plan (KCAP) which is to address mitigation and adaptation and co-ordinate climate action in the county.</p>
<p>KE-C1-302 Thomas Morelli</p>	<p>This submission states that the plan should not allow any new fossil fuel infrastructure. It further states that if Shannon LNG gets built, it would import fracked gas, which would be much worse fossil fuel than coal because it releases more greenhouse gases and hence would worsen the climate crisis. It states that there are employment opportunities and potential in North Kerry without the LNG.</p>	<p><i>Chapter 2 Climate Change and Achieving a Sustainable Future</i> outlines climate policy to be pursued by KCC over the lifetime of the plan to ensure future generations can mitigate and adapt to climate change. This includes the requirement for the LA to comply with the National Climate Action Plan 2021 (NCAP) as published on the 4th of November 2021 and for the LA to adopt its own Climate Action Plan (KCAP) which is to address mitigation and adaptation and co-ordinate climate action in the county. Furthermore, Chapter 12 outlines the Energy policy to be pursued by KCC which is in line with Regional, National and European policy particularly in relation to the recognition that energy systems need to transition to decarbonisation. The Council therefore 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, including 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> <p>Comments in relation to employment opportunities in North Kerry are noted. The CDP supports all forms of sustainable economic development as outlined in Chapter 9.</p>
<p>KE-C1-482 Transition Kerry</p>	<p>Change the title of Chapter 2 to Climate, Biodiversity & Achieving a Sustainable Future, Fill the role of a full-time Climate Officer, develop connections between existing urban biodiversity & climate resilient hotspots (Tralee Bay Wetlands and community allotments and gardens).</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 CAP. In addition, the CDP has been subject to a SEA and AA under both the SEA and Habitats Directive to</p>

<p>Consider the embedded energy in all technologies and prioritise technologies that create circular economies and create resilience in the County's energy systems. Give priority to small networks of community owned energy co-operatives to embed local energy resilience.</p> <p>SUGGESTED Changes to the wording of objectives. Suggested changes are in capitals.</p> <p>KCDP 2-4 Support measures to build resilience to climate change throughout the county to address impact reduction, adaptive capacity, awareness raising, GIVING PRIORITY TO INTEGRATED NATURE-BASED SOLUTIONS, BIODIVERSITY and emergency planning.</p> <p>KCDP 2-5 Support the development of sustainable communities that enhance the health and wellbeing of our people and places GIVING PRIORITY TO LOCAL BIODIVERSITY AND INTEGRATED NATURE-BASED SOLUTIONS.</p> <p>KCDP 2-6 Promote and support LOCAL BASED enterprises that create and employ the use of APPROPRIATE green technologies GIVING PRIORITY TO LOCAL BIODIVERSITY AND INTEGRATED NATURE-BASED SOLUTIONS.</p> <p>KCDP 2-7 Support 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>KCDP 2-9 Promote the development of a more sustainable agri-sector, having regard to the measures and environmental objectives of the forthcoming 'Common Agricultural Policy Strategy for Ireland, Ag Climatise 2020 – the National Climate & Air roadmap for the agriculture sector'.</p> <p>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>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>The comments in relation to various officers to be promoted within the LA are noted. However, the CDP is a land use plan and staffing within the LA is outside its scope. However, the CDP does support collaboration between the LA and a wide range of stakeholders including any future officers the LA may employ in the roles of Climate Action, Environmental Awareness and/or Biodiversity.</p> <p>KCDP 2-4 & 2-5 recommendations are noted, and it is suggested to amend the objectives accordingly as outlined below.</p> <p>KCDP 2-6 the CDP seeks to support all enterprise and the inclusion of words such as “local based”, “appropriate” and seeking to limit social enterprises to specific areas such as “biodiversity/nature-based solutions” is not considered necessary. Ultimately any proposal that requires permission under the CDP will have to be assessed and permitted further to proper planning and sustainable development in line with the policies outlined in the CDP. As regards comments on circular economy and embedded carbon etc, there are policies/objectives in the plan that support same including those within Chapters 12 and Chapter 13. It is not deemed necessary to repeat the objectives within Chapter 2.</p> <p>KCDP 2-7, comments are noted and it's recommended to amend the objective accordingly as outlined below.</p> <p>KCDP 2-9 the objective already supports sustainable agriculture practices in line with evolving National Policy. The addition of new objective is deemed appropriate to support existing policy.</p>
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<p>KCDP 2-10 Support INTEGRATED NATURE-BASED SOLUTIONS AND BIODIVERSITY to climate change challenges and also initiatives aimed at increasing soil carbon retention, sequestration, and storage.</p> <p>KCDP 2-11 Improve the efficiency and sustainability of LOCAL transport NETWORKS including improved and expanded public transport capacity and walking and cycling infrastructure, improved traffic management and bus priority ALWAYS GIVING PRIORITY TO GREEN INFRASTRUCTURE AND LOCAL BIODIVERSITY.</p> <p>KCDP 2-13 Give priority to small networks of community owned energy co-operatives to embed local energy resilience.</p> <p>Take into consideration and highlight the embedded energy in all technologies used as part of overall energy costs involved.</p>	<p>Amend objective KCDP 2-10 to Support nature based solutions.</p> <p>KCDP 2-11. The CDP seeks to support all transport networks and the inclusion of words such as “local”, is not considered necessary.</p> <p>KCDP 2-13. Chapter 12 outlines energy policy which includes strong support for community-based energy production. Ultimately any energy proposals that require permission under the CDP will have to be assessed and permitted further to proper planning and sustainable development in line with the policies outlined in the CDP.</p> <p>As regards embedded carbon, the plan supports the circular economy as outlined in Chapter 13 which includes the need to consider embedded carbon in future land uses/developments while Appendix 1, Volume 6 supports the need for lifecycle assessments. It is considered that the CDP already satisfactorily provides for and supports the suggested recommendations to this objective.</p> <p>Proposed amendments: Amend objectives KCDP 2-4, 2-5, 2-7 and 2-10 as follows: KCDP 2-4 Support measures to build resilience to climate change throughout the county to address impact reduction, adaptive capacity, awareness raising, <i>emergency planning</i>, <i>providing for giving priority, where feasible, to integrated</i> nature-based solutions and <i>emergency planning biodiversity</i>.</p> <p>KCDP 2-5 Support the development of sustainable communities that enhance the health and wellbeing of our people and places <i>giving priority to local biodiversity and integrated nature-based solutions</i>.</p> <p>KCDP 2-7 Support social enterprises and the circular economy within local communities to benefit <i>biodiversity/nature</i>, environmental protection, employment generation and <i>community wellbeing and</i> community development <i>using a whole systems approach</i>.</p>
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		<p>KCDP 2-10 Support INTEGRATED NATURE-BASED SOLUTIONS AND BIODIVERSITY to climate change challenges and also initiatives aimed at increasing soil carbon retention, sequestration, and storage.</p> <p>Add the following 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>KE-C1-416 Linda and John Edwards and Grady</p>	<p>This submission calls for peatlands and bogs in Kerry to be used by large corporations to sequester their carbon and local communities could be compensated. This idea could be used to fund local ecological projects etc.</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 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>KE-C1-182 Steve Edwards</p>	<p>The submission supports the Plan recognising the importance of biodiversity and nature conservation and further seeks to enhance biodiversity in the county.</p> <p>The submission welcomes Objective KCDP 2-6 which aims to support enterprise to create and employ the use of green technologies, providing such enterprises are not involved in releasing sequestered carbon dioxide and appropriately sited.</p> <p>It commends the intention to facilitate offshore wind energy proposals (sect 2.6.2.2). The submission further states given Kerry's large contribution of wind energy it should look at alternate green technologies or indeed to permit offshore windfarms only.</p> <p>The submission states that 360 million euro is committed for cycling and pedestrian projects as per the Programme for Government and invites the Local Authority to apply for funding to extend the Greenway to North Kerry with walkways, signage, and interpretive centres in prime areas such as the wetlands of North Kerry (Balligare bog, Rattoo round tower, the Old Court Lixnaw and Monks Road).</p>	<p>It is noted that the submission agrees in principle with existing policy in the CDP relating to renewable energy in particular the potential off-shore wind capacity for the county.</p> <p>Comments in relation to the potential for further greenways and/or similar projects in North Kerry are noted. This is specifically addressed in the existing Chapter 10 & 14 of the CDP. In addition, the county's associated <i>County Kerry Tourism Strategy</i> also acknowledges the potential of North Kerry 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>KCC 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 routes only and those identified are not an exhaustive list of planned greenways.</p>
<p>KE-C1-133 Linda Edwards</p>	<p>The submission states that Kerry should be promoted as an ecologically protected area for everybody to enjoy and to capitalise on the increasing number of people who wish to visit unspoilt areas. With the Greenways, Blue Flag beaches and the Wild Atlantic Way Kerry should be leading the way in encouraging walkers, cyclists, birdwatchers and</p>	<p>One of the aims of the Draft Plan is to support sustainable tourism within the County [Objectives KCDP 10-1 to KCDP 10-4]. Section 10.3.4.2 relates to Tourism and Wayfinding with an objective for signage provision [KCDP 10-23 & 10-24]. Section 10.3.4.1 outlines the importance of Accessible</p>

	<p>anglers. The provision of good signage to places of interest, car parks, wheelchair access and information boards should be of prime importance as well as the development of an app. There should be accommodation suitable for everyone including options such as glamping, caravans and camping. Kerry's historical and archaeological buildings and sites should also be promoted. Kerry needs to advertise and encourage visitors to all parts of the County which will have the added benefit of easing congestion in Killarney and the Ring of Kerry in the peak months.</p>	<p>Tourism with Objective KCDP 10-22 recognising the importance of universal accessibility to tourist services, facilities, and tourist sites. Chapter 14 of the plan sets out the importance of digital connectivity for the economic development of the county. The Draft Plan [Section 10.3.5] recognises that there is now a market for a variety of tourist accommodation types and this is supported by Objectives KCDP 10-26 to 10-32. Section 10.4.3 sets out the vision for Kerry's Culture and Heritage Tourism, as well as Objectives KCDP 10-58 to 10-62.</p>
<p>KE-C1-173 Milltown Community and Chamber Alliance</p>	<p>The submission would like to see the mitigation of the climate crisis reflected more strongly in subsequent chapters of the plan, especially Chapter 14.</p>	<p><i>Chapter 2 Climate Change and Achieving a Sustainable Future</i> outlines climate policy to be pursued by KCC over the lifetime of the plan. This includes the requirement for the LA to comply with the <i>National Climate Action Plan 2021</i> (NCAP) as published on the 4th of November 2021 and for the LA to adopt its own Climate Action Plan (KCAP). The latter is statutorily required to address mitigation and adaptation. It is considered that the CDP therefore strongly supports National and Regional climate policy and seeks to support the role of the LA to lead the county's response to Climate Action.</p> <p>In relation to comments on roads versus public transport, the CDP acknowledges the balance to be achieved in connecting the county with road infrastructure while also acknowledging the need to pursue active travel/public transport initiatives. The plan also acknowledges that the carbon footprint of road infrastructure can be mitigated by e.g., green procurement, lifecycle assessments while ultimately road users will adopt electric transport options as the transport network become decarbonised with time. The plan ultimately seeks via consolidating growth in our towns and other settlements to reduce the need for daily trips and support the modal shift required to support climate action. It is considered that this balance is satisfactorily achieved in the CDP.</p> <p>Chapter 14 has been drafted and informed by the National Investment Framework for Transport in Ireland which identifies the following 4 investment priorities.</p> <ol style="list-style-type: none"> 1.Decarbonisation 2.Protection and Renewal 3.Mobility of People and Goods in Urban areas 4.Enhancing Regional and Rural Connectivity

		The preferential modal hierarchy in the plan is 1. Active Travel 2. Public Transport 3. Private Vehicles.
KE-C1-199 Dingle Business Chamber	The submission seeks that the Local Authority does a carbon audit similar to the census so that it is done for every business and household, with tiered incentives to meet certain carbon targets. It further states that any carbon tax collected is paid out as a carbon dividend to assist people and businesses to lower their carbon emissions.	<p><i>Chapter 2 Climate Change and Achieving a Sustainable Future</i> outlines climate policy to be pursued by KCC over the lifetime of the plan. This includes the requirement for the LA to comply with the <i>National Climate Action Plan 2021</i> (NCAP) as published on the 4th of November 2021 and for the LA to adopt its own Climate Action Plan (KCAP). The latter is statutorily required to address mitigation and adaptation. It is envisaged the KCAP, overseen by the LAs climate action team, will actively lead all sectors of society in the county to strive to meet emissions targets as part of the overall sectoral targets outlined in the NCAP. It is acknowledged that Dingle will play a pivotal role acting as a pilot e.g., as the county's first decarbonisation zone. These initiatives already supported in the plan, will build on the existing framework and collaborations in place under the Dingle Peninsula 2030 initiative. Energy planning requiring an assessment of existing energy demands; uses and the incentivising of changes in energy use are all envisaged as part of these climate action responses. How carbon budgets/carbon tax will ultimately be achieved and allocated in the county is outside the remit of the CDP. However, the CDP supports a just transition for all stakeholders, as we move towards a carbon neutral society and will support any measures that seek to aid in this transition.</p> <p>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.</p>
KE-C1-165 Kate Carmody	The submission acknowledged that Climate Change now plays a role in the CDP. The submission also had comments to make regarding the enforcement of planning conditions and flood risk.	The Comments in relation to KCC's position on/recognition of climate change are noted. KCC has an active planning enforcement unit to ensure compliance with planning conditions.
KE-C1-116 Johnnoel McCarthy	The submitter comments that the alternative use of agricultural land for pod park type accommodations for the provision of tourist accommodation in Portmagee.	Chapter 10 of the CDP supports rural development and provides adequate objectives to facilitate farm diversification and new employment / enterprise opportunities within the agriculture sector and which are deemed subsidiary to agricultural uses. Specific policy relating to glamping/pod style accommodation is outlined in Section 10.3.5.1.

<p>KE-C1-127 Farranfore Development Association</p>	<p>The submission had the following suggestions and comments to make; Encourage and facilitate improved linkages between various modes of transport including connection between arrival/departure points and joined up scheduling information.</p> <p>Farranfore was originally developed as a transport hub and has continued to fulfil this role. The village provides national and regional air, rail and road transport. Visitors arriving in Farranfore by bus, rail or air need to be better catered if Farranfore is to continue to grow based on its status as a transport hub, Kerry Airport is located over 1km east of the town core and there is a need to ensure individuals and groups arriving in the airport can avail of services in the village core and link up with bus and rail services.</p> <p>The potential for development of an integrated public transport terminal, which would see the bus stops moved from the N22 to the area within the Train Station, should be explored and include mitigation measures to allow for safe access/exit for buses to/from the train station. This allows for covered bus shelters and real time passenger information for transport users and visitors arriving by Train, Bus and Air.</p>	<p>The strategic importance of Kerry Airport is acknowledged in the CDP specifically within Chapter 14. Objectives in this chapter seek e.g., to support the develop of a multi-modal transport system to and from the airport. In addition, objectives in this chapter seek 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.</p>
<p>KE-C1-173 Milltown Community and Chamber Alliance</p>	<p>The submission states that attainment of targets in respect of biodiversity (2.5.1) requires the preservation of valuable landscapes, not least the Kilcoleman Demesne, the wetlands and woodlands in the vicinity of Milltown. Their preservation is integral to ensuring that the policy objectives presented in Chapter 10 have any application in Milltown.</p>	<p>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>

Recommendations

KCDP 2-4 Support measures to build resilience to climate change throughout the county to address impact reduction, adaptive capacity, awareness raising, *emergency planning*, providing for *giving priority, where feasible, to integrated* nature-based solutions and *emergency planning biodiversity*.

KCDP 2-5 Support the development of sustainable communities that enhance the health and wellbeing of our people and places *giving priority to local biodiversity and integrated nature-based solutions*.

KCDP 2-7 Support 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*.

KCDP 2-10 Support *integrated nature-based solutions and biodiversity* to climate change challenges and also initiatives aimed at increasing soil carbon retention, sequestration, and storage.

Add the following 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.

Chapter 2 – Climate Change & Achieving a Sustainable Future - Kerry County Development Plan 2022-2028 - Climate Action		
	Submission Summaries	CE Response and Recommendations
<p>KE-C1-88 mary mahony KE-C1-245 Maura Healy-Rae KE-C1-195 Caroline Hurley</p> <p>KE-C1-199 Dingle Business Chamber</p>	<p>This submission states that Electric Vehicle charging points should be installed in Dingle /Daingean Ui Chúis and in the main villages on the Dingle Peninsula.</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>KE-C1-297 Dingle Peninsula Tourism Alliance</p>	<p>The submission seeks amendments to Objective KCDP 2–5 calling for the Social Pillar of Sustainable Tourism to be integrated into this plan.</p> <p>In relation to Objective KCDP 2–7 the submission recommends that the plan adds an action that can represent or lobby on behalf of the county, the restrictive impacts imposed on progress by insurance industry.</p> <p>Regarding Objective KCDP 2–12, the submission requests the urgent addition of more public quick charging points across the peninsula / county in advance of Season 2022 to support the ease of traffic and visitor management.</p>	<p>The concept of sustainable tourism forms a core component of community, economic and tourism policy and allied objectives throughout the plan.</p> <p>As regards the cost of the insurance, its noted that insurance cost and/or lobbying in relation to same are outside the remit of the CDP.</p> <p>For response to EV charge points see KE-C1-88 above.</p>
<p>KE-C1-247 Maura Healy-Rae</p>	<p>The submission states that it should be an objective of this council, to protect our water quality and to protect against flooding, that there is systematic dredging of the rivers in this county.</p>	<p>Policy and objectives in relation to the protection of water quality are specifically detailed in Chapter 13 of the CDP. There is an overarching requirement for the LA to ensure compliance with the Water Framework Directive now into its third cycle. Any works proposed to, at or within a waterbody would require an environmental assessment under the EIA, Habitats and Water Framework Directive. Again, policy and objectives relating to any proposed works to, at or within a waterbody are outlined in the aforementioned Chapter 13 with development management procedures outlined in Volume 6, Appendix 1.</p> <p>In relation to comments on flooding, see response to KE-C1-165 above.</p>
<p>KE-C1-244 Maura Healy-Rae</p>	<p>The submission states that the wording of Objective KCDP 2-12 should be amended to “Support investment in the sustainable development of Electric Vehicle charging facilities in all towns and villages”.</p>	<p>See response to KE-C1-88 above.</p>

KE-C1-190 John O’Grady	The submission states that peatlands should be protected and not developed on for carbon offsets, combat climate change and help biodiversity.	See response to KE-C1-416 above.
KE-C1-306 Danny Healy-Rae	The submission states that this objective should be expanded to include that all new developments must provide an Electric Vehicle charging point infrastructure.	See response to KE-C1-88 above.
KE-C1-385 Cllr Jackie Healy-Rae	The submission states that it should include that Kerry County Council will increase the number of EV Charging Points in their own car parks and publicly owned lands, but that it will also do so through own resources and not solely reliant private investment.	See response to KE-C1-88 above.
KE-C1-397 North Kerry Environmental Forum /Association	This submission outlines that a strong policy is required relating to ICZM particularly for coastal areas which suffer from coastal flooding, loss of habitats and biodiversity, which must be addressed via a long-term perspective [ICZM].	Policies and objectives in relation to Coastal Zone Management are set out in Chapter 11 – Environment and seek to protect habitats, enhance biodiversity and to ensure that vulnerable developments are not permitted in areas identified at risk of flooding.
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional objective which states “Promote awareness of the value of restored peatlands in storing carbon and mitigating climate change and promote and support efforts to both prevent further degradation of peatlands and to restore already-degraded peatlands.” The submissions rationale for this is that peatlands are the world’s largest natural terrestrial carbon store and there is a general lack of awareness of the value of wet peatlands in mitigating climate change and it is also critical that Kerry County Council is seen to be leading the way in supporting projects aimed at restoring the carbon storage value of peatlands. The submission further states that the plan only contains twenty-one instances of the word ‘peat’ and one instances to the word ‘bog’, and none of these instances relates to the promotion of the importance of undrained peatlands for biodiversity and carbon storage and references to protecting and enhancing peatlands should also be included in other chapters, for example Chapter 11.	<p>Comments in relation to peatlands is noted. See response to KE-C1-416 above. In addition, further to the submission, it is considered appropriate to include a new objective as suggested.</p> <p>Proposed Amendment: Include the following new objective in Chapter 2.</p> <p>KCDP 2- “Promote awareness of the value of restored peatlands in storing carbon and mitigating climate change and promote and support efforts to both prevent further degradation of peatlands and to restore already-degraded peatlands.”</p>
KE-C1-214 Not Here Not Anywhere	<p>The submission states that for climate policy on a local and national level to be effective, it has to be based on public participation and take into account the needs and voices of communities. It seeks the following:</p> <p>Outside the development of this plan, the council should lead annual local climate dialogues which serve to inform communities about the ongoing transition to a low carbon society and seek their opinions, ideas and consent.</p> <p>The Climate Action and Environment office, or equivalent, within the council must be adequately resourced, publicised and staffed. These offices should work closely with local communities to improve education and access to information around environmental issues, proactively engage in consultations and participatory processes which allow local people to have a say in the energy transition in their area.</p> <p>Wherever practically possible, participatory processes should be designed in a participatory way, with input from representatives of all groups who are expected to take part.</p>	See response to submissions KE-C1-71, KE-C1-173 & KE-C1-199 above.

	<p>Special outreach efforts must be made to include disadvantaged or marginalised groups in participatory processes. Those running participatory processes should keep a detailed record of the participation of marginalised groups and of best practices that serve to increase this participation.</p> <p>Support and establish community energy projects throughout the lifetime of the county development plan.</p>	
<p>KE-C1-173 Milltown Community and Chamber Alliance</p>	<p>The submission welcomes the commitment (2.6.1) that “expansion of settlements will generally be from the centre out and supported by an appropriate level of infrastructure and services”. Had this approach being pursued over the course of previous plans, Milltown would have avoided the growth pattern that emerged since the early 2000s. While it is not possible to undue that damage, steps can be taken to mitigate it, most notably the development of the parkland demesne – adjacent and linked to Milltown’s centre i.e. The Square.</p>	<p>The submission’s support for the settlement pattern proposed for Milltown as a regional town in the CDP’s proposed settlement hierarchy is noted.</p> <p>The land-use policy framework for Milltown as part of the Corca Dhuibhne EA LAP 2021-2027. Land-use zonings contained in this strategy are sequential to the core of the village and are contiguous to the existing built-up area. In addition, the council has secured funding to develop a master plan which will involve community consultation and engagement which will lead to further opportunities for funding to address identified issues and challenges.</p>
<p>KE-C1-111 Mol Teic (t/a Dingle Hub)</p>	<p>The submission makes a number of comments and 5 key recommendations on climate action.</p> <p>Recommendation 7 (in the submission) notes references to the National Climate Action Plan should be amended to 2021.</p> <p>Recommendation 8 & 9 relates to the promotion of active travel and high-quality public transport service connecting the three Knowledge Triangle towns including Milltown, thereby facilitating the commuters in these towns to affect a modal shift by initially not requiring second cars in their households.</p> <p>Recommendation 10 relates to support for facilitating technologies, such as anaerobic digestion, that support the circular economy and help reduce emissions from agriculture, while also providing biofuels.</p>	<p>The overall support for Climate Action policy outlined in Chapter 2 by the submission is noted.</p> <p>In relation to recommendation 7 - the Climate Action Plan 2021 was published on the 4th of November 2021, when the drafting of the County Plan had been completed. Therefore, the draft CDP will now be updated to take into account the recently published Climate Action Plan 2021. All reference to the NCAP 2019 in the plan will be amended to 2021.</p> <p>In relation to recommendation 8 & 9 Chapter 14 outlines the CDP policy in relation to connectivity in the county. It includes objectives that support integrating land use planning with transport in line with National and Regional Policy. As such the plan strongly supports the modal shift required for the county to achieve its emissions targets in relation to transport. Facilitating high quality public transport and active travel across the county is supported in existing policy.</p> <p>In relation to recommendation 10, there are several objectives in the CDP that support alternative technologies with Anaerobic Digestion specifically mentioned in Chapter 12 and 13. In addition the CDP broadly supports agricultural climate action measures specifically those actioned in the Department of Agriculture, Food, and the Marine’s Ag Climatise, 2020.</p>

<p>Finally, recommendation 11 recommends a number of changes to existing objectives in the plan: namely:</p> <p>KCDP 2-3: For clarity, refer to the ‘Dingle Peninsula Decarbonisation Zone’ (as opposed to simply ‘Dingle Decarbonisation Zone’) and consider the opportunity to look at the contiguous area of Castlemaine/Milltown as an initial possible expansion area.</p> <p>KCDP 2-7: it is considered appropriate to add ‘increased income streams’ after ‘employment generation’ as, in many cases, people will draw on multiple income streams to provide sustainable revenue, as opposed to having a single job. This is particularly important for farmers and those running tourist accommodation, who may wish to supplement their main income stream.</p> <p>KCDP 2.9: Consider the role that information and communication technologies (including Internet of Things) can play in addressing the objective of ‘promoting the development of a more sustainable agri-sector’. (The Dingle Hub has experience of this through an EU Project called ‘Ploutos’)</p> <p>KCDP 2.10: In relation to ‘support nature-based solutions to climate change challenges’, it may be beneficial to propose the nature-based solution as the preference, unless it is not feasible (technically or economically). This is particularly relevant to addressing coastal erosion (as seen in the Maharees).</p> <p>KCDP 2.11: Amend the wording to read ‘Improve the efficiency, sustainability and the integration of sustainable transport and mobility, with a preference for active travel and including improved and expanded public transport capacity, networks and infrastructure, attractive fares, encouraging vehicle sharing (where appropriate), integrated walking and cycling infrastructure, improved traffic management and bus priority.’</p> <p>KCDP 2.12: There is a commitment in the plan to electrifying transport, this will result in electric vehicles becoming the norm in time. Therefore, it is critical that the county has</p>	<p>In relation to recommendation 11:</p> <p>KCDP 2-3: At present the LA intends to pilot measures within Dingle town, however the expansion of any measures if successful would be envisaged to be rolled out to other areas at a later date. This will be in consultation with relevant stakeholders. Amend to read the ‘Dingle Peninsula Decarbonisation Zone’ (as opposed to simply ‘Dingle Decarbonisation Zone’).</p> <p>KCDP 2-7 Recommendation is noted. This objective will be amended as outlined below.</p> <p>KCDP 2-9. The CDP strongly supports all innovations in IT including those in the agri-sector. However, it is not considered necessary for the plan to individually name all such initiatives.</p> <p>KCDP 2-10: In order to promote environmental sustainability and climate action as integral elements of development projects, there is increasing recognition of the potential for use of a nature-based approach, as an integral part of the design of all future projects. This nature-based approach brings multiple benefits, in addition to dealing with environmental pollution. These include climate adaptation, better place-making and wellbeing, & increased biodiversity. Objective KCDP 11-4 in the Draft Development Plan clearly sets out the Council’s intention to promote nature-based solutions.</p> <p>KCDP 2-11: The comments are noted and the objective will be amended as suggested, as outlined below.</p> <p>KCDP 2-12: Comments in relation to EV infrastructure is noted, please see response to KE-C1-88 above.</p>
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	<p>appropriate infrastructure (and services) in place, in a timely manner, to facilitate charging in different areas (home/work/ retail etc), and that the necessary electricity infrastructure is available to allow for simultaneous charging of multiple electric vehicles at these locations, in a manner that caters for the local commuters and the significant number of tourists. The infrastructure required for this is quite significant and, if it is not available in a timely manner, it may negatively impact on tourists visiting the county.</p>	<p>Proposed Amendment: Replace reference to the Climate Action Plan 2019 with Climate Action Plan 2021, in Chapter 2, sections 2.3.2, 2.3.3 & 2.3.6 and in objective KCDP 2-2.</p> <p>Amend Objective KCDP 2-3 to read the 'Dingle Peninsula Decarbonisation Zone' (as opposed to simply 'Dingle Decarbonisation Zone').</p> <p>Amend Objective KCDP 2-7 as follows: Support social enterprises and the circular economy within local communities to benefit biodiversity/nature, environmental protection, employment generation increased income streams' and community wellbeing and community development using a whole systems approach.</p> <p>Amend Objective KCDP 2-11 as follows: Improve the efficiency and sustainability and the integration of sustainable transport and mobility, with a preference for active travel and of transport including improved and expanded public transport capacity, networks and infrastructure, attractive fares, encouraging vehicle sharing (where appropriate), integrated and walking and cycling infrastructure and improved traffic management and bus priority.</p>
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<p>Recommendations</p>	
<p>Insert New Objective - KCDP 2- "Promote awareness of the value of restored peatlands in storing carbon and mitigating climate change and promote and support efforts to both prevent further degradation of peatlands and to restore already-degraded peatlands."</p>	
<p>Amend Objective KCDP 2-3 to read the 'Dingle Peninsula Decarbonisation Zone' (as opposed to simply 'Dingle Decarbonisation Zone').</p>	
<p>Amend Objective KCDP 2-7 as follows: Support social enterprises and the circular economy within local communities to benefit biodiversity/nature, environmental protection, employment generation increased income streams' and community wellbeing and community development using a whole systems approach.</p>	
<p>Amend Objective KCDP 2-11 as follows: Improve the efficiency and sustainability and the integration of sustainable transport and mobility, with a preference for active travel and of transport including improved and expanded public transport capacity, networks and infrastructure, attractive fares, encouraging vehicle sharing (where appropriate), integrated and walking and cycling infrastructure and improved traffic management and bus priority.</p>	

Chapter 3 – Core & Settlement Strategy

Chapter 3 – Core & Settlement Strategy - Introduction, Core Strategy Map, Future Population Growth, Sustainable Countywide Development and Populations Projections & Spatial Distribution		
	Submission Summaries	CE Response and Recommendation
KE-C1-375 Southern Region Waste Management Office	This submission suggests that the Circular Economy should also form part of the Core Strategy.	<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. While objectives KCDP 2-7 & 2-8 support the circular and bio economy it is considered acceptable to include reference to the circular and bio economy as a main principle of the Core Strategy (Section 3.4).</p> <p>Add the following principle to Section 3.4;</p> <p>Circular Economy - To transition to a 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.</p>
KE-C1-380 MARTIN MULVIHILL	The submission requests that Moyvane is designated as a district town on the same basis as neighbouring Ballylongford and Tarbert.	<p>Settlements are designated in the settlement hierarchy as per Section 3.10.2 of the Draft Development Plan. Moyvane’s place in the hierarchy has therefore been determined based on the criteria set out in this section.</p> <p>It should also be noted that Moyvane’s wastewater treatment plant does not have spare capacity which would therefore limit the level of development that can take place until the situation is remedied.</p>
KE-C1-380 MARTIN MULVIHILL	The submission requests that the Moyvane and Knockanure areas to be included as ‘Other Rural Areas’ instead of ‘Rural Areas Under Urban Influence’ in order to make it easier to provide much needed housing in the area.	<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.</p> <p>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.</p> <p>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>

KE-C1-171 Asdee Community Development Association	The submission welcomes the designation of Asdee as a 'small village settlement' (map 3.3), as a step towards ensuring it rightfully attains village status and leveraging the opportunities this will bring, particularly new housing and population growth.	This submission is acknowledged.
KE-C1-371 Ruden Homes Ltd.	The submission states that an inadequate population target for Tralee has been set out in the Core Strategy and failure to provide sufficient zoned and land for the current inadequate target.	It is an objective under the RSES for the Key town of Tralee to grow by 30% by 2040. The population target for Tralee as set out in Chapter 3 for Tralee to 2028 is considered adequate to meet this target. In addition, sufficient land is zoned in Tralee (see Volume 2) to accommodate this anticipated growth.
KE-C1-381 North Kerry Football Board	The submission disagrees with the plan to increase the population inside the Kerry Hub & Knowledge Triangle, to the detriment of the rest of the county as this will result in more depopulation and loss of services in those areas out the hub.	The settlement hierarchy has categorised settlements in a balanced way around the county based on the criteria set out in section 3.10.2. This is illustrated on Map 3.3 of the Draft Plan where it is clearly shown that there is a network of settlements in the northern part of the county. It is envisaged that these settlements, along with the rural area, will grow over the lifetime of the plan, thereby ensuring balanced development in the county.
KE-C1-380 MARTIN MULVIHILL	This submission states that North Kerry, specifically Listowel and Moyvane, appear to be ignored in the draft plan. It states that the North Kerry region needs the opportunity for focused development otherwise the wider North Kerry area may suffer irreversible decline.	See response already above
KE-C1-382 The Kerry Food Hub	The submission states that the Firies area will require scope for additional housing development.	Firies is identified as District town in the settlement hierarchy, with a population allocation target of 46 equating to a housing target of 36. It is considered that the provision of residential zoned land as set out in the Killarney and Corca Dhuibhne LAPs is sufficient to cater for this demand.
KE-C1-391 Cahersiveen Community and Business Alliance KE-C1-385 Cllr Jackie Healy-Rae KE-C1-173 Milltown Community and	<p>The submission states that as currently drafted, the plan provides for 25% of the population growth to take place in the regional towns, while 43% would be allocated to Killarney and Tralee. Kerry should emulate the NPF and set a target of 50% of the growth going into the regional towns (second tier settlements). Of the regional towns, Cahersiveen has been given the lowest population growth allocation. This figure needs to be revised upwards to at least 200.</p> <p>The submission states that regional Towns will see a far greater influx of people coming to live there (due to remote working) and the plan should see more ambitious population growth figures as a result.</p> <p>The submission states that the projected housing allocation as presented in Table 3.7 is too high give the load Milltown has had to bear over the past two decades and its essential that services and amenities are upgraded before any new houses are built</p>	The NPF does not set a growth target of 50% population growth. The settlement hierarchy has categorized settlements and allocated population targets in a balanced manner in accordance with the criteria as set out under section 3.10.2. There are adequate lands zoned in Cahersiveen and other regional towns contained in the recently adopted LAPs.

Chamber Alliance		
KE-C1-107 John O'Sullivan	The submissions states that it is planned by KCC to increase Killarney's population by at least 40% or by 5,000 people by 2040. What knock on impact will this have on the demand for other services, jobs, housing, schools and the impact on the nature of the tourism offering in Killarney, this is not sustainable, proper planning.	This target to increase the population of Killarney by 40% in 2040 is in accordance with the NPF and the designation of Killarney as a Key Town in RSES. Growth in Killarney is therefore in accordance with proper planning as it follows the policies set out in the national and regional planning frameworks.
KE-C1-147 Tarbert Development Association	The decline of rural population is significant and can only be curtailed by having jobs accessible in areas outside of farming, forestry and fishing.	It is a core tenet of this plan to arrest rural population decline and to sustain and grow the rural economy. Chapter 3 and 9 contains a range of policies and objectives to sustain the rural population and to encourage additional sectoral activity in addition to the rural economy and the traditional sectors of farming, forestry and fishing.
KE-C1-434 Listowel Business & Community Alliance	The submission welcomes population allocation for the town of Listowel and would stress the balance needed between social and private housing developments and that a mix of housing types is required in order to meet and adapt to the changing demographic trends and household profiles in Listowel.	Chapter 4 to 7 require that housing developments consist of a mix of range, type and size to facilitate the housing needs of all sectors of society including the various household sizes. Objectives KCDP 6-15 to 6-19 support this.
KE-C1-165 Kate Carmody	The Draft County Development plan changed the language from settlement node to small village settlement. These villages are villages and should be classified as such. By not classifying them as villages you are denying them of any chance of being on the priority list for waste-water treatment.	Settlements have been classified in the Settlement Hierarchy as per Section 3.10.2 of the Development Plan. Each category of settlement have settlements at the upper and lower end of each category. To recategorise Small Village Settlements as villages would not be in accordance with the proper planning and sustainable development of these settlements. The growth of each settlement will be determined by its existing scale and infrastructure availability.
KE-C1-127 Farranfore Development Association	<p>Given the services available in Farranfore, the excellent infrastructure and proximity to the major population centres of Kerry, it is ideal location within the county for business/enterprise development and also residential development.</p> <p>As a transport hub with air and rail linkages, strategically located at the junction of the N22 and N23 in close proximity to the large settlements of Killarney and Tralee, Farranfore has huge potential to continue to develop as a business centre in the County.</p> <p>Encourage Farranfore's position as a transport hub by facilitating the development of transport related facilities within the town and safeguarding Kerry Airports operation and expansion.</p>	<p>Farranfore designated as a District town. it 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 to the 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.</p> <p>The Local Authority recognises the strategic importance of Kerry International Airport (KIA) and Shannon and Cork Airports as a key factor in promoting the economic development of the County. Chapter 14 Connectivity includes KCDP 14-20 which seeks to protect key infrastructure such as Kerry Airport, as well as seeking its further enhancement through objectives KCDP 48 to KCDP 52.</p>

	<p>Support & promote Kerry Airport as a location for further aviation related services and infrastructure development</p> <p>Enable long overdue residential development in Farranfore and promote best practice in encouraging development within easy access of the current services of the village.</p>	<p>There are lands zoned for residential and enterprise development in the Farranfore Local Area Plan which forms of the Killarney M.D. LAP 20182-2024.</p>
<p>KE-C1-127 Farranfore Development Association</p>	<p>Farranfore is ideally positioned and has the required services available to support sustainable and appropriate rural residential development. The upgrading in the capacity of the Farranfore wastewater treatment plant is fundamental to this.</p>	<p>It is noted that the Farranfore Wastewater Treatment Plant was not included in the Irish Water List. It has a capacity of 500P.E. and the loading is estimated at 400P.E. leaving a Headroom of 100P.E. there is a population allocation of 42 and this is considered sufficient given the size of the existing settlement.</p>
<p>KE-C1-69 Lyreacrompane Heritage Group</p>	<p>An increased population, whether by retaining more of the existing population or by encouraging new families to come and live here, is urgently needed. Support for rural housing, social housing, restoration of vernacular buildings and new plan to make Lyreacrompane a small village.</p>	<p>It is the policy of Kerry County Council to seek to strengthen and diversify rural towns and villages to be a focus for local housing. The Council will also facilitate and support Irish Water and other stakeholders to deliver investment in the sustainable development of water and wastewater and other infrastructure for towns and villages, to enable small villages to grow and sustain rural places. It is the policy of the Council to encourage people who wish to reside in the countryside to live in villages or small village settlements where services are available. As an alternative to one-off housing, it is an objective of this plan to permit clusters of housing served by <u>individual wastewater treatment systems</u> in the small villages and small village settlements (such as Lyreacrompane and those listed in Table 5.1) where there is no wastewater infrastructure or no plans for such infrastructure. The strategy for these clusters within these settlements is to facilitate a small number of additional dwellings and/or small enterprises to consolidate the existing pattern of development around these focal points and utilise existing services in the area.</p>
<p>Recommendations</p> <p>It is considered prudent to amend the Section 3.4 - Core Strategy to include and reflect the official policy requirements, summarised as;</p> <ul style="list-style-type: none"> - to maintain the strategic function, capacity and safety of the national roads network, and - 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>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>Add the following principle to Section 3.4;</p> <p>Circular Economy - To transition to a 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.</p>		

Chapter 3 – Core & Settlement Strategy - Settlement Strategy, The Zoning of Land for Residential Development and Core Strategy Statement		
	Submission Summaries	CE Response and Recommendation
KE-C1-82 Southern Regional Assembly (SRA)	<p>4: Allocation of Growth to Key Towns and Regional Towns</p> <p>The SRA supports the evidence-based, infrastructure led allocation of growth to settlements. In this regard, it is recommended that in the final determination of allocated population growth and housing targets under the Core Strategy, the growth of Key Towns, is reinforced and referenced through the Core Strategy. The distribution of growth across the tier of Regional Towns should also be tailored in accordance with the principles and sustainable criteria of NPF National Policy.</p>	<p>Section 3.10.3 Population Distribution outlines the rationale used to distribute population throughout the county. The population growth allocation for Tralee and Killarney is 4,371. This growth allocation will ensure that these Key Towns will grow by over 30% by 2040 (in accordance with the RSES) positioning these settlements as national and regional investment locations due to their competitiveness and attractiveness. The remaining population growth of 5,070 is allocated to other towns in the County and the rural area. This will ensure that development in these towns is commensurate with the scale of these towns and the provision of additional employment. The population growth figures for the towns have also been informed by the Housing Strategy/HDNA and the Council “Housing Delivery Action Plan. The population growth/housing targets for a number of the towns have been slightly adjusted to provide an adequate social mix in the development of private and social housing.</p> <p>Recommendations</p> <p>Amend Settlement Types Table 3.5</p> <p>Key Town; Large population scale urban centre functioning as self-sustaining regional drivers, and strategically located urban centres with accessibility and significant influence in a regional and sub-regional context.</p> <p>Regional Town; Towns which provide a housing, employment, or service function servicing a local region within the county. The category is broad and ranges from large commuter towns to more peripheral towns.</p>
KE-C1-21 Woodlands	<p>These submissions support the inclusion of Faha, Glenflesk and Headford as ‘small village settlements’ in the Draft Plan.</p>	<p>The settlements of Faha, Glenflesk and Headford are included as a Small Village Settlements in the settlement hierarchy. It is an objective of the</p>

<p>Equestrian Club and Showground KE-C1-251 Maura Healy-Rae KE-C1-250 Maura Healy-Rae KE-C1-308 Danny Healy-Rae KE-C1-252 Maura Healy-Rae KE-C1-308 Danny Healy-Rae</p>		<p>plan to support the sustainable growth and prioritise development of the county's settlements. It is the policy of the council to consolidate the existing pattern of development around these focal points and utilise existing services in the area.</p>
<p>KE-C1-312 Dromclough NS</p>	<p>The submission states that Listowel should be included as a key town in the plan and that supports and consideration should be directed towards the capital of North Kerry in the same way as they are towards Tralee and Killarney.</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.</p> <p>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>KE-C1-363 NEWKD</p>	<p>The submission requests the amendment of KCDP 3-7 to include "and regional plans as appropriate for some areas (e.g. Corca Dhuibhne peninsula and West Kerry Gaeltacht)".</p>	<p>Kerry County Council will prepare local area plans for the settlements as outlined in the Development Plan as per Objective KCDP 3-7. Local Area Plans as currently prepared include plans for West Iveragh and Corca Dhuibhne Electoral Area, which would form parts of municipal districts. How local area plans for the settlements are grouped will be determined upon their preparation. As local area plans are at a settlement level, other policies applicable to an area are contained in the County Development Plan. The overarching policies relevant to a peninsula or Gaeltacht are therefore contained in the Development Plan.</p>
<p>KE-C1-513 Mikey Sheehy</p>	<p>Support the sustainably development of Fenit village.</p>	<p>Fenit is included as a District Town in the Settlement Hierarchy. Its local area plan forms part of the Tralee M.D. Local Area Plan 2018-2024.</p>
<p>KE-C1-173 Milltown Community and</p>	<p>The submission welcomes the designation of Milltown as a 'regional town' (Table 3.6) and looks forward to the development of the associated service functions. We are concerned, however, at the description of some regional towns as commuter towns and</p>	<p>The description of regional towns is set out in Table 3.5 and defines these settlements as towns which provide, housing employment and a broad range of services This description is considered reasonable. Small village</p>

<p>Chamber Alliance</p>	<p>cautions against pigeon-holing any town. Instead, towns need to be seen as multi-functional. Table 3.5 needs to be revised in that light e.g., regional towns, such as Milltown provide housing, employment, service, educational, recreational AND other functions. Our neighbouring communities (Listry and Castlemaine) should not be described as rural hinterlands, but as part of the network of multi-functional spaces and nodes in Mid-Kerry. We travel to Castlemaine for some services, and they come here for others, but we do not see ourselves as being in the other’s hinterland.</p> <p>The submission also seeks the inclusion of Listry as a small village settlement, similar to the inclusion of Faha.</p>	<p>settlements have been identified and designated having regard to the local services contained therein and the geographical area which avails of these services.</p>
<p>KE-C1-103 CIF</p>	<p>The submission relates to the development of Brown Field Sites</p> <ul style="list-style-type: none"> -Releasing the development potential of Brownfield sites is extremely challenging as many are in multiple ownership, often contaminated, require demolition works, involve complex construction management, can be poorly serviced and are often located in areas which require significant regeneration. A viability assessment of all key Brownfield and Infill sites should be considered. <p>Housing Density</p> <ul style="list-style-type: none"> -The submission welcomes as mentioned in the plan “lower residential density figure may have to be applied to some settlements and development sites depending on their tier with the settlement hierarch and location within a settlement” -The market doesn’t support higher density development outside of the core of city locations <ul style="list-style-type: none"> -A policy which provides for no flexibility in the application of housing densities while be counterproductive and will not provide the housing supply as envisaged. - The development industry cannot source finance to build housing that does not fit with actual market needs or demands <p>Adequate supply of land for development</p> <ul style="list-style-type: none"> -welcomes the ambitions of the plan to build over 7000 units over the lifetime of the plan. -has concerns over the emphasis on compact development and concentrating development in the existing urban areas, concerns are raised that the quantum of developable land is overestimated due to insufficient research undertaken in assessing existing constraints. -Development will not be progressed if the construction industry cannot demonstrate financial viability -A review mechanism should be incorporated into the plan that after two years housing delivery targets are examined and if target has not been reached the reasons why. 	<p>National Policy Objective 3c as contained in the NPF is to deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints. Kerry County Council is therefore obliged to implement this policy as part of the County Development Plan irrespective of any perceived challenges to such type of development.</p> <p>Brownfield/infill development will see settlements consolidated with housing located close to services and transport hubs as opposed to greenfield sites at a distance from town centres. This type of sustainable development is therefore supported and encouraged by the Development Plan.</p> <p>Circular Letter NRUP 02/2021 on Residential Densities in Towns and Villages, the Guidelines for Planning Authorities on <i>Sustainable Residential Development in Urban Areas</i> (2009), and the Urban Development and Building Height Guidelines issued by the Minister Under Section 28 of the Planning and Development Act provides that a range and mix of housing types together with specified densities that must be achieved in relation to residential development. These policies proved flexibility in the design and layout of residential developments with the overall objective in accordance with the NPF of consolidating and compacting our settlements.</p> <p>The quantum and location of residentially zoned lands as set out for Tralee, Killarney and Listowel in Volume 2 and for other settlements in the county as set out in recently adopted LAPs are considered suitable and adequate to accommodate the anticipated population growth out to 2028.</p>

	<p>Phased zoning -Due to the current housing crisis De-zoning is counter intuitive. -Preferentially promoting nonviable brownfield sites while rendering the development of other site as contingent on unviable brownfield sites has the potential to result in a significant shortfall in housing provision. Infrastructure -While recognizing that Infrastructure investments require co-ordination across government departments, Kerry County Council should be empowered to deliver infrastructure requirements</p> <p>Sustainability -When promoting policies for sustainable development and related polices a realistic approach needs to be taken to ensure that the cumulative cost of meeting the requirements of those polices does not undermine the deliverability of new housing</p>	
<p>KE-C1-303 Old Road Partnership</p> <p>KE-C1-351 Orla Sheeran</p>	<p>This submission advocates for increased housing allocation for the town of Rathmore, advocating the designation of Rathmore as a Regional Town rather than a District Town, and advocating increasing the area of zoned land in Rathmore to cater for the proposed increased housing allocation.</p> <p>This submission requests that the population allocation for Kenmare is increased to allow people who were born and reared in Kenmare to build homes on family land or retire in Kenmare.</p>	<p>Kenmare is designated as a Regional Town and Rathmore is designated as a District Town in the Settlement hierarchy by virtue of their current population, functionality and services provided. In allocating future population growth to these towns, the guiding principles as outlined in Section 3.10 were considered. The population growth targets and housing targets as set out in the Core Strategy Table are considered to be an appropriate target for these settlements.</p>
<p>Recommendations Amend Settlement Types Table 3.5 Key Town; Large population scale urban centre functioning as self-sustaining regional drivers, and strategically located urban centres with accessibility and significant influence in a regional and sub-regional context. Regional Town; Towns which provide a housing, employment, or service function serving a local region within the county. The category is broad and ranges from large commuter towns to more peripheral towns.</p>		

Chapter 4 – Towns & Villages – Introduction, Urban Regeneration and Compact Growth		
	Submission Summaries	CE Response and Recommendations
KE-C1-171 Asdee Community Development Association	The submission states commitment to working with the designated regional and district towns in North Kerry for the wider development of this part of the county. It states that reference to Asdee as being in the “hinterland” of towns is outdated, as places interact with each other depending on the various functions and services they provide. Asdee’s amenities, and in particular the natural resources, such as Littor Strand are important regional assets, and many of the businesses in rural towns depend on custom from Asdee. It requests that Kerry County Council show greater regard for the contributions rural communities make to the overall development of the county.	It is acknowledged in the Draft Plan the contribution that rural communities make to the overall development of the County, particularly given that County Kerry is primarily a rural county. The Draft Plan refers to Asdee as a Small Village Settlement as set out in the Settlement Hierarchy Table 3.6. Policy Objectives KCDP 4-59 & KCDP 4-60 relates to ensuring the development of District Towns, Villages and Small Village Settlements as sustainable, vibrant, and prosperous local centres and that any new development respects the scale and character of the existing settlement.
KE-C1-62 Seamus Fleming KE-C1-46 Cllr. Charlie Farrelly	Castleisland Bank of Ireland Building on Main Street should be purchased by KCC and bequeathed to the Local Community following BOI BANK Branch departure from the town – Ideal resource for the Castleisland Community.	This is not a matter for consideration under the county development plan.
KE-C1-71 MJ Kearney	<p>The submission states that the development of the public realm in the Town Centre is a key cornerstone of the development of the town into an attractive destination for all shoppers, businesspeople, workers, tourists and for residents - new and old.</p> <p>Further development of Castleisland's Public Realm including the regeneration of Castleisland Town Centre by creating a European ‘continental Parisienne/Plaza’ feel by widening footpaths etc. and maintaining traditional shopfronts and signage.</p> <p>Create more over the shop residential possibilities and identify vacant sites in the town centre for housing and maximize gov grants for derelict properties etc. Develop the Riocht Town Park /River Walk Takeover and further expansion in both directions east to Tullig and North to the Water Tower will complement the on-street developments.</p>	<p>The draft County development plan provides support for the development of public realm throughout the plan including specific Objectives KCDP 4-16 to KCDP 4-19. The comments regarding Castleisland and its suitability for specific uses would be more appropriately addressed in the Killarney municipal district local area plan 2018-2024 when it comes up for review.</p> <p>No changes recommended.</p>
KE-C1-71 MJ Kearney	The development of the Con Houlihan/Castleisland District/Sliabh Luachra Museum and Exhibition Centre in the Civic Centre.	This is not a matter for consideration under the county development plan, it is a matter for the Municipal District LAP.
KE-C1-290 Ballylongford Enterprise Association	The submission seeks a plan for the derelict buildings in the village of Ballylongford. It also seeks that the boundary be extended (due to flooding in the existing settlement boundary) to include all areas where there is a footpath and the land serviced by these footpaths should be taken over by Kerry County Council and serviced with mains water and sewage. This would attract people into the village and avoid one off housing development in rural areas where there are no existing water and sewage services.	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.

		The settlement boundaries are set out in the Local Area Plans and cannot be amended within the context of this draft Plan.
KE-C1-147 Tarbert Development Association	<p>All rural towns/villages have suffered from loss of services over the past years resulting in lots of vacant houses and even some dereliction and this needs to be addressed if we want to attract more people to come and live in these settlements. This issue could be addressed by; -</p> <ul style="list-style-type: none"> • Supporting the provision of quality employment in the area so that our young people can earn enough money so that they can enjoy the quality of life there aspire to. There must be greater support for enterprise and innovation by all relevant bodies. • The Council to be more proactive in pursuing the owners of unkept and derelict properties. • A register of vacant properties be compiled for each town/village and the housing dept could use this, in the first place, to address the homeless issue. • More State funding should be sought for the Town and Village Renewal scheme. The maximum amount of €200K is very little for any major upgrade to an area and in any given year only 6 projects in the county can be put forward for this funding. • Our village centres could be improved by having a proper traffic management plan for the streets and adequate off-street parking. This would improve the safety of pedestrians, wheelchair users and the elderly. • Do whatever is necessary to retain local services such as schools, post office, churches, fuel depots, electric charge points and retail food stores etc. 	<p>Chapter 4 Towns & Villages contains a range of policies and objectives to sustain and augment the county's towns and villages. These policies and objectives in collaboration with the community and allied stakeholders offers opportunities for funding in addition to the Town and Village Renewal Scheme.</p> <p>Derelict sites/ Regeneration, it is the policy of the plan to tackle the issue of dereliction throughout the county and to seek the rejuvenation of towns and villages.</p>
KE-C1-259 Maura Healy- Rae KE-C1-311 Danny Healy- Rae	<p>This submission states that wastewater treatment plants must be upgraded at Kenmare, Castleisland, Brosna and Caherdaniel.</p> <p>Noted that this submission has been included in Chapter 4 Towns & Villages but also relates to Chapter 13 Water & Waste Management.</p>	<p>Chapter 13: Water & Waste Management sets out details and objectives in relation to wastewater treatment plants. The provision of these services is the responsibility of Irish Water, it is an objective of the Draft Plan under KCDP 13-3 to facilitate Irish Water investment in capital projects over the lifetime of this plan. Kerry County Council has identified 24 priority settlements in urgent need of wastewater infrastructure investment and these form part of a detailed submission made by Kerry County Council to Irish Waters Small Towns and Villages Growth Programme (STVGP). See Volume 1 Appendices - KCC Submission to Irish Water (STVGP). Irish Water have recently been granted permission (reg ref 22/55) for the upgrading of the WWTU in Kenmare.</p>
KE-C1-256 Maura Healy- Rae KE-C1-311 Danny Healy- Rae	<p>This submission states that under Objective KCDP 4-8, the reference to improved street lighting should be broadened to include LED lighting.</p>	<p>It is not considered necessary to include LED lighting in this objective as Section 1.14.2 Lighting and illumination of Volume 6 Development Management Standards sets out specific details in relation to the provision of lighting. Therefore, this would include the provision of LED lighting.</p>

<p>KE-C1-255 Maura Healy-Rae</p> <p>KE-C1-243 Maura Healy-Rae</p> <p>KE-C1-311 Danny Healy-Rae</p> <p>KE-C1-306 Danny Healy-Rae</p> <p>KE-C1-253 Maura Healy-Rae</p> <p>KE-C1-235 Maura Healy-Rae</p> <p>KE-C1-358 Cllr. Breandán Fitzgerald</p>	<p>This submission states that it should be an objective of this plan that in all towns and villages on National Primary, National Secondary and Regional roads, that a pedestrian crossing should be part of its infrastructure.</p> <p>This submission would also be relevant to Chapter 14 Connectivity.</p> <p>The submission states that footpath infrastructure needs to be developed on the outskirts of all our towns and villages and these places also need to be fully accessible for those with disabilities.</p>	<p>The Design Manual for Urban Roads and Streets (DMURS) provides design guidance and standards for constructing new and reconfiguring existing urban roads and streets, to ensure they are safe for pedestrians and cyclists. It is an objective of this plan to promote a more pedestrian friendly environment through the provision of traffic calming measures and improved pedestrian infrastructure. It is also an objective KCDP 4-15 to prioritise walking routes and to deliver a high level of priority and permeability for walking, cycling etc.</p> <p>The Council Roads Dept have a schedule of works to provide for new and upgraded footpaths throughout the county.</p>
<p>KE-C1-234 Deirdre Horgan</p>	<p>The submission proposes that infrastructure and facilities in town and communities around Kerry becomes Autism friendly. Kerry County Council could consider allocating designated car spaces specifically for families of children with Autism.</p>	<p>Consideration of those with disabilities and mobility issues is a key component of the Draft Plan. 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 which states that “Car parking provision shall be provided for the disabled and mobility impaired in all car-parking developments and should be located in the most convenient locations for ease of uses”. The minimum criteria for such parking provisions are detailed in the National Disability Authority Guidelines Building for Everyone published in 2012 (including any updated/superseding document).</p> <p>Age Friendly car parking spaces should generally be provided, where possible, in all developments and in main towns, near strategic areas e.g., Post office, credit union, doctors’ surgery, civic buildings, etc.</p>

		<p>Recommendation</p> <p>Add the following as a 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>
<p>KE-C1-276 Maura Healy-Rae KE-C1-315 Danny Healy-Rae</p>	<p>The submission states that it should be an objective of the plan that where the council are developing public realm spaces, that toilet facilities are within the immediate vicinity of the public realm area</p>	<p>The Council aims to provide toilet facilities at appropriate locations as set out in Objective KCDP 10-53.</p>
<p>KE-C1-215 Shannon Rangers</p> <p>KE-C1-212 Ballylongford GAA Club</p>	<p>This submission requests that Kerry County Council include as an objective in the County Development Plan the renewal of the villages of North Kerry.</p>	<p>It is the policy of the plan to strengthen and grow our towns and villages through quality development; regeneration and compact growth; building on the strong network of towns and supporting our villages and rural areas. Ballylongford, Ballyheigue and Tarbert are designated as District Towns in the settlement hierarchy while Asdee amongst others is designated as a Small Village Settlement. The Draft Plan states that building critical population mass and addressing the challenges of town centre/village renewal is a key objective of this Plan to ensure the long-term sustainability of many of the settlements in terms of sustainable jobs growth and retail sales. The council promotes the development of a quality public realm and supports the initiatives for renewal and regeneration of the towns and villages by placing a particular focus on identified 'retail core areas' and designated regeneration and opportunity sites. The Draft Plan contains specific objectives relating to the renewal and development of villages within the County, including; KCDP 4-59 and KCDP 4-60.</p>
<p>KE-C1-107 John O'Sullivan</p>	<p>The submission outlines the challenges facing Kerry's towns and villages and states that Kerry has an average household income which is 20% below the national average household income, non-existent basic essential services in many villages and district towns with no public transport from those towns and villages to the bigger towns and Limerick/Cork, inadequate, overflowing sewage treatment plants and no agency accepting the primary responsibility for the economic and social development of the county.</p>	<p>See response to KE-C1-215 and KE-C1-212 above.</p> <p>The plan seeks to develop a strong economy across the county and Chapter 9 – Economic Development outlines the policies and objectives in support of this, including the implementation of the Covid 19 Recovery plan. Chapter 13 -Water and Waste Management details the water and wastewater infrastructural requirements in the county.</p> <p>Connecting Ireland is a nation transportation strategy by the NTA with the aim of increasing connectivity for people living outside the major cities and</p>

		towns which proposes significant increased public transport services across the county.
KE-C1-9 Tom Kennedy	This submission outlines the challenges that are facing rural villages and in particular Ballylongford and the loss of basic services, lack of employment opportunities, lack of investment and funding and untapped tourism potential. It also mentions issues with flooding and coastal erosion.	The draft plan contains objectives and strong policy commitments to the regeneration and renewal of rural towns and villages in the County and also contains a range of site activation measures and initiatives to encourage same. The draft plan acknowledges and builds on the importance of towns and villages as drivers for rural economic growth, and it sets out objectives and principles on placemaking for enterprise development.
KE-C1-358 Cllr. Breandán Fitzgerald	The submission raises the concern that the switch from long-term letting to short-term letting is creating a critical shortage of long-term accommodation in towns and villages.	<p>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.</p> <p>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.</p>
KE-C1-363 NEWKD	<p>The submission requests that the following wording is included at the end of Objective KCDP 4-1 "especially where needed to accommodate existing and increased employment opportunities (e.g., Dingle in tourism season, Listowel and North Kerry re LNG, etc.)".</p> <p>The submission requests that the following wording is included at the end of Objective KCDP 4-2 "including by expanding the village / town limits, and KCC purchasing land, investing in sewage, services, etc. and selling on".</p>	<p>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 centre". It is considered that there is sufficient headroom built into the housing targets and land requirement to cater for any potential seasonal and/or temporary employment opportunities. it is not considered appropriate to include additional wording in this instance.</p> <p>Objective KCDP 4-2 states "Facilitate and support the sustainable development of towns and villages of sufficient scale and quality to be drivers of growth, investment, and prosperity". It is not considered appropriate to include wording which would expand town and village boundaries as the Draft Plan promotes compact and sustainable growth.</p>

	<p>The submission requests that the following wording is included at the end of Objective KCDP 4-4 "including through providing / enhancing broadband coverage".</p> <p>The submission requests that the start of Objective KCDP 4-22 reads as follows "Implement a programme of active land management to maximise potential by tackling dereliction, vacancy and underutilisation of lands...."</p> <p>The submission requests the inclusion of villages in Objective KCDP 4-31.</p>	<p>The Draft Plan includes provisions for Cluster Developments [Section 5.4] which will accommodate residential developments in smaller settlements in a sustainable manner.</p> <p>Objective KCDP 4-4 states "Target a range of current national funding mechanisms to facilitate the rejuvenation of town centres and public realms in towns and villages". It is not considered necessary to include wording relating to providing/enhancing broadband coverage within this objective as this is dealt with in Chapter 14 Connectivity, specifically Objectives KCDP 14-65 to 14-71.</p> <p>It is not considered necessary to include the additional wording as Active Land Management in itself aims to maximise potential of lands throughout all settlements in the county.</p> <p>The council will continue to encourage and support regeneration schemes throughout all towns and villages within the county, hence there is no need to include reference to villages.</p> <p>Recommendations Amend KCDP 4-31 to state - Encourage and support the use of town & village centre regeneration schemes, including:</p> <ul style="list-style-type: none"> • Repair & Leasing scheme • Buy & Renew scheme • Living over the shop scheme
<p>KE-C1-380 MARTIN MULVIHILL</p>	<p>The submission requests that the Local Authority maximise the potential of derelict properties within the village, purchase land in and around our village, invest in sewage and treatment infrastructure and sell on. Also states that consideration should be given to allow expanded development within Moyvane village speed limits to support subsequent planning applications and provision of serviced sites.</p>	<p>Objective KCDP 4-22 [detailed above] 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". The Draft Plan makes provision for Cluster Developments – see response to Submission KE-C1-363. In relation to water & wastewater infrastructure, this is primarily the responsibility of Irish Water – see response to Submission KE-C1-259, however Moyvane is included on the STVGP.</p>

<p>KE-C1-391 Cahersiveen Community and Business Alliance</p> <p>KE-C1-173 Milltown Community and Chamber Alliance</p>	<p>The submission supports the legislative powers in respect of the derelict sites register (page 55) which are long overdue, and the levies generated ought to be used to upgrade the public realm in the communities in which they are raised.</p>	<p>Objective KCDP 4-28 states “Use the Derelict Site legislation to identify and address issues of dereliction within the towns and villages of the County and actively seek to use CPO where necessary”.</p>
<p>KE-C1-391 Cahersiveen Community and Business Alliance</p>	<p>The submission states that the Rural Regeneration Development Fund (announced in July 2020) should be expedited as a priority for Cahersiveen in meaningful consultation with the communities. It further states it is an objective of the RRDF project to connect the marine aspect of the town, the marina and pier with the residents of the town and visitors. Casual trading might also be considered there (as exists at Fair Field) to encourage the linger factor by the water and encourages the council to ensure the waterside and the Greenway are well connected to the town centre.</p>	<p>The Council will actively engage with the local community to roll out the Cahersiveen Regeneration Project in order to boost tourism and economic footfall in town.</p>
<p>KE-C1-385 Cllr Jackie Healy- Rae</p>	<p>The submission requests that a survey of every town, village and settlement is carried out to assess levels of vacant buildings/properties. Also states that more work needs to be done to inform members of the public what exactly is available to them in terms of supports for refurbishing vacant properties and the planning implications of doing so.</p>	<p>Objective KCDP 4-22 and 4-28 [detailed above]. It is the policy of the Council to engage in Active land management in order to tackle dereliction and vacancy.</p>
<p>KE-C1-385 Cllr Jackie Healy- Rae</p>	<p>The submission seeks the preparation of a masterplan for the town of Castleisland to deal with traffic, public realm spaces and improvements to the town centre through urban design measures, which will help access capital funding to develop areas of the town.</p>	<p>It is considered more appropriate to address these issues within the forthcoming review of the Municipal District Local Area Plans.</p>
<p>KE-C1-385 Cllr Jackie Healy- Rae</p>	<p>The submission requests clarity on KCDP 4-32 in terms of timescales and Council to promote further uptake of Repair and Lease scheme. The submission requests further clarity on KCDP 4-34 in terms of “identifiable address”. The objective currently states, "Require that a separate and distinctive point of entry with an identifiable address be provided as part of any proposals for residential development in the upper floors of retail/commercial premises."</p>	<p>The Repair and Lease scheme is ongoing and is promoted by the Local Authority. It is considered that “Identifiable Address” is to ensure that the newly formed residential unit has its own address, this might require the addition of a letter to the existing address e.g.: 4A Main Street.</p>
<p>KE-C1-195 Caroline Hurley</p>	<p>The submission states that the issue of dereliction needs to be addressed and use any government initiatives available.</p>	<p>See response to Submissions KE-C1-380, KE-C1-385 and KE-C1-391.</p>
<p>KE-C1-106 An Post</p>	<p>The submission requests that Kerry County Council engage with An Post should any future Public Realm/Urban Area Plan propose to amend delivery hours in Town Centre locations.</p>	<p>It is the policy of the council to work with all service providers/stakeholders and to facilitate any proposed services or facilities. the council already provide flexibility under the land use zonings and objectives in the CDP in relation to public facilities and infrastructure (see</p>

	The submission requests that the Plan provides additional flexibility under the land use zonings and objectives in relation to An Post's existing facilities and operational requirements for both its retail and distribution/logistics-type land uses. The submission also requests the inclusion of a new land use classification – postal facilities – in the County Development Plan and identifying this use as 'Permitted in Principle' or 'Open for Consideration' across all zoning objectives.	zoning matrix). It is considered not necessary to include a new land use classification –postal facilities–in the CDP matrix.
KE-C1-173 Milltown Community and Chamber Alliance	The submission welcomes the Local Authority's commitment and are keen to ensure the rapid, yet careful, rollout of the measures to address "the legacy of rapid unplanned growth/edge of town growth, by facilitating amenities and services catch-up".	The Council acknowledges that there is a need for continued collaboration with the wider communities and with all agencies and stakeholder to deliver on the plans and projects. A coordinated approach is essential for the sustainable development of the town in order to improve the quality of life and experience of all residents and visitors. 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 town to promote a more pedestrian friendly environment. It is considered that these objectives are sufficient
KE-C1-173 Milltown Community and Chamber Alliance	The submission welcomes Objectives KCDP 4-3, KCDP 4-18, KCDP 4-19, KCDP 4-43 and KCDP 4-52. The attainment of Objective KCDP 4-18 requires the development of a suitable buffer zone – free from vehicular traffic.	Noted.
KE-C1-434 Listowel Business & Community Alliance	The submission states that the 'Town Centre First' policy approach needs to be the priority for Listowel. A Town Centre Health Check was completed for Listowel in 2018. Listowel needs investment and commitment from KCC to help it become a vibrant place for living, investing, and working in (by providing sustainable jobs and remote working hubs) by identifying and using its powers (derelict sites, CPO) to remove the blight of underused and vacant urban building stock. There are also opportunities for positive development and the reuse of vacant Kerry County Council owned lands in Listowel town centre.	The Draft Plan states that "When considering advancing local authority initiatives, and submitted development proposals, the Council will adopt the town centre first approach in a manner consistent with the principles of compact growth and mixed-use development, as committed to in the 'Programme for Government'. Kerry County Council aims to achieve this through consolidation, active land management and by prioritising development on infill and brownfield sites. Specifically Objective KCDP 4-5 supports Town Centre Health Check Reports and Objective KCDP 4-6 facilitates and supports the development of an Action Plan for Town Centre Renewal for settlements in collaboration with communities and stakeholders.
KE-C1-111 Mol Teic (t/a Dingle Hub)	The Modal and Intervention Hierarchy of the National Investment Framework for Transport in Ireland (NIFTI) should inform the Development Plan and that specifies a Modal Hierarchy of Active Travel, Public Transport and Private Vehicles (in that order). At a practical level, active travel routes should be provided in communities, where possible,	It is a strategic aim of this Development Plan to co-ordinate transport and land use planning. The NIFTI is a high-level strategic framework for prioritising future investment in the land transport network. Reference to the NIFTI is made under section 14.3 Sustainable Transport of the Draft

<p>to enable walking and cycling and this should apply to access to all schools and public buildings and facilities;</p> <p>Suitable infrastructure should be provided, in appropriate locations, to support sustainable transport/mobility. This should include bus stops and shelters; facilities for storing bicycles (near bus stops) to enable multi-modal travel; integration of public transport services with connecting buses etc. and suitable bus shelters and bus stops located in town centres and other suitable locations;</p> <p>With an increasing number of older people living in Kerry (as outlined in Section 6.1.1 below[2]), together with many older tourists visiting the county, access to services and facilities should be age-friendly and accessible;</p> <p>Adequate electric vehicle charging facilities (with sufficient fast charging) should be available in towns, villages, public car parks, tourist destinations and other locations;</p>	<p>CDP. The Draft Plan contains several objectives in relation to sustainable transport in Chapter 2 Climate Change, Chapter 4 Towns & Villages, Chapter 6 Sustainable Communities and Chapter 14 Connectivity, as well as the Town Development Plans.</p> <p>Objectives 14-5 & 14-6 clearly set out the Council’s intention to specify baseline figures and targets for modal share in new / varied Local Area Plans to encourage a modal shift away from the private car to more sustainable forms of transport, such as public transport, cycling and walking and 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. No amendment proposed.</p> <p>Public transport infrastructure is a key component of the Draft Plan with Objectives KCDP 14-45 to KCDP 14-47 relating specifically to bus transport. 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>In line with national population trends the County’s population is living longer which will require specific responses to ensure the delivery of age friendly communities into the future. The Council is committed to ensuring that age friendly thinking will influence design and location of housing and community facilities including the delivery of transport, set out in Section 6.2.6 and Objective KCDP 6-24 of the Draft Plan. Furthermore, Objective KCDP 6-23 ensures that all buildings, public and open spaces, recreational and amenity areas are accessible for people with disabilities, having regard to the Building Regulations, the objectives of ‘Building for Everyone’ (National Disability Authority) and ‘Access for the Disabled’ (No. 1 to 3) (National Rehabilitation Board)”. Also see response to Submission K-C1-234 which relates to accessible car parking.</p> <p>The rollout of Electric Vehicle (EV) infrastructure will be outlined in the Electric Vehicle Charging Infrastructure Strategy 2022-2025.</p>
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	Because Mobility as a Service (MaaS) is increasing in popularity internationally, provision should be made for it in the Development Plan. (MaaS integrates various forms of transport services into a single mobility service accessible on demand. A MaaS operator facilitates a diverse menu of transport options to meet a customer's request, be they public transport, ride-, car- or bike-sharing, taxi or car rental/lease, or a combination thereof).	A mobility service such as MasS is not a function of the County Development Plan.
KE-C1-111 Mol Teic (t/a Dingle Hub) KE-C1-147 Tarbert Development Association	It is requested that KCDP 4-15 is amended to include a specific reference to prioritising 'walking routes and to deliver a high level of priority and permeability for walking, cycling and public transport modes to schools'. Encourage walking and cycling especially to schools.	The comments are noted, the objective is broad 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. Furthermore, 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. Recommendation 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 the when consolidating development of higher densities within existing urban centres we the creation of create accessible, permeable links attractive, vibrant, and safe places to work, live, shop and engage in community life. to places of work, retail, services, educational and community facilities.
KE-C1-111 Mol Teic (t/a Dingle Hub)	It is recommended that provision be made for bicycle parking and electric vehicle charging (including some rapid charging) in town centres (including public car parks and car parks associated with the retail and entertainment).	See above response to KE-C1-111.
KE-C1-111 Mol Teic (t/a Dingle Hub)	Dingle Town does not have a Community Centre and, to support the aspirations of the Development Plan, it is recommended that, in a town the size of Dingle, the Plan should recommend and provide for such an essential facility.	This should be addressed at a more local level through the review of the Municipal District Local Area Plans.
KE-C1-199 Dingle Business Chamber	The submission seeks that the Dingle Town Park is enhanced to open it up for many more community uses and also extra access points to the Town Park are implemented.	Funding has been secured under the Outdoor Recreation Infrastructure Scheme (ORIS) towards the upgrading of Dingle Park. Further policies and objectives relating to the park are contained in the Corca Dhuibhne EA LAP 2021-2027.

<p>KE-C1-131 Tobar Dhuibhne - Plean Teanga Chiarraí Thiar</p>	<p>This submission refers to the Language Plan for West Kerry: Tobar Dhuibhne, Plean Teanga Chiarraí Thiar (2018 - 2025). The language plan was given a statutory basis under Acht na Gaeltachta 2012. The submission outlines the primary aim of this plan is to increase the number and concentration of Irish speakers both in the home and in the community in Gaeltacht Chorca Dhuibhne. See also response to KE-C1-131 under Chapter 8 – Gealtacht Areas</p>	<p>The NPF emphasises the importance of the language planning process, prescribed under Acht na Gaeltachta 2012. Kerry County Council acknowledges the importance of the Irish language as the vernacular of the Gaeltacht and for the promotion of the language outside the Gaeltacht. The Council therefore is committed to actively supporting and facilitating the implementation of language plans in Gaeltacht Language Planning Areas, and Bailte Seirbhíse Gaeltachta (BSG). There are three Bailte Seirbhíse Gaeltachta (BSG) designated in the County- Tralee, Dingle and Cahersiveen. It is recognised that these towns which are situated in or adjacent to Gaeltacht Language Planning Areas have a significant role in providing public services, recreational, social, and commercial facilities for Gaeltacht areas.</p> <p>New objective: <i>Facilitate and support Language Plans of the County for Bailte Seirbhíse Gaeltachta - Daingean Uí Chúis, Tralee and Cahersiveen, to achieve their target of increasing the number of daily Irish Speakers.</i></p>
<p>Recommendations</p> <p>Add the following as a new objective: <i>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</i></p> <p>Amend KCDP 4-31 to state - Encourage and support the use of town & village centre regeneration schemes, including:</p> <ul style="list-style-type: none"> • Repair & Leasing scheme • Buy & Renew scheme • Living over the shop scheme <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 the when consolidating development of higher densities within existing urban centres we the creation of create accessible, <i>permeable links</i> 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>New objective: <i>Facilitate and support Language Plans of the County for Bailte Seirbhíse Gaeltachta - Daingean Uí Chúis, Tralee and Cahersiveen, to achieve their target of increasing the number of daily Irish Speakers.</i></p>		

Chapter 4 – Towns & Villages - Active Land Management and Retail		
	Submission Summaries	CE Response and Recommendations
KE-C1-237 Michael O'Shea KE-C1-227 Liam & Mary Scully KE-C1-108 Liam & Mary Scully KE-C1-305 Cathy Donoghue	The submission states that lands adjacent to established educational facility be preserved for the sole purpose of educational services expansion and not for any other use. The submission specifically references Nagle Rice Primary School in Milltown.	The Local Authority is supportive of the expansion of educational facilities subject to normal planning considerations. In relation to Nagle Rice Primary School in Milltown it is considered that this would be more appropriately addressed at Municipal District Local Area Plan level.
KE-C1-513 Mikey Sheehy	That applications to upgrade and reconstruct vacant and derelict properties be a priority including when an appropriate change of use is required.	It is an objective of the plan under Section 4.3 to facilitate and support the development of vacant and derelict properties.
KE-C1-195 Caroline Hurley	The submission states Planning like everything else is subject to evolving laws, directives, policies and strategies. Every decision being taken must consider impacts in numerous sectors. Our Rural Future must be balanced carefully with Town Centres First.	The Plan incorporates aims, objectives, policies, and guidelines to provide for the proper planning and sustainable development of County Kerry. The Plan is a spatial planning framework that gives effect to the delivery of sustainable and planned economic and social development in a manner consistent with National, regional higher-level plans and strategies.
KE-C1-137 Liam Geary	The submission seeks allowances for business property owners and make it compulsory to use upstairs for accommodation in all towns to bring life and people back into towns. The submission also states that charges should be placed on properties that are unused for over a year and increase over time.	Section 4.3.7 relates to Upper Floors / 'Living over the Shop' with specific Objectives KCDP 4-31 supporting the use of town centre regeneration schemes, including: Repair & Leasing scheme, Buy & Renew scheme and Living over the shop scheme and KCDP 4-32 promoting the refurbishment and reuse of the upper floors of retail/commercial premises for residential purposes in town and village centres. Article 10 (6) (a) of the Planning and Development regulations also permits for a limited period the change of use of vacant properties such as retail/public houses into residential use, subject to a number of criteria. Finally, the Development Contribution Scheme (2017) contains a reduction in contributions for town centre, infill and vacant site developments.
KE-C1-127 Farranfore Development Association	In order to allow Farranfore to develop in an orderly manner, it is important that wastewater treatment be upgraded to support Farranfore's current needs, facilitate future growth to allow Farranfore reach its full potential. This submission supports the N22 realignment. The industrial activities in Farranfore are protected and developed sustainably.	The upgrading of the wastewater treatment plant in Farranfore is a matter for Irish Water (IW). It is an objective of the plan under objective 13-15 to facilitate and support (by Irish Water) the provision of new and the upgrading of existing wastewater infrastructure in the county. The comments in relation to the N22 are welcomed and noted.

	<p>The consolidation of the village settlement and the retention and improvement of local services and facilities to serve the village and surrounding areas</p> <p>Its location as a strategic transport hub is maximised and developed to its fullest potential.</p> <p>The importance of the airport and rail line must be recognised, and its further development is vital to the economy of the County and the wider region.</p>	<p>Farranfore is recognised as a vital transport hub for the sustainable development of the County. The Draft Plan sets out several Objectives such as KCDP 14-20 “Protect and sustainably develop the County’s principal transportation assets including ports, Kerry Airport, and strategic road and rail corridors” and KCDP 14-50 states “Facilitate and support the development of an integrated multi-modal transport system to and from the airport”.</p> <p>The Killarney Municipal District Local Area Plan 2018-2024 also sets out more specific objectives supporting the development and enhancement of Farranfore.</p>
<p>KE-C1-258 Maura Healy-Rae KE-C1-311 Danny Healy-Rae</p>	<p>This submission seeks that it is an objective of this plan that parking rates are competitive and reasonable in town centres.</p>	<p>The Council are preparing a County Wide Parking Strategy. Parking charges are not a matter for the CDP.</p>
<p>KE-C1-391 Cahersiveen Community and Business Alliance</p>	<p>The submission welcomes the emphasis on town-centre developments so as to avoid sprawl but opposes linking the number of permissible retail developments to population size as it would limit the economic development of towns such as Cahersiveen and villages such as Waterville, Sneem, Portmagee and Knightstown.</p>	<p>It is considered that the policy in relation to retail development is in line with both national and regional policy, as well as the Retail Planning Guidelines. It is the intention of the council to prepare a retail strategy for the county. It is an objective of the plan to promote town centre developments. In particular the draft plan includes Objective KCDP 4-37 which seeks to promote the development of the town centre as the primary location for retail and as an attractive location for shopping, and KCDP 4-38 which seeks to protect the vitality and viability of town centres by ensuring that all significant retail & office developments, with the exception of neighbourhood shops are located in the town centre.</p>
<p>KE-C1-111 Mol Teic (t/a Dingle Hub)</p>	<p>The submission states, recognising the importance of a good online presence for retailers, it is recommended that the online presence should, where possible, seek to build national and international markets and not just target solely local customers.</p>	<p>The contents of the submission are noted; however, the marketing detail of online retailing is not within the remit of a land use plan such as the County Development Plan. No amendment proposed. It should be noted that the Draft Plan promotes digital connectivity within Chapter 14.</p>
<p>KE-C1-181 Avison Young (on behalf of Tesco Ireland Limited)</p>	<p>The submission seeks that provision of policies and objectives that can spur investment in the convenience retail sector and provide for adequate convenience floorspace to be allocated in settlements across the County in Key Towns and Regional Towns that have been identified in the Plan including inter alia Tralee, Killarney, Listowel, Castleisland, and Dingle.</p> <p>The submission seeks that the Plan supports and accommodates the growth of ‘Click + Collect’ retail services and Grocery Home Shopping.</p>	<p>The Regional Spatial and Economic Strategy 2020 (RSES) identifies Kerry’s main towns of Tralee and Killarney as Key Towns highlighting that retail developments in these larger centres are needed to ensure economic vitality and viability within their shopping cores. Notwithstanding this, the smaller towns and villages within Kerry are also recognised for their important retailing function, albeit on a smaller scale, to serve the day-to-day needs of the people in their hinterlands. The RSES further supports the preparation of a Retail Strategy in accordance with the Retail Planning Guidelines for Planning Authorities 2012. Objective KCDP 4-43 states that a</p>

		town centre and retail strategy will be completed for the entire county within the lifetime of this plan.
KE-C1-181 Avison Young (on behalf of Tesco Ireland Limited)	Provide flexible land use zoning objectives that will allow sites to be brought forward in the County's towns and settlements for convenience retail development over the lifetime of the Plan.	The Council will prepare a retail strategy for the county.
KE-C1-385 Cllr Jackie Healy- Rae	The submission states it should be an objective of the plan to identify suitable areas for warehousing with the ever-increasing demand of online shopping should look at attracting distribution/storage centres in areas with good transport links throughout the county.	Specific land use zoning for warehousing , commercial, enterprise will form part of the LAP review process for each municipal district. The availability of services and infrastructure is an important consideration in this designation.
Recommendations		
No proposed amendments.		

Chapter 5 – Rural Housing

Chapter 5 – Rural Housing - Policy Context, Planning for the Future Growth and Development of Rural Areas and Cluster Developments in Village Settlements		
	Submission Summaries	CE Response and Recommendations
KE-C1-184 Steve Edwards	The submission states support for Objectives KCDP 5-1 and KCDP 5-23 - KCDP 5-29 and states that this applied to both North and South Kerry and also applies to wind farm developments.	Objectives in Chapter 5 apply to the county as a whole. Objectives KCDP 5-23 to KCDP 5-29 apply to the renovation and restoration of buildings and are supported by this submission.
KE-C1-131 Tobar Dhuibhne - Plean Teanga Chiarraí Thiar KE-C1-355 Dúchas an Daingin	<p>The submission strongly highlights that the settlement issue is at the heart of the Irish language and Gaeltacht question. It is highlighted that the sustainability of Gaeltacht areas and Irish as a community language is dependent on people that are able and willing to speak Irish, living and actively participating in every aspect of the community in the Gaeltacht. The particular importance of facilitating this is highlighted in the submission. It is stated that the work of the language plan is in vain if people who speak Irish every day cannot live in the Gaeltacht either through building their own house or by settling there by other means.</p> <p>The submission states that it is very important and appropriate that specific language policies be set out for Gaeltacht people that speak Irish every day, as recommended by (Doyle Kent, 2020). It is stated that policies should be aimed at ensuring that housing planning in the Gaeltacht is focused entirely on sustaining and strengthening communities of the 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 a rural area:</p>

<p>With reference to Chapter 5 Rural Housing, the submission highlights that there is no reference to Irish, the Gaeltacht or to language impact assessment in Gaeltacht areas as part of the vision set out for rural housing and it is stated that this is a serious omission.</p> <p>The submission outlines that the aim of language planning is to increase the number of daily Irish speakers in the Gaeltacht. It is stated that this is difficult to achieve if Gaeltacht people and speakers of Irish cannot settle permanently in their own Gaeltacht. The submission recommends that specific policies be made in relation to housing in the Gaeltacht and that priority be given to Irish speakers wishing to build or buy a house in the Gaeltacht.</p> <p>The submission also recommends that specific questions about ability and use of the language to be included in the planning application form and that Gaeltacht people be prioritised.</p> <p>Specific amendments have been suggested to Section 5.5.2 Rural Housing of the Draft Plan, as follows.</p> <p>Section 5.5.2: include the following amendments:</p> <ul style="list-style-type: none"> (a) Or linguistic (e) priority be given to Gaeltacht people to build houses in the Gaeltacht <p>Submission requests that objective KCDP 5-12- be amended as follows:</p> <p>In Rural Areas under Significant Urban Influence applicants shall satisfy the Planning Authority that their proposal constitutes an exceptional rural generated housing need based on their social and / or economic links ...Include linguistic after economic, It is requested that a new subsection (f) be included as follows:</p> <p>(f) people that were reared with Irish or that contribute to the Gaeltacht way of life or that are seeking to raise their family through Irish.</p> <p>It is requested that KCDP 5-13 be amended to include linguistic and (f) people that were reared with Irish or that contribute to the Gaeltacht way of life or that are seeking to raise their family through Irish.</p> <p>It is requested that 5.5.2.1 KCDP 5-21 be amended to include the following: ensure that any residential development in the Gaeltacht contributes to the language as the daily community language of the Gaeltacht.</p> <p>Holiday homes</p> <p>It is stated that the excessive number of holiday homes in the Gaeltacht has had a negative impact on the community and the language. (Over 50% of the houses in Dún Chaoin, An Fheothanach, Baile an Fheirtéaraigh are holiday homes). The submission states that as the damage is already done, it does not consider that objective KCDP 5-21 will help with this situation and highlights the difficulty people have trying to secure accommodation in these areas.</p>	<ul style="list-style-type: none"> 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>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>Holiday Homes and Vacant Homes</p> <p>The points raised are noted, however it is a policy of the draft County Development Plan (and the Kerry County Development Plan 2015-2021) not to permit the development of holiday homes or second homes in the rural area, as set out under section 5.7 of the draft Plan.</p>
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<p>KE-C1-111 Mol Teic (t/a Dingle Hub)</p>	<p>Based upon the experience of the Dingle Hub, it is recommended that the Council, in conjunction with other public bodies, should publish a clear policy across all the public bodies, that supports a coordinated network of local Connected Hubs (of different scale) that can facilitate remote workers, encourage and support start-ups and small companies and also cater for larger companies of scale.</p>	<p>It is acknowledged that a connected Hubs network has a key role to play in supporting clients, their employees and companies looking for solutions to retain their staff and productivity. As outlined in section 9.7.4 of the Draft CDP a Connected Hubs Network is already in operation by The National Hub Network. This is a Government of Ireland initiative that provides a vehicle for individual hubs to come together under a shared identity to maximise the economic opportunity of remote working. The Kerry Hub Network forms part of the Connected Hubs Network. Objectives KDCP 9-48, 9-49 in the County Plan set out clearly the Council's intention to support and facilitate the development of a network of hubs.</p>
<p>KE-C1-43 Coiste Forbartha na Sceilge</p>	<p>In this submission Coiste Forbartha outlines that it requests KCCs assistance to acquire a serviced site, which would then be available for social and affordable houses. To this end, the Coiste Forbartha has identified a number of suitable sites within the boundary of Dún Géagáin village. As a matter of urgency, the Coiste requests Kerry Co. Council to work with the Coiste to make the provision of a serviced in the Village of Dún Géagáin a reality.</p>	<p>Dún Géagáin is identified as a village in the Settlement Hierarchy (Table 3.6). It is the policy of the plan to ensure the sustainable development of a network of towns and villages in the county to act as service and employment centres for the surrounding hinterland and to facilitate the provision of housing, infrastructure and services having regard to settlement type. It is also the policy of the plan to facilitate the development of cluster type development within such serviced settlements.</p> <p>To acquire a site for development would not be within the remit of the County Development Plan. Coiste Forbartha na Sceilge are therefore advised to liaise with the Housing Department of Kerry County Council directly on this issue.</p>
<p>KE-C1-191 Marie Moloney KE-C1-327 Marie Moloney</p>	<p>The submission states that Kerry County Council should ensure that there are adequate water services, footpath connectivity and school capacity to facilitate cluster developments.</p> <p>The submission states that the town boundaries should be extended to areas on the outskirts of towns that have a cluster of residential houses.</p>	<p>The provision of cluster type developments will be in accordance with the requirements of the Development Plan, with particular emphasis being placed on adequate wastewater treatment. Objective KCDP 5-11 will result in the creation of guidelines for these cluster developments, which will deal with issues raised in the submission.</p> <p>The extension of the town boundaries to include peripheral single house development would necessitate zoning significant tracts of undeveloped lands between these dwellings and the established built-up areas of the town. This would constitute unnecessary and unjustifiable over zoning and would be contrary to the proper planning and the sustainable development of the area.</p>
<p>KE-C1-205 Toghcháir na Tuaithe</p>	<p>This submission supports the development of clusters in order to combat one-off housing and states that a defined boundary should be set out.</p>	<p>Cluster developments are supported in the Development Plan by objectives KCDP 5-8 to 5-11.</p> <p>The Development Plan is not defining a settlement boundary for small village settlements, nor is it zoning land in these settlements. If</p>

		settlement boundaries are defined for all small village settlements it will be done as part of the local area plan process. It is the policy of the council to consolidate the existing pattern of development around these focal points and utilise existing services in the area. Any such development will therefore have to consolidate a settlement rather than result in an extension or enlargement of suburban development into the countryside.
KE-C1-357 HW Planning	The submission requests a wording amendment to Section 5.4 to allow for existing or permitted holiday home developments in rural areas to become permanent residence. The submission further requests the inclusion of Sheen Falls (Mountain View, Forest View) to Table 5.1 Settlements where clusters of residential development may be considered.	The Plan does not preclude an application to change the use of a holiday home to a permanent place of residence. A search of recent planning applications shows that numerous applications to do same have been successful where the development meets the standard to be used as a permanent place of residence, i.e., compliance with the Development Management Standards as set out in Volume 6. Settlements as listed in Table 5.1 are those which form part of the Settlement Hierarchy which is set out in Chapter 3 of the Draft Plan. There is no justification to include Sheen Falls, a private leisure type development, as a settlement, as it is considered to not meet the criteria as set out in Chapter 3.
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional objective in Section 5.4, which states “Ensure that cluster developments are safe for children and active travel through a focus on permeability, walk/cycleways, speed reduction to 30km/h, and active travel management.” The submissions rationale for this is that alongside strengthening the vibrancy of towns and villages comes an obligation to make these hubs safe for active travel and children. Strong planning and appropriate infrastructure are necessary to achieve this.	Objective KCDP 5-9 is to facilitate the development of small-scale residential cluster developments in villages and small village settlements listed in Table 5.1 served by individual onsite wastewater treatment systems where there are no plans to provide a capital wastewater scheme and where the design, layout and scale of the residential cluster is commensurate with the scale and layout of the existing settlement. The layout and scale of developments will therefore be dealt with by this objective. The other issues raised can be covered in the preparation of guidelines as part of the Cluster Guidelines, Objective KCDP 5-11.
Recommendations No proposed amendments		

Chapter 5 – Rural Housing - Rural Housing		
	Submission Summaries	CE Response and Recommendations
KE-C1-38 Teresa Oshea KE-C1-97 Maria O'Shea	This submission questions the rural housing policy and outlines the importance of strong and vibrant rural communities. It states that the development plan should favour first homes in areas that have displayed population decline and include targeted population growth in Settlement Nodes where it has been in decline. make a provision in the County Development Plan 2022-2028 for examining each planning application in the context of the familial structure that exists in the area and those that adopt greener technologies in	Chapter 5 - Rural Housing sets out a range of policies and objectives to arrest rural population decline and to sustain rural villages. In particular, Section 5.4 identifies 38 small village settlements where small scale clusters of housing can be facilitated served by their own individual WWT systems. In addition, areas of the county with a low population density or demonstratable population decline have been identified (other rural

	<p>the design of housing and efforts made to live in a sustainable fashion within the community. Include existing development in cluster developments and allow people to design and develop their own 'place' in line with their own sense of identity in small rural settlements in West Kerry rather than the characteristics of an urban residential clustered development. The submission requests that the Local Authority outline what is considered a genuine social or economic need in the context of small rural settlements and to broaden this definition in conjunction with the communities it is applied to.</p> <p>Bias in favour of urban areas in terms of living and working remotely.</p>	<p>areas). It is an objective of the plan under KCDP 5-14 to accommodate demand for permanent residential development in these areas as it arises subject to other normal planning criteria.</p> <p>The County development plan as a land use planning framework 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.</p>
<p>KE-C1-67 Knockaderry National School Board of Management,</p>	<p>There is a lack of available housing in the catchment area of Farranfore village to maintain the current School population. The Board of Management believe that the wastewater treatment plant capacity needs to be increased to allow more development to happen.</p>	<p>Farranfore is designated as a District Town in the settlement hierarchy with a population allocation of 37 and housing target of 29 residential units. In addition, there is sufficient lands zoned in the Killarney M.D. Local Area Plan 2018-2024 to cater for the anticipated population growth however, the upgrading of the WWT plant (if necessary) is a matter for Irish Water.</p>
<p>KE-C1-299 Johnny Healy- Rae KE-C1-238 Johnny Healy- Rae KE-C1-193 Marie Moloney KE-C1-313 Danny Healy-Rae KE-C1-282 Maura Healy- Rae</p>	<p>The submission states that the plan should make provision for people to live in rural areas on family land to ensure vibrant communities and retain services and states that there should be a proper policy to allow those with a site available to them, to build rural cottages on family-owned land rather than forcing young people into towns and villages, which would keep rural communities strong and vibrant.</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 famers 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>KE-C1-278 Johnny Healy- Rae</p>	<p>The submission requests that the Occupancy Clause wording is amended to allow someone to sell their property before the 7 years are up in such cases where there is financial pressure or movement is required due to ill health, in exceptional circumstances.</p>	<p>The occupancy condition utilised by the Council is set out in the Ministerial Guidelines "Sustainable Rural Housing". 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>
<p>KE-C1-274 Johnny Healy- Rae</p>	<p>The submission seeks that places with population decline would be given concessions in terms of planning policy in order to sustain rural communities.</p>	<p>The Rural Area Types (map) has been prepared in accordance with the Sustainable Rural Housing Guidelines (2005) which are based upon (amongst other criteria) population and development trends in rural areas.</p>

		'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.
KE-C1-266 Maura Healy-Rae KE-C1-313 Danny Healy-Rae KE-C1-513 Mikey Sheehy	These submissions seek that the rural settlement policy recognises that people who are working from home have economic links to a particular local rural area given that this is stated government policy.	The ability to work from home does not constitute a rural housing need. There are a number of digital hubs that can facilitate remote working in existing small villages and settlements.
KE-C1-263 Maura Healy-Rae	The submission welcomes that the categories of housing need within the rural housing policy have been expanded to include farmers with no family of their own can specify a favoured niece/nephew who wish to build a first home for their permanent occupation.	See response to OPR submission.
KE-C1-257 Johnny Healy-Rae KE-C1-138 Cllr. Michael Cahill KE-C1-337 Rosalie Scanlon KE-C1-301 Maura Healy-Rae KE-C1-296 Maura Healy-Rae	<p>This submission states that planning permission for dwellings should be allowed on existing accesses onto National Roads where it meets all other criteria and should take account of the persons housing circumstances.</p> <p>It requests that a number of factors/criteria should be taken into consideration, these include: availability of an existing entrance, length/frequency of use, traffic generation, safety, access to family home.</p> <p>The submission asks KCC and TII to outline how the generation of increased traffic from existing accesses is assessed or proven and therefore, included as an objective of this plan? The submission references objective KCDP 14-28, which states that the council will "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".</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 kmh apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.
KE-C1-46 Cllr. Charlie Farrelly	Look at letting additional family members who are applying for Planning Permission to use existing exit's/entrance's when applying for planning permission	The sharing of existing exits/entrances by family members onto the local road network is acceptable however, the creation of new or the intensification of existing entrances onto the National Road Network is country to National Policy and in accordance with Section 14.4.1 of the plan is not permissible.
KE-C1-313 Danny Healy-Rae	This submission supports the KE rural policy amendment which states that under 'rural areas under significant urban influence' and in 'rural areas under urban influence' that the categories of housing need include farmers with no family of their own can specify a favoured niece/nephew who wish to build a first home for their permanent occupation.	See response to OPR submission.

<p>KE-C1-313 Danny Healy-Rae</p> <p>KE-C1-265 Maura Healy-Rae</p>	<p>The submission welcomes that ‘category (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’ in ‘Rural areas under urban influence’ has been added as a category of housing need in ‘Rural areas under significant urban influence’.</p>	<p>See response to OPR submission.</p>
<p>KE-C1-205 Todhchaí na Tuaithe</p>	<p>The submission requests an amend to the rural housing policy by introducing a new zoning-area category under Rural Area Types (pp. 76–7), i.e., ‘Linguistically Sensitive Rural Area’ and proposes the following objectives:</p> <p>KCDP 5-30 To help and encourage Irish speaking applicants looking for planning in Gaeltacht areas throughout the planning process to ensure a successful outcome and reduce their costs.</p> <p>KCDP 5-31 To recognise the Council’s intrinsic need for Irish speaking individuals and families to settle in its Gaeltacht areas and to positively discriminate in favour of planning applications from applicants who speak Irish.</p> <p>KCDP 5-32 Empower young Irish speaking families in these areas by actively encouraging them to acquire first homes in the area, whether through purchase, renovation or self-build.</p> <p>KCDP 5-33 Regulate the holiday home market in the area through the implementation of language criteria for the purchase of second homes by non-Irish speakers.</p> <p>KCDP 5-34 The following clause should be added to advertisements of property for sale in these areas:</p> <p>‘This property is located in a linguistically sensitive area. Purchase by a non-Irish speaking household could tip the balance of the community language in favour of English. For this reason, purchase of this house is subject to linguistic criteria.’</p>	<p>Points raised are noted, with respect to the issues raised and responses made submission numbers 1-131, 1-355, 1-393 and 1-342 should also be considered.</p> <p>The policies and the objectives relating to housing, the conservation/promotion of the Irish language and other Gaeltacht issues are a main tenet of the Draft Plan.</p> <p>The protection of the linguistic and cultural heritage of the Gaeltacht including the promotion of Irish as the community language is included in the plan. The unique linguistic and cultural heritage of the Gaeltacht including the promotion of Irish as the community language will be protected. Objective 8-1/2 seeks to protect the linguistic and cultural heritage of the Gaeltacht in including the promotion of Irish as the community language.</p> <p>The issue of Irish language use, population change, and housing is complicated. However, it must be noted that while many of the electoral areas recorded a decrease in population there was still an annual increase in the number of dwellings. There has also been a steady decrease in the numbers /percentage speaking Irish. In terms of the Gaeltacht EDs the number of daily Irish speakers in 2011 was 1,631 in 2016 it was 1,283, this constitutes a 21% reduction from 2011 to 2016.</p> <p>It has been the policy of the Council for many years (and over many CDP) to support and meet the needs of people who wish to establish permanent, primary residences in order to establish and maintain a vibrant community and to limit the number of holiday homes. Applications for dwellings are permitted subject to compliance with the settlement strategy of the county plan. Permission has been granted for 99 rural homes in the period 2015-2021 in the Gaeltacht area, with additional homes permitted in settlements in the Gaeltacht.</p>

		<p>A linguistic rural area type is not included in the Sustainable Rural Housing Guidelines (or referred to in the NPF). To include one would therefore not follow the guidelines.</p> <p>The majority of the plan area is classified as a Stronger Rural Area in the Kerry County Development Plan 2015-2021. In these areas the council facilitates the provision of dwellings for those who are an intrinsic part of the rural community, which in Gaeltacht areas would include Irish speakers. The corresponding rural area type in the Draft Development Plan is areas under urban influence, where again those forming an intrinsic part of the rural community will be considered.</p> <p>The majority of rural one-off dwellings would have an occupancy clause attached limiting the use of the dwelling to the applicant and as a permanent and primary residence.</p> <p>It is clear from the 2016 Census that the level of holiday homes in some areas far exceeds the local indigenous population. The overall result of this sporadic one-off development is an incremental deterioration of the culture/heritage, visual landscape and in some cases, wider environmental qualities. The regulation or control of property sales in any part of the county would be outside of the remit of Kerry County Council and objectives relating to same can therefore not be included in the Development Plan.</p> <p>In order to underpin the basis for sustainable long-term economic, cultural and social development of the Gaeltacht area, additional policies and objectives will be included in the new County Development Plan. See response in chapter 8</p> <p>It is an objective of the plan under Objective KCDP 8-6 to support the Tobar Dhuibhne (language Plan for West Kerry) 2017 and the Plean Teanga Dhaingean Uí Chúis. Section 8.1 of the plan specifically deals with Gaeltacht areas. It contains policies and objectives for the preservation and strengthening of the language.</p> <p>The council have developed the Scéim Gaeilge 2018 – 2023 which seeks to promote the use of Irish. In particular the Kerry County Councils Irish Office actively supports the Language Planning Process in particular the language plans for West Kerry and South Kerry, two Gaeltacht language</p>
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		<p>planning areas as identified under The Gaeltacht Act 2012. Under this remit, ongoing support is being given to development of language courses, youth structures, saoire Gaeltachta, festivals and to raising the profile and importance of Gaeltacht areas to the tourism sector.</p> <p>Kerry County Councils Irish office supports community development through Fóram Gaeilge Chiarraí, a platform for the Irish speaking and Gaeltacht communities across Kerry. The Fóram continues to play an important role in supporting the development of Irish language policies that promote the use of Irish in Kerry which can be accessed on its website www.ciarrai.com. Along with Conradh na Gaeilge and Glór na nGael, the Fóram supports Irish Language Tourism, Gradam Gnó Chiarraí for businesses, Seachtain na Gaeilge and An Fhuinneog is Gaelaí.</p> <p>Restrictions in relation to the purchase of existing dwelling are matters that are outside the remit of the County Development Plan.</p>
KE-C1-336 jimmy Moloney	This submission states that every opportunity should be given to persons to who have lived or worked in a locality for a period of 7 years to build their own home or those who have returned home. The submission states that the current connection to the area clause is too limiting.	Objectives KCDP 5-12 to 5-14 set out in clear terms who can be considered under the rural settlement policy. In Rural areas under Urban influence and other rural areas persons who have spent a substantial period of their lives (i.e) over 7 years can be favorably considered.
KE-C1-358 Cllr. Breandán Fitzgerald	This submission states that Section 5.5 should be amended from "Establishing that there is a genuine economic or social need for permanent occupation" to Establishing that there is a genuine economic or social AND LINGUISTIC need for permanent occupation".	<p>The protection of the linguistic and cultural heritage of the Gaeltacht including the promotion of Irish as the community language is included in the plan. The unique linguistic and cultural heritage of the Gaeltacht including the promotion of Irish as the community language will be protected. Objective 8-1/2 seeks to protect the linguistic and cultural heritage of the Gaeltacht in including the promotion of Irish as the community language.</p> <p>It is an objective of the plan under Objective KCDP 8-6 to support the Tobar Dhuibhne (language Plan for West Kerry) 2017 and the Plean Teanga Dhaingean Uí Chúis. Section 8.1 of the plan specifically deals with Gaeltacht areas. It contains policies and objectives for the preservation and strengthening of the language.</p> <p>The council have developed the Scéim Gaeilge 2018 – 2023 which seeks to promote the use of Irish. In particular the Kerry County Councils Irish Office actively supports the Language Planning Process in particular the language plans for West Kerry and South Kerry, two Gaeltacht language planning areas as identified under The Gaeltacht Act 2012. Under this remit, ongoing support is being given to development of language courses, youth</p>

		structures, saoire Gaeltachta, festivals and to raising the profile and importance of Gaeltacht areas to the tourism sector.
KE-C1-358 Cllr. Breandán Fitzgerald	The submission states the following: there should be no limit/threshold of acreage for a farmer to apply for planning permission; that the "Rural Areas Under Significant Urban Influence" should not be increased; those returning home to live in rural areas should be accommodated; Eligible for planning if you have lived in the area for 7 years in "Rural Areas Under Urban Influence"; Support Irish speakers applying for planning permission in Gaeltacht areas;	There is no limit on farm size included in the Draft Development Plan. If someone returning to an area complies with the rural settlement policy, as set out in section 5.5 then they may be favourably considered.
KE-C1-363 NEWKD	The submission requests that wording "and in certain cases expanded as appropriate" is included in the objective so that it reads "Develop and publish guidelines for cluster housing developments within the existing and in certain cases expanded as appropriate footprint of villages and small village settlements".	The publication of guidelines for cluster developments is covered by Objective KCDP 5-11. The policy for small village settlements is to consolidate development, and not to expand the footprint of these settlements.
KE-C1-381 North Kerry Football Board	This submission sets out the many obstacles to obtaining planning permission in rural areas. The submission states that older people need to be supported and therefore planning permission should be given to family members. Further states that there shouldn't be any increase in development charges for one off rural housing. Also, that the Local Authority should assist those seeking permission along lands adjoining National Roads. Planning permission should also be considered for those who are not from the area.	Objectives 5-12 to 5-14 cover the circumstances in which applicants in the rural area will be considered in terms of rural settlement policy. Development charges are covered by the Development Contributions Scheme 2017. 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 kmh apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.
KE-C1-391 Cahersiveen Community and Business Alliance	The submission notes that the plan contains a chapter on 'rural housing', but there is no chapter on 'urban and village housing'. The submission encourages Kerry County Council to redress this deficit and commits to working with Kerry County Council to supporting the provision of homes in towns and villages, including Cahersiveen, as well as in rural areas.	Chapter 4 covers Towns & Villages and Chapter 7 covers Housing for All. The Development Plan is supportive of housing in the urban area, it is an important tenet of the plan, and it recognises the importance of same for the sustainable development of settlements.
KE-C1-391 Cahersiveen Community and Business Alliance	The submission states that the rural housing policy should include all farmers, including part-time farmers, as well as all those whose livelihoods are associated with the rural economy, including tourism providers. Rural Housing Policy should also define the parameters of "local links". The submission further states that the housing policy needs to be consistent with the implementation of the Irish Language Plan and the work of the Iveragh Gaeltacht Taskforce.	Objectives 5-12 to 5-14 cover the circumstances in which applicants in the rural area will be considered in terms of rural settlement policy. It is an objective of the plan under Objective KCDP 8-6 to support the Tobar Dhuibhne (language Plan for West Kerry) 2017 and the Plean Teanga Dhaingean Uí Chúis. Section 8.1 of the plan specifically deals with Gaeltacht

		<p>areas. It contains policies and objectives for the preservation and strengthening of the language.</p> <p>The council have developed the Scéim Gaeilge 2018 – 2023 which seeks to promote the use of Irish. In particular the Kerry County Councils Irish Office actively supports the Language Planning Process in particular the language plans for West Kerry and South Kerry, two Gaeltacht language planning areas as identified under The Gaeltacht Act 2012. Under this remit, ongoing support is being given to development of language courses, youth structures, saoire Gaeltachta, festivals and to raising the profile and importance of Gaeltacht areas to the tourism sector.</p> <p>Kerry County Councils Irish office supports community development through Fóram Gaeilge Chiarraí, a platform for the Irish speaking and Gaeltacht communities across Kerry. The Fóram continues to play an important role in supporting the development of Irish language policies that promote the use of Irish in Kerry which can be accessed on its website www.ciarrai.com Along with Conradh na Gaeilge and Glór na nGael, the Fóram supports Irish Language Tourism, Gradam Gnó Chiarraí for businesses, Seachtain na Gaeilge and An Fhuinneog is Gaelaí.</p>
<p>KE-C1-391 Cahersiveen Community and Business Alliance</p>	<p>The submission requests that all of West Iveragh should be designated as outside urban influence [Other Rural Area] as there is a deficit of housing in the area.</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>KE-C1-432 Padraig Griffin</p>	<p>This submission requests that the rural housing policy subsection 5.5, relevant paragraphs and objectives KCDP 5-12 and KCDP 5-13 be amended.</p> <p>Extra housing need category to include an exceptional need which may arise where an applicant with a lifelong or life limiting condition requires to live adjacent to or in close proximity to immediate family.</p> <p>KCDP 5-12 In Rural Areas under Significant Urban Influence applicants shall satisfy the Planning Authority that their proposal constitutes an exceptional rural generated housing need based on their lifelong or life limiting condition and based on their, social and /or economic links to a particular local rural area, and in this regard, must demonstrate that they comply with the one of the following categories of housing need:</p>	<p>It is an objective of the plan under Objective KCDP 7-19 to facilitate dependent relative accommodation at an existing dwelling (subject to certain design criteria). This is considered adequate to cater for any exceptional housing need of an individual who has a lifelong/life limiting condition who requires to reside in close proximity/adjacent to immediate family.</p>

	KCDP 5-13 In Rural Areas under Urban Influence applicants shall satisfy the Planning Authority that their proposal constitutes an exceptional rural generated housing need based on their lifelong or life limiting condition and based on their, social and /or economic links to a particular local rural area, and in this regard, must demonstrate that they comply with the one of the following categories of housing need:	
KE-C1-430 William Dore	This submission outline issues of depopulation, zoned land for development in Blennerville and housing for local people.	The submission is noted , Blennerville is located in the environs of Tralee town. Within Blennerville and adjacent areas of Tralee town there are significant tracks of land zoned as R1 residential to cater for existing and future anticipated housing demand. The quantum and location of these lands are considered accurate and suitable .
KE-C1-385 Cllr Jackie Healy- Rae	The submission seeks that the areas around Firies and Currow should be zoned ‘Rural Areas under Urban Influence’ and not “Significant Urban Influence”. The submission also seeks clarification on if Cromane is a “Rural Area Under Significant Urban Influence” as stated on the GIS map, or if it is classed as “Other Rural Areas” as stated in the written statement 5.5.1.3. The submission further states that the occupancy clause would be kept at 7 years for “Rural Area Under Urban Influence” but that it be included in the plan that people who can prove they are in financial difficulty will be accommodated in the selling of their property.	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 resulting designation followed an evidence-based approach and are considered reasonable.
KE-C1-385 Cllr Jackie Healy- Rae KE-C1-513 Mikey Sheehy KE-C1-171 Asdee Community Development Association	The submission requests amendments to KCDP 5-12 as follows: KCDP 5-12 C) should take accommodate people working in other sectors such as tourism and not just those in agriculture and marine. KCDP 5-12 D) should be changed to the following “Persons who are intrinsically linked to their local area going back 12 years in which they wish to build a first-time home for their permanent occupation. This would be subject to a 12-year occupancy clause.” There should be no increase in areas defined as 'Rural Areas Under Significant Urban Influence'. The submission states that Asdee (village and rural townlands) is classed as being ‘under urban influence’ and requests deletion of points listed in KCDP 5-13 and replacement with housing guidelines that foster a living countryside in line with the 2016 EU declaration and having to live in the area for seven years prior to applying for planning permission is discriminatory and highly objectionable. It further states that many people – not just farmers – have economic and social needs to live in the countryside, and their needs and rights must be respected and facilitated, as well as those who are not from the area.	See response to the OPR Submission. Objective KCDP 5-12 allows for various categories of applicant in this rural area type. 5-12 c) would be rural based employment, with the location of this employment in the rural area that they would be applying for permission in. These areas are in close proximity to settlements or are areas with a high existing level of development, opportunities therefore exist in terms of home ownership without having to include additional categories of employment under this objective. See response to the recommendation on the rural area types map in the OPR submission. Policy in respect to rural housing has been drafted in accordance with the 2005 ministerial guidelines sustainable rural housing and seeks to accommodate those who have a genuine Economic or Social need to live in the rural area while encouraging the regeneration and re-population of the county’s town and small villages.in addition rural are types were designated following a detailed analysis of the counties Rural areas which included (amongst other data) population, housing density commuting patterns and

		recent house construction. This evidence approach is considered reasonable.
KE-C1-396 Bernie O Donoghue	This submission relates to a specific planning application and states that people should be allowed to build a new, energy efficient house on their own land even if they already have a house.	This submission relates to a specific application and therefore is not a matter for the CDP. Policy in relation to rural housing is outlined in chapter 5. This policy does not facilitate people who already have a house in the rural area to be favourably considered for a second house, this is considered reasonable
KE-C1-119 Lyreacrompane Community Development	<p>The submission states that the community development group work closely with the local national school and have observed a decline in pupil numbers which they correlate to a lack of housing availability and restricted granting of planning permission. The submission seeks the support of Kerry County Council in providing housing for the area in order to attract families and future residents, to guarantee its existence for generations to come.</p> <p>The submission states that there are several recreational facilities in Lyreacrompane which would be of benefit to new housing development, such as a riverwalk, mountain and bog walks, playground, outdoor adult exercise space, community field, walking track for daytime and night time, basketball and tennis courts.</p>	Lyreacrompane is designated as a small village settlement in the settlement hierarchy and identified as a location where a cluster type development as detailed by the policies contained in Section 5.4 would be considered. In addition significant areas in the Lyreacrompane are designated as other rural areas, objectives 5.14 gives favourable consideration to permanent places or residence in these areas as they arise subject to other normal planning criteria.
KE-C1-134 John Fox	The submission states that the Local Authority must have a strategy for development and growth of Villages and small settlements so that they are attractive to live & work in which will reduce rural decline, isolation and result in a better quality of life for all the residents, and also attract people to renovate vacant and derelict building.	<p>The draft county development plan contains various policies and objectives that support the growth of villages and small settlements throughout the county.</p> <p>Chapter 4 Towns & Villages in particular outlines a range of policies and objectives that seek to sustain and augment the counties small villages and consequently rural areas.</p>
KE-C1-337 Rosalie Scanlon	The submission welcomes recognition of agriculture and the importance of promoting farm diversification and new employment opportunities within our rural communities. The submission also states that as 53% of farm families nationally rely on off farm income objective 5-12 and 5-13 should delete reference to “full time farmers”	Objectives 5-12 a) and 5-13 a) do not restrict individuals who may be favoured considerable for a dwelling in the rural area to full time farmers. There are a number of additional categories of individuals who can be favourably considered in the rural area under these areas
KE-C1-80 Kerry IFA	<p>The submission makes the following observations.</p> <p>Rural Housing and Dwelling.</p> <ul style="list-style-type: none"> -Opposed to increase in development charges for rural dwellers, -Requests that anyone who builds or buys a house in the rural area abide by rural lifestyles and do not impede farming practices.; <p>Planning Permission along National Roads;</p>	<p>Development charges are covered by the Development Contributions Scheme 2017 and are not a matter for the CDP.</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</p>

	<p>-The IFA raises concern over planning applications that adjoin Roads with speed limits of 60km/h and greater that get referred to Transport Infrastructure Ireland and that they recommend refusal on such planning applications. Kerry IFA request that Kerry County Council assist applicants as applicable in informing them of all necessary planning requirements and grant planning permission if they satisfy all other necessary planning requirements.</p> <p>The submission further comments that Kerry IFA reject the NRA, or any other authority, effectively sterilizing land for one-off house development for farm families in the County.</p> <p>Scenic Routes Planning Permission; Kerry IFA seeks the assistance of Kerry County Council in the granting of planning permission for the development of housing or other farm developments along scenic routes.</p> <p>“Locals only” Planning Permission Kerry IFA wishes to ensure that there is no prohibition to the granting of planning permission to those from outside a particular area from securing the granting of planning permission to provide housing for their family.</p>	<p>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 kmh apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.</p> <p>Policies in relation to landscape and scenic routes are contained in Chapter 11 of the Draft Development Plan. It is a stated objective in this chapter to protect the landscapes of the County by ensuring that any new developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of their area. The planning department provide a comprehensive pre-planning service where assistance and advice in relation to any proposed application in a scenic route/area is provided</p> <p>Objectives 5-12 to 5-14 cover the circumstances in which applicants in the rural area will be considered in terms of rural settlement policy.</p> <p>Policy in respect to rural housing has been drafted in accordance with the 2005 ministerial guidelines sustainable rural housing and seeks to accommodate those who have a genuine Economic or Social need to live in the rural area while encouraging the regeneration and re-population of the county’s town and small villages.in addition rural are types were designated following a detailed analysis of the counties Rural areas which included (amongst other data) population, housing density commuting patterns and recent house construction. This evidence approach is considered reasonable.</p>
<p>KE-C1-346 Kerry Green Party</p>	<p>The submission seeks the inclusion of an additional objective in Section 5.5.2, which states, “In rural areas under urban influence, and particularly in Gaeltacht areas, priority and weighting should be given to those actively involved in local cultural activities (music and creative arts) as well as with fluency or demonstrable interest in the Irish language.” The submissions rationale for this is that a shared culture is often a key aspect of thriving communities, and those actively engaging in cultural activities, including use of the Irish language, should be supported in entering into and becoming a part of rural communities under urban influence.</p>	<p>Objectives 5-12 to 5-14 cover the circumstances in which applicants in the rural area will be considered in terms of rural settlement policy.</p> <p>Rural area types have been designated in accordance with the methodology set out in the Draft Plan.</p> <p>In addition, policies in relation to rural housing cannot positively discriminate in favour of individuals who are involved in cultural activities.</p>

<p>KE-C1-297 Dingle Peninsula Tourism Alliance</p>	<p>The submission requests consideration be given to families of local farmers and landowners in much desired areas such as the Dingle Peninsula as new housing is urgently needed for local indigenous people. Proposed planning rules are far too restrictive on local applicants who are not employed on farming related work or are not landowners. Persons especially young people who have a site or a site on a family holding but working or living off farm seem to be excluded from obtaining permission to build and live in a rural area. Dingle Peninsula Tourism Alliance does not support the building of homes in rural areas for subsequent sale on the open market. However, it is very supportive of local rural people or persons from the area but who have left to get work not available in the Dingle area. We note that there is no rural general zone in the new draft plan and that all these areas are covered by the designation Rural Areas Under Urban Influence covering a very large part of our County.</p>	<p>Objectives 5-12 to 5-14 cover the circumstances in which applicants in the rural area will be considered in terms of rural settlement policy.</p> <p>Rural area types have been designated in accordance with the methodology set out in the Draft Plan.</p> <p>The rural general designation, which refers to landscape, still exists in the Draft Development Plan, see Section 11.6.3.2.</p>
<p>Recommendations See response to OPR submission.</p>		

<p>Chapter 5 – Rural Housing - Holiday / Second Homes and Renovation and Restoration of Existing and Vacant Buildings Situated in Rural Areas</p>		
	<p>Submission Summaries</p>	<p>CE Response and Recommendations</p>
<p>KE-C1-346 Kerry Green Party</p>	<p>The submission strongly supports the reinvigoration of rural towns and hubs and seeks the inclusion of an additional objective in Section 5.7 which states “Disincentivise the possession of second homes, even in towns, by requiring long-term residency and connection to locality through work and/or culture in all instances. The building of second homes or holiday homes should not be permitted unless year-round occupation (through letting or shared residency) is demonstrated”. The submissions rationale for this is that given the limited supply and unaffordability of housing to working young people, there should be a strong commitment to disincentivise second homes.</p>	<p>The large scale disincentivising of second homes in all areas is a matter outside of the remit of the CDP. However, objective 5-21 prohibits holiday/second homes in the rural area.</p> <p>It is recommended to amend objective KCDP 5-9 to restrict dwellings in cluster developments to permanent places of residence.</p>
<p>KE-C1-165 Kate Carmody</p>	<p>-5.8 Renovation and restoration of existing buildings should be a priority in all areas, as part of the circular economy. Buildings that come to mind are Doon church, old mill in Ballylongford and Coolbeha Villa. The lack of enforcement on these properties constitutes dereliction of public sector duty.</p> <p>-The following provision should be removed: - ‘The structure to be restored/renovated shall constitute an identifiable dwelling with the walls and roof intact.</p>	<p>It is an objective county development to support and encourage the regeneration and re-use of our derelict and vacant buildings throughout the county in terms of proper planning and sustainable development , an example of re-use of vacant property is the recently granted planning application for Doon church, Ballybunion.</p> <p>No change recommended</p>
<p>Recommendations Amend objective KCDP 5-9 to restrict dwellings in cluster developments to permanent places of residence.</p>		

Chapter 6 – Sustainable Communities

Chapter 6 – Sustainable Communities - Introduction & Sustainable Living		
	Submission Summaries	CE Response and Recommendations
<p>KE-C1-482 Transition Kerry</p> <p>KE-C1-410 Crainn Chiarraí</p>	<p>SUGGESTED Changes to the wording of objectives KCDP 6-3 Continue to support the creation of sustainable communities throughout the County by facilitating the creation of attractive neighbourhoods where there are strong links and connections to local services, community facilities and employment areas and where walking, cycling, and public transport is prioritised.</p> <p>THIS WILL INCLUDE THE PROTECTION OF EXISTING MATURE TREES AND HEDGE, PRIORITISING THE PLANTING NATIVE SPECIES IN GREEN AND PUBLIC AREAS AND INTEGRATING EXISTING ECOLOGICAL CORRIDORS AROUND AND BETWEEN COMMUNITIES IN ORDER FR BOTH WILDLIFE AND HUMANS TO MOVE AROUND SAFELY.</p> <p>KCDP 6-4 Facilitate and support community-based initiatives the promote awareness of LOCAL food production, the minimisation of food waste, LOCAL COMPOSTING SOLUTIONS and allied initiatives that encourage climate resilience and mitigate climate change.</p> <p>KCDP 6-13 Support the provision of a range of community infrastructure within clusters located in easily accessible areas.</p> <p>GIVE PRIORITY TO BIODIVERSITY AND NATURAL GREEN/BLUE SPACES IN THIS INFRASTRUCTURE, DUE TO THE CRITICAL ROLE THEY PLAY IN SUPPORTING MENTAL, PHYSICAL AND EMOTIONAL HEALTH IN COMMUNITIES.</p> <p>DEVELOP CONNECTIONS BETWEEN EXISTING URBAN 'BIODIVERSITY & CLIMATE RESILIENCE HOTSPOTS' SUCH AS TRALEE BAY WETLANDS AND LOCAL COMMUNITY ALLOTMENTS AND GARDENS AS PLACES OF WELLBEING AND HEALTHY COMMUNITIES.</p>	<p>While the proposed changes to the objectives have merit, some of the submissions are already covered in other areas of the plan, particularly in the environment chapter. In the context of this chapter the proposals if adopted would change the intent behind the objectives as they are written and in some cases be over-prescriptive to the point where they could provide a detrimental requirement and hinder developments unintentionally.</p> <p>Amend KCDP 6-3 to include the following additional text “and which supports the retention of existing ecological features and supports the planting of native species in green and public areas”</p> <p>Amend KCDP 6-4 to state: Facilitate and support community-based initiatives the promote awareness of LOCAL food production, the minimisation of food waste, LOCAL COMPOSTING SOLUTIONS and allied initiatives that encourage climate resilience and mitigate climate change.</p> <p>The concepts of Green & Blue infrastructure – Ecological Corridors is included in the Environment chapter 11.2.6, and in Objectives KCDP 11-18 to 11 – 22. It is not necessary to repeat in this section of the plan</p>
<p>KE-C1-358 Cllr. Breandán Fitzgerald</p> <p>KE-C1-57 HSE</p>	<p>These submissions state that 15% of all future housing developments should be single storey and designed for those with a disability or mobility issues.</p>	<p>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.</p>

<p>KE-C1-131 Tobar Dhuibhne - Plean Teanga Chiarraí Thiar</p>	<p>Chapter 6: no reference made to the language of the Gaeltacht community, to Irish or to the Gaeltacht in this chapter. The submission states that it is vitally important to acknowledge and recognise the different types of communities in the County.</p>	<p>Policies and objectives in relation to the Irish Language and Gaeltacht areas are contained in Chapter 8 “Gaeltacht Areas, Culture & Heritage”</p>
<p>KE-C1-80 Kerry IFA</p>	<p>The submissions make the following comments and observations; -Requests that the County Development Plan takes into account rural depopulation, rural isolation and reduced services in rural areas. -That all actions in the County Development Plan promote the development of rural communities both within and outside town and village boundaries and ensure those living and working in more isolated areas continue to receive the benefits associated with the development plan.</p>	<p>The county development plan in particular Chapter 4: Towns & Villages, Chapter 5: Rural Housing ,Chapter 6: Sustainable Communities, Chapter 7: Housing for All, Chapter 8: Gaeltacht Areas, Culture & Heritage provide direct objective and policy supports for rural areas across the spectrum of issues. In addition to the above chapters the county development plan as a whole is committed to promote the development of all rural communities in a sustainable fashion.</p>
<p>KE-C1-381 North Kerry Football Board</p>	<p>This submission requests that the Plan promotes the development of rural communities both within and outside town and village boundaries, including remote working, in order to increase the population of rural areas.</p>	<p>See the response to the previous submission. The County development plan as a land use planning framework 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.</p>
<p>KE-C1-375 Southern Region Waste Management Office</p>	<p>The submission states that the Circular Economy and its benefits should be referred to in this chapter, including special mention of the opportunities for social enterprises based on the Circular Economy.</p>	<p>There are already adequate multiple references and objectives to support the transition to the circular economy in chapter 9 Economic development, Chapter 2 Climate Change & Achieving a Sustainable Future and Chapter 13 Water & Waste Management to make additional references in other chapter would just lead to unnecessary repetition.</p>
<p>KE-C1-111 Mol Teic (t/a Dingle Hub)</p>	<p>That the Public Participation Network (PPN) should engage with other relevant bodies, such as the Connected Hubs, development agencies (NEWKD, SKDP) and non-governmental bodies (such as Transition Kerry and others) to assist the PPN in raising awareness and assisting communities to become climate resilient.</p>	<p>Comments are noted. The Council through the Public Participation Network (PPN) connect with community groups and stakeholders around the county. The Climate Action Team within the Council will work with all communities and relevant organisations in developing awareness and assisting communities to become climate resilient. See amendment to KCDP 6-9 below</p>
<p>KE-C1-127 Farranfore Development Association</p>	<p>The submission attached a document which reviewed the Farranfore development plan which sets out the goals and objectives of the Farranfore development plan and how they have achieved those objectives and further actions and consultations they may need to undertake to fully achieve their goals.</p>	<p>Farranfore is a settlement within the wider Killarney MD and it is more appropriate to deal with the issues raised in this submission when reviewing the Killarney municipal district plan.</p>

<p>KE-C1-346 Kerry Green Party</p>	<p>The submission seeks the inclusion of additional wording in Objective KCDP 6-9, which states “and climate and biodiversity action projects”, therefore the objective would read “Promote the delivery of social infrastructure, high-quality services, and climate and biodiversity action projects through collaboration with the Kerry Public Participation Network (PPN).” The submission reasons that as it stands the objective is not inclusive of the environmental aspect of PPN groups.</p>	<p>The submission is noted and will be amended as suggested.</p> <p>Amend Objective KCDP 6-9: Promote the delivery of social infrastructure, high-quality services, and climate and biodiversity action projects, at appropriate locations, through collaboration with the Kerry Public Participation Network (PPN).</p>
<p>KE-C1-346 Kerry Green Party</p>	<p>The submission seeks the inclusion of an additional Objective in Section 6.2.2, which would state “Promote the importance of clean air and water, and work to both monitor and reduce the level of air and water pollution in the county”. The submission outlines that there should be a policy objective around air quality in the ‘Healthy Communities’ section of Chapter 6 in addition to the environment chapter.</p>	<p>Chapter 11 outlines policy in relation to air quality, noise etc and Chapter 13 details policy relating to water. It is not considered necessary to repeat existing objectives that relate to a specific topic in each and every chapter. Objectives are not mutually exclusive, rather the CDP should be read as a complete, integrated document. The objectives in Chapter 11, Section 11.3 seek to protect air quality for health and wellbeing with a commitment already in place for the LA to work with stakeholders towards improving air quality and monitoring as required under relevant legislation. As regards transparency it should be noted that all air quality and water quality data is already publicly available through the EPA’s website (including real-time data for air quality) and via annual reports that are publicly available.</p>
<p>KE-C1-346 Kerry Green Party</p>	<p>The submission seeks the inclusion of an additional Objective in Section 6.3, which would state “Encourage and support the use of vacant, unused or infrequently used buildings by communities, e.g., closed schools, churches, GAA halls, while working transparently with all stakeholders involved.” The submissions states that this is part of implementing a circle economy and should include working with stakeholders to make available unused or infrequently used buildings for communities.</p>	<p>Chapters 2 through to 5 already strongly encourage the re-use of existing building stock. The plan strongly supports the use of infill brownfield sites; the consolidation of our urban cores and the re-use of existing building stock is acknowledged in climate policy re-embedded carbon. As noted in the submission the re-use of building stock in line with the circular economy is further supported in Chapter 13.</p> <p>It is proposed to include the following additional objective “Support the provision of Multi-Use Community Facilities which encourage sharing amongst community groups and are designed for multi-use activities and future sharing.”</p>
<p>KE-C1-346 Kerry Green Party</p>	<p>The submission seeks the inclusion of an additional Objective in Section 6.3, which would state “Promote Sláintcare’s SH24 service to encourage non-symptomatic Kerry citizens, particularly young people, to avail of the service’s free sexual health tests.” As there is currently limited awareness in Kerry of the SH24 service, which provides a free self-administered testing service for sexually transmitted infections.</p>	<p>The County Development plan is a high-level land use planning framework, it is not the role of the county development plan as high-level planning related document to include such highly specific objectives that fall outside of planning context of the document.</p>
<p>KE-C1-346 Kerry Green Party</p>	<p>The submission seeks the inclusion of an additional Objective in Section 6.3.4, relating to the non-closure of small schools.</p>	<p>The County Development plan is a high-level land use planning framework, it is not the role of the county development plan as high-level planning related document to deal with such an issue that falls under the remit of the department of education as regards school closures and the provision of educational facilities.</p>

<p>KE-C1-346 Kerry Green Party</p>	<p>The submission seeks the inclusion of an additional Objective in Section 6.3.5, which would state “In order to advance the interests of young people living in Kerry, who often do not have a voice in planning and development decisions within the County, and in order to ensure that the development in the county will not result in younger generations having to bear the burden of unsustainable development, Kerry County Council will ensure that young people have a platform to participate in the development of the county, for example through a Kerry Youth Forum facilitated by the council or through enhanced outreach to young people in consultations on significant development projects in the county” as the Plan does not include the voice of young people. The submission further states that Volume One, only contains the words ‘young’ and ‘youth’ 20 times.</p>	<p>While not explicitly referred to public consultation in any plan is open to all members of society regardless of age. The Council acknowledges that there is a need for continued collaboration with the wider communities and with all agencies and stakeholders to deliver on the plans and projects.</p>
<p>KE-C1-111 Mol Teic (t/a Dingle Hub)</p>	<p>It is recommended that the Development Plan should contain a specific reference to the role and the potential of the Kerry Education and Training Board’s National Centre for Outdoor Education and Training (which is also the Killorglin Campus of Kerry College).</p>	<p>The County development plan is a high-level land use planning framework. The county development plan provides for the support and facilitation of educational facilities at a county wide level without making specific reference to individual facilities.</p>
<p>KE-C1-111 Mol Teic (t/a Dingle Hub)</p>	<p>It is recommended that KCDP 6-20 should also include a reference to public transport.</p>	<p>The draft county development plan makes significant reference to public transport initiatives throughout the plan in particular chapter 14 Connectivity. The inclusion of a reference to public transport under objective KCDP 6-20 does not fit the overall aims of the objective to encourage the use of cycling and walking infrastructures in communities overall design and encourage greater physical activity by doing so.</p>

Recommendations

Amend KCDP 6-3 to include the following additional text; “and which supports the retention of existing ecological features and supports the planting of native species in green and public areas”

Amend KCDP 6-4 to state: Facilitate and support community-based initiatives the promote awareness of LOCAL food production, the minimisation of food waste, LOCAL COMPOSTING SOLUTIONS and allied initiatives that encourage climate resilience and mitigate climate change.

Amend Objective KCDP 6-9: Promote the delivery of social infrastructure, high-quality services, and climate and biodiversity action projects, at appropriate locations, through collaboration with the Kerry Public Participation Network (PPN).

It is proposed to include the following additional objective: “Support the provision of Multi-Use Community Facilities which encourage sharing amongst community groups and are designed for multi-use activities and future sharing.”

	<p>Chapter 6 – Sustainable Communities - Community Infrastructure, Services and Facilities</p>	
	<p>Submission Summaries</p>	<p>CE Response and Recommendations</p>
<p>KE-C1-71 MJ Kearney</p>	<p>The submission seeks increased local funding opportunities including the Community Support Fund. Enhance the town through increased street cleaning, monitoring of litter</p>	<p>The allocation of funding is not within the remit of the review of the CDP, but is considered as part of the budgetary process each year.</p>

	and dog fouling, the provision of outdoor seating areas, footpath improvements, increased enforcement of temporary signage, provide a taxi rank and increase loading bay capacity and review traffic management and the provision of parking in the town.	The detailed issues set out in the submission are better dealt within the context of the Killarney Municipal District Local Area Plan 2018-2024 is up for review.
KE-C1-89 mary mahony	The submission seeks traffic calming measures at a particular location.	It is an objective of the plan (KCDP 14-34) to provide a safe road system throughout the County through Road Safety Schemes and to encourage the promotion of road safety in the County. It is the practice of the council to install traffic calming measures where they are deemed necessary. The CDP does not outline the location of individual ramps.
KE-C1-319 Social Action Group Rathmore	The submission states that the plan should show a stronger commitment to support a diverse evening/nightlife that is suitable for all ages including youth [safe and alcohol free]. This could also link to a rural transport programme to provide safe transport to evening/night facilities. The submission further states that the plan does not adequately separate the needs of children and youth under Objective KCDP 6-47. The submission welcomes section KCDP 6.2.7 and related objectives.	The submission is welcome, and the following text and objectives will be included in the Plan. Additional Text: The Council will encourage and facilitate with key stakeholders and community groups diverse evening/nightlife activities that are suitable for all ages including young people. New Objective: Encourage the development of diverse evening/nightlife activities that focus on youth participation and facilities

<p>KE-C1-62 Seamus Fleming</p>	<p>There is a deficit of focus on Youth in the Draft CDP. There should be more facilities provided for young people to meet up and have a space for entertainment, arts/drama and music etc.</p>	<p>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.</p> <p>The following additional text will be included in Section 6.3.5: The Council recognises the role of Comhairle Na nÓg, and the Department of Children and Youth Affairs (DCYA), in giving children and young people the opportunity to be involved in the development of local services and policies. It is recognised that a multi-agency approach is necessary in meeting the needs of the youth within the county. Such needs include recreational opportunities, including both formal and informal activities i.e. ‘youth cafes’, sports facilities and casual areas where young people can engage with each other.</p> <p>An additional Objective will be included: Engage with Comhairle Na nÓg and other youth organisations in relation to identifying the needs of children and young people</p> <p>The following text will be added to the plan: The Council recognises the need to maximise opportunities for play facilities for children both within the natural and built environment. The Kerry Play & Leisure Policy will be revised in 2022 and the County Development Plan will support the implementation of same.</p> <p>An additional Objective will be included: Finalise the Kerry Play & Leisure Policy and support its implementation throughout the period of the Plan</p>
<p>KE-C1-385 Cllr Jackie Healy- Rae</p>	<p>The submission requests that elderly/vulnerable accommodation in the form of 1-2 bedroom houses would be built in a community form, for example like Tobar Naofa, Tralee and Taobh Linn, Kenmare with all the ancillary services available to them.</p>	<p>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”.</p>

<p>KE-C1-398 Irene Hartigan</p>	<p>The submission states the importance of community collective efforts and that fundamental principles are required so members of the community take responsibility for their environment. The submission seeks the implementation of a community police force, a pedestrian crossings, improved street lighting, traffic and parking, litter bins, play spaces in Killarney.</p>	<p>The submission is quite extensive in terms of content and covers a wide range of community infrastructure, roads infrastructure, public lighting and protection of the environment. The submission details specific areas in Killarney which can be dealt with at Municipal District Level. The overall aims of the submission are supported by existing policies and objectives in the County Development Plan in this section, Connectivity, Towns & Villages, Tourism & Outdoor Recreation and Environment.</p> <p>In summary the County development plan provides throughout the plan extensive support for the provision sustainable travel and improvements to all forms of public infrastructure.</p> <p>It is not within the remit of the county development plan to explicitly provide any of the improvements to public infrastructure or the setting up of community organizations but to provide the policy framework and objectives to support such improvements.</p>
<p>KE-C1-147 Tarbert Development Association</p>	<p>As the rural population is an aging one and most people wish to continue to live at home, anything that would allow this to happen should be supported.</p> <p>Loneliness is an issue for older people living alone, we believe a small development consisting of 5 or more houses should be developed in every town/village which would allow these people to live independently but within a short distance from services. This type of facility would be a major advantage to the plight of the elderly.</p>	<p>The County development plan recognises that Kerry has an ageing population and is likely that the population over 80 will quadruple by 2040. As people get older, they are likely to have increasingly complex healthcare needs, with a requirement for services and facilities to support provision of suitable and necessary care.</p> <p>It is the policy of KCC to support older people to live with dignity and independence in their own homes and communities for as long as possible.</p> <p>The development plan supports the provision for housing options for older people as set out in the form of objective such as KCDP 7-15, KCDP 7-16 KCDP 7-17 KCDP 7-18 of chapter 7 Housing for all. Developments will be undertaken in accordance with identified need.</p>
<p>Recommendations</p> <p>Include the following additional text in Section 6.3.5: The Council will encourage and facilitate with key stakeholders and community groups diverse evening/nightlife activities that are suitable for all ages including young people.</p> <p>New Objective: Encourage the development of diverse evening/nightlife activities that focus on youth participation and facilities</p>		

The following additional text will be included in Section 6.3.5 - The Council recognises the role of Comhairle Na nÓg, and the Department of Children and Youth Affairs (DCYA), in giving children and young people the opportunity to be involved in the development of local services and policies. It is recognised that a multi-agency approach is necessary in meeting the needs of the youth within the county. Such needs include recreational opportunities, including both formal and informal activities i.e. ‘youth cafes’, sports facilities and casual areas where young people can engage with each other.

An additional Objective will be included; Engage with Comhairle Na nÓg and other youth organisations in relation to identifying the needs of children and young people

The following text will be added to the plan; The Council recognises the need to maximise opportunities for play facilities for children both within the natural and built environment. The Kerry Play & Leisure Policy will be revised in 2022 and the County Development Plan will support the implementation of same.

An additional Objective will be included; Finalise the Kerry Play & Leisure Policy and support its implementation throughout the period of the Plan.

Chapter 7 – Housing for All

Chapter 7 – Housing for All - The Housing Strategy and the Housing Need Demand Assessment (HNDA), Housing Policies, Homelessness, Housing Options for Older People and Address Vacancy in Housing.	
Submission Summaries	CE Response and Recommendations
<p>KE-C1-71 MJ Kearney</p> <p>Ensuring the development of enabling housing infrastructure to meet the needs of Castleisland’s planned population growth including a mix of accommodation sizes and a balance between social and private housing.</p> <p>The focus now must be to further enhance Castleisland's capacity and capabilities to cater for an increasing ageing population,</p> <ul style="list-style-type: none"> • Create a further capacity increase in Nursing Home facilities • Development of Community Hubs for the Elderly within the Town Environs 	<p>The Draft Plan recognizes the need for a diverse range of accommodation options. Chapter 7 Housing for All contains a number of objectives which relate to accommodation provision including KCDP 7-1 which includes for a range of accommodation types for members of the traveller community, the homeless, people with disabilities and ethnic minority groups.</p> <p>The Draft County Development plan provides a housing allocation and population figure for the projected growth of Castleisland over the life time of the plan. There is a satisfactory quantum of zoned residential land that will allow for the achieving of those allocations at suitable density subject to any planning application being granted.</p>
<p>KE-C1-345 Robert O'Connor</p> <p>This submission states expresses concern that there may be inadvertent expressions of structural ageism (Palmore, 1990) visible in the current draft plan and that an ageism impact assessment conducted on the objectives and guidelines within the draft plan.</p>	<p>The Council is committed to the ‘Age Friendly Ireland’ Initiative and the current Kerry Age Friendly County Strategy 2018-2022 while supporting the Smart Ageing and National Positive Ageing policies and An Garda Síochána Older People Strategy (2010) to ensure that housing, transport/accessibility, etc meet the needs and opportunities of an ageing population. Section 7.6 of the plan deals with Housing Options for Older People. It is an aim of the plan to meet the housing needs</p>

		<p>identified in the Housing Needs Demand Assessment and Housing Strategy. The housing needs of this sector of the population are considered hereunder, focusing on the policies included in Housing for All.</p> <p>The plan recognises that the ageing population have specific housing needs relating to access, care, security, personal safety and proximity to community facilities. It is the policy of KCC to support older people to live with dignity and independence in their own homes and communities.</p>
<p>KE-C1-358 Cllr. Breandán Fitzgerald</p>	<p>The submission states that given the high level of single individuals on the social housing list that more housing units need to be provided for this cohort.</p>	<p>Kerry County Council is conscious of the changing demands for social housing in Kerry and across the country. The planned rural housing programme is being designed to meet the identified needs which have significantly changed to a need for 1 and 2 bed units.</p> <p>The content of the submission is not within the remit of the CDP but depends on National Policy.</p>
<p>KE-C1-363 NEWKD</p>	<p>This submission seeks the inclusion of additional wording "and by simplifying regulations for the rental investor" to the end of Objective KCDP 7-1.</p>	<p>KCDP 7-1 is in reference to the; "Preparation of a housing delivery action plan in accordance with housing for all".</p> <p>The wording as proposed by the submitter would not be enforceable as part of any objective as it is not within the remit of the county development plan to change the regulations regarding development for rental properties which are national statutory regulations.</p>
<p>KE-C1-380 MARTIN MULVIHILL</p>	<p>The submission requests that Kerry County Council update the draft Plan to make provision and opportunity for the implementation of the policy objectives from Chapter 7 as a matter of urgency when Local Area Plans fall short in meeting these objectives and updating LAPs as necessary.</p>	<p>The Draft County development plan once adopted becomes a statutory document and the policies and objectives contained within come into force and are applicable county wide unless specified otherwise, Once the county development plan is adopted and in force then a process of reviewing of the relevant Local Area plans will begin at an appropriate time.</p>
<p>KE-C1-385 Cllr Jackie Healy- Rae</p>	<p>The submission requests that Kerry County Council would amalgamate the 1 & 2 bedroom housing lists.</p>	<p>The allocation of housing and the management of the housing list is Not within the remit of the county development plan.</p>
<p>KE-C1-385 Cllr Jackie Healy- Rae</p>	<p>The submission states that demountable units should be used more regularly where it is deemed acceptable by the tenant.</p>	<p>The allocation of housing and the management of the housing list is Not within the remit of the county development plan.</p> <p>However objective KCDP 7-1 seeks to prepare a housing Delivery Action Plan in accordance with Housing for All and deliver on the actions outlined therein over the lifetime of the Plan. This will supply adequate levels of social and affordable housing to ensure all sectors of society</p>

		have access to housing including a range of accommodation types for all members of society.
KE-C1-127 Farranfore Development Association	The submission states: As Farranfore was not overly developed with housing in the past decade the village has retained its integrity and character, which should allow residential development that does not exclude access to those without regular motorised transport and should promote socially inclusive and age friendly accessibility in the village.	The county development plan provides for a housing allocation for Farranfore that is adequate to the scale of the settlement. Housing applications are assessed on their individual merits and compliance with all statutory guidance and requirements as well as to whether or not the application satisfies site specific constraints.
KE-C1-385 Cllr Jackie Healy- Rae	The submission states that it should be an objective of this plan to provide Homeless Accommodation in each electoral area.	It is not within the remit of the county development plan to provide homeless accommodations in any form. The County development plan as a land use planning framework does however provide support for the provision of Homeless accommodation in the form of objectives such as KCDP 7-12 in chapter 7 Housing for all. As it states in KCDP 7-12 the county development plan supports the implementation of the homelessness strategy that is currently being developed for the county.
KE-C1-358 Cllr. Breandán Fitzgerald KE-C1-513 Mikey Sheehy	The submission states that more Sheltered Independent Living housing needs to be provided to cater for older population. Support the development of assisted living developments close to town centres.	The County Development Plan support the submission. Objective KCDP 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.
KE-C1-513 Mikey Sheehy KE-C1-79 Michael Quilter	Support the completion of any remaining ghost estates and unfinished housing estates in the county, including those now outside planning/town boundaries.	Volume 6 , Section 1.5.4.15 of the development management guidelines states the following; “Unfinished Estates Emphasis will continue to be placed on successfully completing and consolidating these estates in line with any in place Site Resolution Plans. Appropriate density controls, phasing and high design standards will be required in all settlements for future residential developments” The plan provides support for the facilitation of the completion of unfinished housing estates. Recommendation: Include a new objective Support the completion and consolidation of unfinished estates where services have been satisfactorily completed..
Recommendations Include a new objective Support the completion and consolidation of unfinished estates where services have been satisfactorily completed.		

Chapter 8 – Gaeltacht Areas, Culture & Heritage -Gaeltacht Areas		
	Submission Summaries	CE Response and Recommendations
KE-C1-131 Tobar Dhuibhne - Plean Teanga Chiarraí Thiar	<p>Language Plan</p> <p>This submission refers to the Language Plan for West Kerry: Tobar Dhuibhne, Plean Teanga Chiarraí Thiar (2018 - 2025). The language plan was given a statutory basis under Acht na Gaeltachta 2012. The submission outlines the primary aim of this plan is to increase the number and concentration of Irish speakers both in the home and in the community in Gaeltacht Chorca Dhuibhne. It is suggested that KCDP 8-6 be amended to include the following text:</p> <p><i>Éascú agus tacú le Pleananna Teanga an Chontae: Tobar Dhuibhne - Plean Teanga Chiarraí Thiar (2018), Dúchas an Daingin - Plean Teanga do Bhaile Seirbhíse Gaeltachta Daingean Uí Chúis agus Brí Uíbh Ráthaigh - Plean Teanga Chiarraí Theas (2019), go háirithe leis an sprioc atá acu líon na gcainteoirí laethúla Gaelainne a ardú go fadtéarmach sna Ceantair Ghaeltachta."</i></p> <p>Facilitate and support Language Plans of the County: Tobar Dhuibhne - Plean Teanga Chiarraí Thiar (2018), Dúchas an Daingin - Plean Teanga for Bhaile Seirbhíse Gaeltachta Daingean Uí Chúis and Brí Uíbh Ráthaigh - Plean Teanga Chiarraí Theas (2019), to achieve their target of increasing the number of daily Irish Speakers, long term in Gaeltacht areas.</p> <p>Decline in the number of Daily Irish Speakers</p> <p>With reference to section 8.1 of the draft plan, the submission makes reference to the sentence that states that the population of the Gaeltacht has increased. The submission recommends however that recognition should be given to the fact that the number of daily Irish speakers has fallen and that this is a serious issue in terms of the survival of the language and a significant challenge to the Gaeltacht community, to language planning and to Kerry County Council.</p> <p>Planning Officer</p> <p>The submission questions whether a language condition could be attached to the position of planning officer with respect to working in the Gaeltacht.</p>	<p>Language Plan - Response</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. Amend KCDP 8-6 as follows:</p> <p><i>Éascú agus tacú le Pleananna Teanga an Chontae: Tobar Dhuibhne - Plean Teanga Chiarraí Thiar (2018), Dúchas an Daingin - Plean Teanga do Bhaile Seirbhíse Gaeltachta Daingean Uí Chúis agus Brí Uíbh Ráthaigh - Plean Teanga Chiarraí Theas (2019), go háirithe leis an sprioc atá acu líon na gcainteoirí laethúla Gaelainne a ardú go fadtéarmach sna Ceantair Ghaeltachta."</i></p> <p>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 Uíbh Ráthaigh - Plean Teanga Chiarraí Theas (2019) language plans, to achieve their target of increasing the number of daily Irish Speakers, long term in Gaeltacht areas.</p> <p>Number of Daily of Irish Speakers</p> <p>Table 8.1 outlines the decline in daily Irish Speakers from 2011 to 2016</p> <p>Planning Officer</p> <p>Staff of the planning department are deployed across a number of boundaries/Municipal Districts including area's consisting of Gealtacht and Non-Gaeltacht areas. the council facilitates pre-planning discussions and any other interaction with planning staff where required through Irish.</p> <p>Settlement Issue</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</p>
KE-C1-355 Dúchas an Daingin	<p>Irish Language and Gaeltacht –</p> <p>The submission refers to the various language plans in operation in the County. The submission states that there is no mention of Irish or the Gaeltacht in the</p>	

<p>KE-C1-393 Brí Uíbh Ráthaigh - Plean Teanga Chiarraí Theas, ceanneagraíocht - Comhchoiste Ghaeltacht Uíbh Ráthaigh,</p>	<p>rural housing chapter. It is stated that the language is of relevance to every aspect of life and not just to the Gaeltacht chapter. Therefore, references should be made in other chapters of the draft Plan (such as the Rural Housing Chapter) and specific policies set out so that every effort can be made to protect the language, to preserve it and to promote it as the daily community language. The importance of acknowledging and recognising the different types of communities in the County is highlighted and it is stated in the submission that the Gaeltacht and the Irish language are central to any conservation about sustainable communities. It is stated that people need to be supported to reside permanently in the Gaeltacht, it is stated that this will ensure sustainable communities.</p> <p>With respect to chapter 4, Towns and Villages again it is highlighted that no reference is made to Irish or the Gaeltacht. It highlights that there are language plans operating for South Kerry, West Kerry, Dingle, one has been prepared for Tralee and one is currently under preparation for Cahersiveen. It is stated that it is important that the advancement of the language and the Gaeltacht is taken into account when the future of towns and villages are being discussed. The submission also states that it is important that KCC has strong policies in respect to Irish and the Gaeltacht so that it remains alive in Kerry for the next generation.</p> <p>It is stated that greater emphasis should be placed on the use of Irish as the everyday language of the Gaeltacht. The following suggested amendment is made to Objective KCDP 8-6:</p> <p>KCDP 8-6 Facilitate and support Tobar Dhuibhne, Language Plan for West Kerry, Dúchas an Daingin – Language Plan for Bhaile Seirbhíse Gaeltachta Dhaingean Uí Chúis and Brí Uíbh Ráthaigh – Language Plan for South Kerry, to achieve their aims of increasing the number of daily Irish speakers.</p> <p>Language Plan</p> <p>The submission highlights that there is a significant amount of language planning taking place in Kerry for the states two Gaeltacht areas and 3 Gaeltacht service towns in Kerry in the County. The aim of language planning is to preserve and to promote Irish as the community language.</p> <p>The submission states that Brí Uíbh Ráthaigh –Plean Teanga Chiarraí Theas 2019 is not referred to on page 117 of the Draft Plan (where reference is made to the Council supporting other language plans). The Plean Teanga Chiarraí Theas is only referred to once in the Plan and the year is incorrect, it should be 2019. It is stated that Meitheal Idiráisínteachta Gaeltacht Uíbh Ráthaigh (2019)” is</p>	<p>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> <ol style="list-style-type: none"> Farmers, including their sons and daughters or a favoured niece/nephew. Persons who have spent a substantial period of their lives (i.e., over seven years), living in the local rural area. <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>Development to be of benefit to the Irish language</p> <p>The preservation and fostering of the Irish Language is a primary objective of Kerry County Council. It is acknowledged that the Council’s commitment to the language must be underpinned by development in the Gaeltacht and that practical measures are urgently needed to strengthen the economic and social fabric of Gaeltacht communities. It is acknowledged that at times it has been difficult to achieve a balance between supporting different forms of employment/tourism generation development in the Gaeltacht and at the same time protecting the unique cultural tradition of the language by ensuring that development that is permitted is of the benefit of the Irish Language and the Gaeltacht. This plan endeavours to ensure that development that is permitted will be of the benefit to the language.</p>
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mentioned three times in the Plan despite that they are the main group dealing with language planning issues in South Kerry under the Act na Gaeltachta 2012.

Living Community Language

The statement under section 8.1.3. 1 Chapter 8 of the Draft Plan, relating to retaining the proportion of active integrated Irish Speakers above 67% is highlighted as being incorrect ('...it is of critical importance to maintain the proportion of active integrated Irish speakers above 67% and ensuring that the proportion of young people speaking Irish is increased.') It is stated in the submission that the definition of a community language means that over 67% of the people of the area speak the language daily, (this percentage is needed to keep it to the forefront of the community.) It is stated that in Cenus 2016 there were only 6.9% of daily Irish speakers in Uibh Ráthaigh and 28.7% in Corca Dhuibhne. The submission highlights that there is only one electoral division where the % is over 67% and this is Dún Chaoin at 71%. Therefore, it is stated that the word 'retain' should be removed and the following amendment be made to the statement:

"is beart criticiúil tábhachtach é an líon cainteoirí slánaithe a **bheith** os cionn 67% **chun go mbeadh an Ghaeilge ina teanga phobail** agus **tá sé mar pholasáí ag Comhairle Contae Chiarraí gníomhú go práinneach i dtreo an céatadán seo a bhaint amach i gceantracha Gaeltachta an Chontae**".

Requested to amend KCDP 8-11 as follows: **Gníomhú go práinneach leis an aidhm an Ghaeilge a neartú sa Ghaeltacht mar theanga a úsáideann os cionn 67% den daonra go laethúil i lasmuigh den chóras oideachais trí fiontar/fostaíocht a chothú i gcomhar le hÚdarás na Gaeltachta agus páirtithe leasmhara eile leasmhara – pleananna teanga na Gaeltachta, na comharchumainn Gaeltachta agus Tascfhórsa Uíbh Ráthaigh – chun go mbeadh méadú ar líon na bpostanna sa Ghaeltacht agus go bhfuil an Ghaeilge mar theanga an láthair oibre in ar a laghad 33% de líon na bpostanna sa Ghaeltacht.**

Act urgently to achieve the aim of strengthening Irish as the language that over 67% of the population use daily outside of the education system, through the fostering of employment and enterprise in co-operation with Údarás na Gaeltachta and other stakeholders-Gaeltacht Language Plans, Comharchumainn Gaeltachta and Tascfhórsa Uíbh Ráthaigh, to ensure that there is an increase in the number of jobs in the Gaeltacht and that Irish is the language of the workplace in at least 33% of the jobs in the Gaeltacht

The Council actively supports all statutory development agencies especially Údarás na Gaeltachta, to achieve sustainable development in the Kerry Gaeltacht areas while protecting and promoting the Irish Language as the first community language of the area.

It is acknowledged that the sustainability of Gaeltacht areas and Irish as a community language is dependent on people that are able and willing to speak Irish, living and actively participating in every aspect of the community in the Gaeltacht. Therefore, the Council have committed to preparing an integrated strategic language planning process for the Gaeltacht and Gaeltacht proofing all activities undertaken by state organisations (see section 8.1.3.1 of the Development Plan). This will be carried out within the timeframe of the Development Plan – 6 years. This plan will be prepared in consultation with relevant stakeholders working in the interest of the language, the Gaeltacht community itself and qualified experts in language planning.

Until as such a time as the strategic language planning process plan is in place, a number of amendments will be included into the Draft Plan on foot of the submission received. It is hoped these amendments assist in the preservation of the language and its promotion as the first community language.

Linguistic Impact Statement and Occupancy Clause– Response

It is agreed that a linguistic impact statement shall be required where two 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 objective 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.**

Economic Development

The submission states that despite the need to established jobs with Irish in the Gaeltacht, there is no mention of the Gaeltacht or Irish in the economic development Chapter. It is stated that it is critical that Irish speakers have the opportunity to use the language in their place of work, outside of an educational setting.

The submission states that while the Plan recognises the difficulty there is in trying to achieve a balance between language planning and developing the economy, (page 120 of the Plan) it does not outline however how to address this. Therefore the following amendment is recommended:

“Tá gá le geilleagar beomhar a sholáthraíonn ar a laghad 33% de líon na bpostanna a bhfuil an Ghaeilge mar theanga an láthair oibre ag baint leo chun deis a thabhairt don daonra dúchasach fanacht laistigh den Ghaeltacht agus an Ghaeilge a úsáid go laethúil lasmuigh den chóras oideachais.”

The following amendment is proposed to KDCP 8-11 in the submission:

KDCP 8-11 Gníomhú go práinneach leis an aidhm an Ghaeilge a neartú sa Ghaeltacht mar theanga a úsáideann os cionn 67% den daonra go laethúil í lasmuigh den chóras oideachais trí fiontar/fostaíocht a chothú i gcomhar le hÚdarás na Gaeltachta agus páirtithe leasmhara eile leasmhara – pleananna teanga na Gaeltachta, na comharchumainn Gaeltachta agus Tascfhórsa Uíbh Ráthaigh – chun go mbeadh méadú ar líon na bpostanna sa Ghaeltacht agus go bhfuil an Ghaeilge mar theanga an láthair oibre in ar a laghad 33% de líon na bpostanna sa Ghaeltacht.

Language of Development Plan

Overall the it is stated that they are very disappointed that Irish is not mentioned in the Development Plan aside from Chapter 8 (and brief reference in the introduction and in the tourism chapter)

The submission states that it is disappointed with the level of Irish used in the draft Plan. It is stated that it is hard to read as it sticks too rigidly with the english version, and that there are some basic grammer mistakes. These include

Amend KDCP 8-8 as follows 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.**

Naming of Housing Developments – Response

The Council has a clear policy towards bi-lingual signage in areas outside of the Gaeltacht .

Language Plans

In March 2021 Kerry County Council established an external independent three person Irish Language Advisory committee to advise the Council in identified areas. The Committees advices the Council generally in terms of the promotion and development of the language within the Local Authority. In particular, however, the committee advises the Council on the naming of Housing Estates both private and public in the Gaeltacht areas.

Language of Draft Development Plan- Response

It is agreed that the Development Plan should use the correct Irish terms and abbreviations for Limistéir Phleanála Teanga (LPT) and Bailte Seirbhísí Gaeltachta (BSG) in both versions of the County Plan.

Insert the following text under section 8.1.1.1 **‘new initiatives... the development of Limistéir Phleanála Teanga (LPT) (Language Planning Areas) and the development of Bailte Seirbhísí Gaeltachta (BSG) (Gaeltacht Service Towns).** The designation of **BSG** is a recognition ...resources.

Insert under section 8.1.3 the following new text: **‘Under the Gaeltacht Act 2012, Bailte Seirbhísí Gaeltachta (Gaeltacht Service Towns) Tralee, Dingle and Cahersiveen are defined as those towns situated in or adjacent to Limistéir Phleanála Teanga (LPT) Language Planning Areas and which have a significant role in providing public services, recreational, social, and commercial facilities for those areas. 26 Limistéir Phleanála Teanga (Language Planning Areas) have been recognised for the purposes of the Act.**

Insert under Section 8.1.4 the following text: **...implemented in 26 Limistéir Phleanála Teanga (language planning areas) and three Bailte Seirbhísí Gaeltachta Gaeltacht service towns by the end of 2025.**

Short Term lets – Response

The supply of housing for long-term rental or purchase by those wishing to live and work in the Gaeltacht area is acknowledged as a serious challenge impacting not alone on the people seeking accommodation but on the opportunities for those people to seek accommodation. It is the stated policy of the Local Authority outlined in section 10.3.5.3 of the Development Plan to maintain established and newly

<p>KE-C1-342 Conradh na Gaeilge</p>	<p>giving english abbreviations to Irish concepts such as Limistéir Phleanála Teanga (LPA in the Draft Plan) and Bailte Seirbhísí Gaeltachta (GST in the draft Plan). These should be LPT, and BSG. It is stated that these are well established abbreviations and it would be unusual to see them in any document nevermind in an Irish one. The submission recommends that a correct copy of the Draft Plan be prepared in Irish to demonstrate that the Council is serious about the Irish issue.</p> <p>Language Planning Officer The submission recommends that the Council commit to employing a language planning officer with relevant experience and expertise to ensure that language planning is of greater importance to the Council.</p> <p>The importance of the Development Plan in respect of the two Gaeltacht areas in Kerry is highlighted. It is stated that the implementation of the recommendations provided in their submission is necessary if the Council intends to achieve the Government aims as set out under Straitéis 20 bliana don Ghaeilge 2010-2030, that is preservation and promotion of the language in the Gaeltacht, preservation and protection of the heritage, culture and richness of the language of the Gaeltacht, in addition to strengthening the role of Irish in the home, place of work and community –all identified targets of the Council.</p> <p>The submission strongly states that there should be a linguistic basis to every aspect of the development plan that relates to the Gaeltacht.</p> <p>Settlement Issue The submission states that the Council is failing to protect the Gaeltacht and highlights the issue of planning in the context of housing in the Gaeltacht and states that this issue needs to be urgently addressed in the Plan. It is stated that positive exceptional actions should be taken to protect the Gaeltacht, the submission highlights the decline in daily Irish Speakers from 2011-2016, and that there is a generation of young people that cannot buy a site or house or obtain planning permission that are now being forced out of the Gaeltacht.</p>	<p>constructed residential areas as places of permanent residential occupation by owner/occupiers and/or long-term tenants. Objective KCDP 10-32 reinforces the Local Authority’s policy in terms of maintaining residential property for its intended use – residential: Prohibit the change of use of residential properties to short-term letting in established residential areas and newly constructed residential developments. The letting of a property on a short term basis is a material change of use of the property and requires planning permission. The Local Authority is using all of its functions available to it to try to address this problem. A dedicated enforcement officer has been engaged to identify all short term let properties across all platforms in certain towns in certain parts of the County, including Dingle town and surrounding area. This is being done in recognition of the significant impact the short term letting of properties is having on the housing market. A significant number of these properties require planning permission and will unlikely be granted permission given the lack of supply of properties for people to rent on a long term basis or to buy. Enforcement action will then be taken to ensure that these properties are removed from short term letting platforms.</p> <p>Linguistic Expert- Response Comment noted. The Council’s commitment to formulate an integrated strategic language planning process for the Gaeltacht and to Gaeltacht proofing all activities undertaken by state organisations, as set out on Section 8.1.3 of the Plan, should it is hoped (in addition to the other amendments proposed to the Draft Plan) assist in the preservation of the language and its promotion as the first community language.</p> <p>Irish Version of the County Development Plan- Response The Draft County Development Plan has been translated into Irish. The Council will ensure that the Irish version is published as soon as is practical.</p>
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It is stated that holiday homes should not be permitted in Gaeltacht areas or limited to not more than 10% of the total stock of the ED.

It is stated that the provision of different types of housing in the Gaeltacht should be investigated so that the use of the Irish language will be stronger. The submission states that it is critical that social housing be provided for those who are qualified for it in the Gaeltacht areas. The submission states that people who are entitled to social housing are forced out of their own community because not enough housing is being built in the Gaeltacht. It is stated that this is not in compliance with Government policies from a language planning point of view as set out under Act na Gaeltachta 2012.

The submission states that there is no point in talking about language planning if there are no people living in the Gaeltacht that can speak the language. Therefore, the submission recommends that housing in the Gaeltacht be wholly directed on retaining and strengthening the Gaeltacht community and to accept that a person who can speak Irish has established a local need. It is stated that this would improve the planning process for people of Gaeltacht.

In respect housing planning in the Gaeltacht, the submission states that the following should be a target of the housing policy in the Development Plan:

- To increase the number of Gaeltacht people living within their own community
- Give opportunity to fluent Irish Speakers move to live in the Gaeltacht
- Improve local economy and economic development of the Gaeltacht

Development to be of benefit to the Irish language

The submission refers to the legal obligations the Council has under the Planning Act, specifically where a development plan is being prepared that has a Gaeltacht area and the need to ensure that any development in the Gaeltacht area has a positive impact on the language and culture.

The submission refers to the decision of the High Court to quash a planning permission granted by An Bord Pleanála for a housing and guesthouse development in Gaeltacht Ráth Chairn. The submission outlines that the High Court concluded that there was no proof given that the development would enhance the use Irish language in the Gaeltacht as is required under national policy. The submission therefore requests Kerry County Council to outline how they intend to ensure that that any developments including Council work programmes and tourist policy within the recognised Gaeltacht areas are of

benefit to the Irish language and the Gaeltacht communities of Corca Dhuibhne and Uíbh Ráthaigh. It is stated that the Council should not operate any policy that does not comply with language planning.

Independent language Impact Assessment and Occupancy Clause

The submission makes recommendations in relation to the language impact assessment where it should be carried out and by whom – recommended that it be prepared by an independent Irish speaker who is qualified in language planning. It is stated that the assessment should prove that the development would enhance the daily use of the Irish language. The submission sets out criteria that should be included in the assessment, which would include the language ability of the applicant be they native or prospective inhabitants and whether it is the language of the home for example.

Housing estates and language condition.

The submission recommends that TEG B2 or higher in spoken Irish should be required for those outside the electoral division. That it be demonstrated that the housing development would be of benefit to and advance the use of Irish as the primary community language. It is suggested that the % of development retained for Irish Speakers be increased from 66% to 80% under objective KCDP 8-8.

Naming of Housing Developments

The submission recommends that every new housing development be named in Irish only. It is stated that this is the current policy in Galway city and Council and that Dublin City Council have proposed to implement the same policy.

In addition, it is requested that a committee on placenames be established, that this would avoid mistakes such as the Páirceanna na Glasa in Dingle.

Language Plans

The Council should support (financially, staffing and other support) the language plans for Cathair Saidhbhín, Tralee and Dingle. The Council has a central role in the operation of this plans.

<p>KE-C1-293 Clíodhna Ní Bheaglaioich</p>	<p>Short Term Lets Conradh na Gaeilge commends the Council in trying to reduce the number of Air B+B Corca Dhuibhne, recommended to extend it to Uíbh Ráthaigh.</p> <p>Linguistic Expert The submission recommends that the Council employs a linguistic expert in the planning department.</p> <p>Irish Version of Draft Plan Publish the Irish version of the Development Plan simultaneously with the English version.</p>	
<p>KE-C1-277 Orla Ní Shíthigh</p>	<p>The submission states that priority should be given to those who were born and reared in the local area and who wish to raise their children through Irish. It is stated that the connection the person has with the local area (the land and the community) is taken into account when assessing housing issues.</p> <p>The submission states that there should be guidelines in place 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>Kerry County Council should start a scheme for those with a good command of Irish that wish to buy a house in the area. It is impossible for young people of the Peninsula to compete with those who have plenty of money.</p> <p>It is stated that overall, the Draft Plan does not protect the Irish Language and that this is not good enough for the Irish language or for the Gaeltacht people</p>	
<p>KE-C1-228 Aine Uí Dhubhshlaine</p>	<p>This submission states that the Council has a responsibility to ensure that all developments that take place in Gaeltacht areas is in the interests of the language and that there is a need for additional language policies to be included in the draft plan, particularly in the area of housing. It is stated that language policy should be central to the planning process.</p> <p>Objectives KCDP 8-1 to KCDP 8-10 should be central to the provision of housing for muintir na Gaeltachta and Irish speakers. The Gaeltacht should be recognised as a linguistically sensitive area.</p> <p>Furthermore, the submission states that the number of holiday homes in the area should not affect a local person seeking planning permission.</p>	

<p>KE-C1-80 Kerry IFA</p>	<p>The submission highlights the importance of a strong community that is confident in its culture, (Irish speaking) and sustainable environment and beautiful views, in attracting tourists to the area. It further states that Bailte Fearainn are an integral part of the inherited planning for housing and working on the Dingle peninsula. The submission extends an invitation to come to Tig Áine and have a normal planning meeting.</p> <p>The submission states that it is their strong believe that it should be a fundamental right of Gaeltacht people and their family to settle in their native place if they so wish, if their planning application accords with good planning practice.</p> <p>The submission highlights that under section 8.1.3 preservation of Irish, KCC states that the main factors that need to be considered in the preservation of the Irish are demographics, economic factors, facilities, and infrastructure. The submission states that without Gaeltacht people settled there in the first place there will be no language to preserve and therefore no point in talking about the factors referred to above.</p> <p>It is stated that in section 8.1.3 of the Development Plan that the Council gives figures for the number of one-off houses granted in the Gaeltacht for the past 6 years but that the Council does not give figures for the numbers that had pre-planning meetings that did not go as far as the planning application stage. It is submitted that many of these were farming families. The submission states that these are people who have spent their life (as did the people before them) conserving not only their native language but also the way of life of the people that went before them.</p> <p>The submission states that as a consequence of low income, rising costs and increasing bureaucracy, it is a challenge to attract the next generation to farming. It is stated that despite the challenges people are willing to farm but the Council must assist them. Without them there will be no Gaeltacht, Irish or community.</p>	<p>Points raised are noted.</p> <p>It is hoped that the amendments made to the settlement policy with respect to Gaeltacht areas and the Council's commitment to formulating an integrated strategic language planning process for the Gaeltacht and to Gaeltacht proofing all activities undertaken by state organisations, as set out on Section 8.1.3 of the Plan, assist in the preservation of the language and its promotion as the community language of the Gaeltacht.</p> <p>The Council has set out its commitment to facilitate and to support the various language plans under objective KCDP 8-6 of the Draft Plan.</p> <p>Kerry County Council through its Scéim Gaeilge IV, 2018-2021 has already committed to promoting the provision of services through the Irish language for the people of the Gaeltacht.</p>
<p>KE-C1-148 Eibhlín Gleeson</p>	<p>The submission requests that the Irish should be spelt correctly in all new housing estate developments in the County.</p>	
<p>KE-C1-352 T Ní Mhainín</p>	<p>The submission recommends that a linguistic expert be engaged by the Council to ensure that no development is proposed in the plan that would harm the Irish Language.</p>	<p>Points raised in the submission have been noted.</p> <p>It should be noted that Section 5.8 of the Draft Plan focuses on renovation and restoration of existing and vacant buildings situated in rural areas. Here the Planning Authority has stated that it will give priority and positive consideration to</p>

<p>KE-C1-207 John Prendergast</p>	<p>In addition, it is requested that the Council will commit to working with the language planning in the two Gaeltacht areas to support the Council achieve the ambitions of the Development Plan.</p> <p>The submission states that the number of holiday homes should not be used as a reason to refuse locals trying to reside in their own townland and that this be recognised in the Plan.</p> <p>That officials dealing with business and or applications from the Gaeltacht have fluent Irish. That Gaeltacht people and those with Irish are able to conduct their business with the Local Authority through Irish.</p> <p>The submission refers to the statement on page 117, section 8.1.3 (preservation of the Irish Language) of the Draft Plan: <i>'It is important to ensure that any developments within the recognised Gaeltacht areas are of benefit to the Irish language and the Gaeltacht communities of Corca Dhuibhne and Uíbh Ráthaigh.'</i></p> <p>The submission states that as a Local Authority there is a fundamental moral and statutory obligation to comply with the above statement and to ensure that development in the Gaeltacht is of benefit to the language. Policies with respect to the Gaeltacht and Irish should be in other chapters in the Draft Plan so that these important provisions are not ignored. Specifically housing policy is referred to in the submission. It is stated that knowledge and use of the language should be a fundamental requirement for anyone looking for planning permission in the Gaeltacht. As stated in the Plean Teanga Chiarraí Thiar 2018-2015 if the need for the language is not required it cannot be expected that the aims of the plan will be achieved. The submission requests that the Local Authority would ensure that development within the recognised Gaeltacht areas be of benefit to the language as well as to the Gaeltacht community.</p> <p>It is submitted that Kerry County Council now has an opportunity to be proactive, ambitious and serve as an example for other local authorities with this draft Plan. It is possible to move forward with the language impact assessment, with positive policies for native Irish speakers and to ensure the practical and strong advancement of the Gaeltacht.</p>	<p>the renovation and restoration of existing structures and vacant buildings in the rural countryside for use as permanent primary residences. Further it is the policy of the Council (section 5.5) to Protect sensitive landscapes and other environmentally sensitive areas from unsustainable development. Additional text is not considered necessary.</p> <p>While recognising the Council's obligations under the Housing Act to take into consideration the housing need of social housing applicants irrespective of linguistic ability, together with its commitment to preserve and promote the Irish language; objective KCDP 7-1 seeks to prepare a housing Delivery Action Plan in accordance with Housing for All and deliver on the actions outlined therein over the lifetime of the Plan. This will supply adequate levels of social and affordable housing to ensure all sectors of society have access to housing including a range of accommodation types for all members of society.</p>
<p>KE-C1-310 CFCD</p>	<p>The submission states that there are opportunities to make the CDP stronger and more effective in supporting the language and the Gaeltacht community. Revisions are recommended to be made to the draft plan, in particular:</p>	

- Greater emphasis on integration of language planning and physical planning.
- Recognition of the particular housing challenges in the Gaeltacht.
- More supportive policies for rural housing for Irish speakers.
- Addressing the need for affordable housing for Irish speakers.
- A more cautionary approach to housing estate development.

The submission states that planning applications in the Gaeltacht should be subject to specialist language assessment (in the same way as ecology or conservation specialists advise on natural or built heritage). It is stated that Gaeltacht language planning officers should be central to this process, that they could advise on whether a proposed development will strengthen the language in the community, or weaken it. The submission states that impact on language needs to be integrated into the overall assessment process

It is stated that the Draft Plan refers to statistics on demographics, and the success rate of planning applications, however it is stated that the focus needs to be more on how planning outcomes relate to use of language and social aspects. A fall of 19% in the use of Irish between 2011 and 2016 is a serious concern. The submission refers to the requirements under the Sustainable Rural Housing Guidelines, 2005, DEHLG which state that special consideration to the effects of new development in Gaeltacht areas on the survival, use and development of the Irish language as a means of daily communication should be given.

The submission suggests that additional text be included under section 8.1.3 Preservation of the Irish Language. It is recommended that this text should highlight that the renovation of old or derelict dwellings and more sensitively sited, scaled and designed housing, are ways to reduce the impact of new development on the landscape and the negative impact holiday homes can have on Gaeltacht areas.

Additional amendments are suggested in respect of requiring an independent language impact assessment for multi unit developments and that occupancy clauses be imposed to require the sale of certain % of developments to Irish speakers.

The submission states that in 2020 CFCD commissioned an expert report by Doyle Kent Planning Partnership that examined Gaeltacht planning policies at national level. This report confirms that positive and effective policies are in place in some Gaeltacht counties (refer to **Appendix B** for selected

<p>KE-C1-377 Cristín de Mórdha</p>	<p>references). It is their view that Kerry can follow a more supportive approach in the final CDP 2022 – 2028. A revision to the policy of Section 5 of the draft CDP in relation to rural housing policy is proposed.</p> <p>CFCF have listed a number of recommendations/suggestions under the headings of Preservation of the Irish Language, Irish Language Policies and Rural Settlement Policies.</p> <p>The submission also refers to the particular housing challenges in the Gaeltacht due to the desirability of the physical environment to outsiders, the lack of housing supply and cost of housing. It is stated that if Irish speakers and particularly younger people and families are ‘squeezed out’ this will have a negative impact on the language. The CDP should recognise this concern as it relates to the physical planning of the Gaeltacht. A more pro-active approach is needed.</p> <p>A number of suggested amendments are proposed including additional text be added to the plan requesting that the Council outline its commitment to ‘Work collaboratively with the Gaeltacht community in the planning of housing and other development by engaging with language aspects in pre-planning discussions, and supporting a vibrant and growing Irish language community’ and amendments’</p> <p>The submission requests that ‘The council recognises that additional social and affordable housing is important for language vitality, particular given the high cost of housing in many Gaeltacht areas. The council will work pro-actively to address this demand including in rural areas, villages and towns in the Gaeltacht. It will consider innovative ways to deliver social and affordable housing including partnership with community organisation and voluntary housing bodies.</p> <p>The submission states that stronger policies with respect to the Irish Language and rural housing are needed. It is recommended that questions in respect of the language (ability) be included where a planning application is being made in the Gaeltacht.</p> <p>The submission states that policies should be drafted to give priority to Gaeltacht people where they wish to live permanently in the Gaeltacht. It is stated that if Gaeltacht people themselves cannot settle and work in the Gaeltacht and raise their family there, there will be no Gaeltacht. The</p>	
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<p>KE-C1-208 Todhchaí na Tuaithe</p>	<p>submission states that people living permanently in an area is vital for the survival of any community, but it is particularly more important for a Gaeltacht community where it is necessary to preserve and promote the language as a community language. It is stated that the number of holiday homes should not be used as a reason to refuse planning permission. The submission highlights that the question of the Irish language is applicable to every chapter of the plan not just to the chapter 8. It is recommended that strong policies be included in the different chapters to ensure the advancement of the language in the County.</p> <p>This submission outlined issues regarding the protection of the Irish Language and building sustainable communities.</p>	
<p>KE-C1-229 Oidhreacht Chorca dhuibhne</p>	<p>This submission outlines the background and work of Oidhreacht Chorca Dhuibhne, which is located in Baile an Fheirtéaraigh to promote the social, economic and cultural life of the Chorca Dhuibhne Gaeltacht. It states they run educational language and heritage and cultural schemes including Irish language course at all levels for adults. Their remit has expanded over the years. Coláistí Chorca Dhuibhne organise Irish courses for students which is worth €5 million to the local economy. They co-operate with other organisations such as Tobar Duibhne, Dúchas an Daingin and local community groups to promote the Irish language in the community.</p>	
<p>KE-C1-358 Cllr. Breandán Fitzgerald</p>	<p>Language Expert A number of recommendations have been made to the Council including that a language expert be engaged and that the Council prepare a separate development plan focused on the Gaeltacht. It is stated that this plan would be prepared with all relevant stage agencies.</p>	

<p>Social Housing The submission states that when assessing applicants for social housing the Local Authority should emphasise the requirement for the language in a Gaeltacht area for a social house. It is stated that the Council should ensure that every effort is being made to preserve the language irrespective of the ability of the applicant. In addition, it is stated that there should be sufficient time available prior to getting a key to a house for the applicant to achieve a good level of Irish.</p> <p>Settlement Issue The submission outlines the importance of understanding the historical settlement pattern that has existed for years in rural Ireland and the strong connection that can exist between the parish and the GAA club. The submission states that these traditional settlement patterns should be taken into account in planning decisions particularly now given new work and life style opportunities.</p> <p>Holiday homes The submission states that the number of holiday homes should not be used as a reason to refuse planning permission and that the younger generation should not pay for planning decisions made in the past. They request that a statement pertaining to that be included in the Draft Plan.</p> <p>Language Impact Statement and Occupancy Clause The submission states that it is important that housing developments are subject to an Irish Language clause, this is necessary to achieve the targets of the various language plans. Recommendations are made in the submission to amend KCDP 8-8 to increase the % of dwelling units to be reserved for Irish speakers to 80% to ensure that there is a critical mass of Irish Speakers living there.</p> <p>Council Service through Irish The submission requests that the Council attends to the needs of the Gaeltacht completely through Irish. It is stated that people should be appointed to provide a service through Irish and that all the officials dealing with planning applications in the Gaeltacht areas should be fluent in Irish.</p> <p>The submission seeks support for the Gaeltacht and its people and states that the Irish Language is an integral part of the Gaeltacht area. It further states that Irish speakers need to be supported in obtaining planning permission.</p>	<p>Holiday homes - Response Comments made in respect of the number of holiday homes is noted. However, it should be noted that a significant number of these properties were permitted as permanent places of residence. It should also be noted that the letting of a property on a short term basis is a material change of use of the property and requires planning permission and that the Local Authority is using all of its functions available to it to try to tackle the unauthorised letting of properties as holiday homes.</p> <p>Council Service through Irish –Response It is acknowledged that proactive measures are important in ensuring the survival of the Irish language and its associated Gaeltacht culture.</p>
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		It is an objective of the plan KCDP 8-4 and Corporate Plan to ensure that Council services are provided in the Gaeltacht through Irish in accordance with the Official Languages Act 2003
KE-C1-202 Todhchaí na Tuaithe	This submission seeks that all Council executives dealing with planning applications from the Gaeltacht be fluent in Irish and requests that the plan is amended to reflect this.	It is an objective of the plan KCDP 8-4 and Corporate Plan to ensure that Council services are provided in the Gaeltacht through Irish in accordance with the Official Languages Act 2003.
KE-C1-230 Tascfhórsa Uíbh Ráthaigh	<p>The submission welcomes the Council’s commitment (1.9.3.6) to align with Straitéis 20 Bliain Don Ghaeilge 2010-2030 (20 Year strategy for the Irish language). They recommend that the text in this paragraph be amended, to ensure a wider geographical focus than the designated Gaeltacht areas. This is particularly important in Iveragh, given the problematic administrative delineation of the Gaeltacht. Therefore, the promotion activities should relate to ‘all places in which Irish is currently and potentially used, most especially in the Gaeltacht communities, the designated Gaeltacht Service Towns and the surrounding communities’.</p> <p>The text on rural areas (page 68) presents three principles. The third principle rightly refers to the protection of environmental assets. Given the importance of people and culture to Kerry’s tourism sector and their roles as guardians of the countryside, this principle ought to be expanded to include socio-cultural assets. The submission recommends that the Gaeltacht and Irish language feature more prominently in other chapters, particularly the economic development and tourism chapters. It is important to note that the Gaeltacht boundaries were drawn in 1956 and that in 2022 (to 2028) a more dynamic geography exists. The entire area from Kells to Castlecove represents a coherent network of communities in which there are— both within and outside of the 1956-designated boundary. Therefore, in order to ensure a more holistic and sustainable approach to the promotion of the Irish language, the entire area needs to be treated as a coherent unit. Indeed, the plan also needs to take cognisance of enabling and supporting use of the Irish language everywhere in County Kerry.</p> <p>Correct the spelling of Uíbh Ráthach (map 8.1).</p> <p>Economic opportunities</p> <p>The submission has the following recommendations and observations to make;</p> <ul style="list-style-type: none"> -Welcome the commitment made in this draft CDP to the development of a Digital Strategy for the county. -The strategy should reflect the potential for economic enhancement of smaller communities on the periphery of the county as well as the larger centres, and enable workers, learners and the community at large to fully realise and utilise 	<p>Response</p> <p>Irish language and Culture</p> <p><i>Straitéis 20 Bliain Don Ghaeilge 2010-2030</i> promotes a holistic, integrated approach to the Irish language which is consistent with international best practice. The Strategy is the result of a consultative and research process, including a report commissioned by the department (DCU, 2009), the Comprehensive Linguistic Study of the Use of Irish in the Gaeltacht (NUIG & NUIM, 2007), and the report of Coimisiún na Gaeltachta (2002). Nine areas for action are set out in the Strategy which include the Gaeltacht. However, the Strategy does not specifically restrict its attention to Gaeltacht areas, therefore the text under section 1.9.3.6 of the Draft Plan should be amended as follows:</p> <p>The Strategy 2010-2030 promotes a holistic, integrated approach to the Irish language which is consistent with international best practice. Nine areas of action are set out in the Strategy including economic, social, and cultural development policies for the Irish Language and Gaeltacht areas. It contains particular policies for cultural and linguistic initiatives and language-based projects. In this context, particular importance is attached to the preservation and promotion of Irish in the Gaeltacht in relation to conserving and protecting the heritage, culture, and richness of the language where it remains as a household and community language. It is agreed that socio-cultural assets should be inserted alongside environmental assets.</p> <p>Amend point 3, Section 5.1 as follows:</p> <p>Rural Kerry is an important national and international tourism and heritage asset, and its environmental and socio-cultural assets will be protected.</p> <p>Economic Development</p> <p>Points made under this title are noted. However, the County Development Plan is a strategic land use Plan and some of the issues highlighted are more relevant to the Local Area Plan. The Draft County Development Plan has set out a clear settlement hierarchy (which prioritises settlements for development) and this was informed by the National Planning Framework and Regional Spatial and Economic Strategy for the Southern Region. Investment in infrastructure and services in the County will be</p>

<p>the benefit of digital lives as set out in Harnessing Digital - The Digital Ireland Framework in an inclusive, safe and secure way.</p> <p>-Specifically in respect to 9.7.4 Table 9.4, we request the inclusion of gteic An Dromaid in this table, developed by Údarás na Gaeltachta and Forbairt na Dromoda as a result of the strategic decision to locate a BCP within this community complex.</p> <p>It is recommended that Kerry County Development Plan (2022-2028) give particular and concerted effect to the following policy measures, as set out in Our Rural Future: 12; 23; 33; 65; 66; 89; 90; 91; 105; and 106. Therefore, we recommend that the CDP ensure and / or support:</p> <ul style="list-style-type: none"> • Adequate and appropriate zoning and provisions for infrastructural investments to ensure the delivery of the economic development and diversification policy measures (12. 23), so that communities contribute to, and benefit from, regional growth in respect of job creation and retention; <p>Transport</p> <p>It is recommended that Kerry County Development Plan (2022-2028) give particular and concerted effect to the following policy measures, as set out in Our Rural Future: 90; 91; 105; and 106. Therefore, we recommend that the CDP ensure and / or support:</p> <ul style="list-style-type: none"> • The upgrading and provision of infrastructure that provides for an improved local transport service (in line with measure 91), strengthens and facilitates the delivery of the Language Development Plan (measure 105) and promotes linkages – physical, ICT, social, economic and cultural – between all parts of Gaeltacht Uíbh Ráthaigh and Cathair Saidhbhín (measure 106). • That provision for public transport connection (statutory and community) needs to be incorporated into Strategic Objectives 6-15 to 6-19. <p>Public Transport</p> <p>It is recommended that Kerry County Development Plan (2022-2028) give particular and concerted effect to the following policy measures, as set out in Our Rural Future: 33;. Therefore, we recommend that the CDP ensure and / or support:</p> <p>The development of tourism infrastructure in Gaeltacht Uíbh Ráthaigh, so that the locality can strengthen the current offering and develop new opportunities, and thereby be branded effectively, in line with policy measure 33;</p> <p>Housing related developments</p> <p>The submission recommends that the Kerry County Development Plan (2022-2028) give particular and concerted effect to the following policy measures, as set out in Our Rural Future: 57; 58. Therefore, we recommend that the CDP ensure and / or support:</p>	<p>influenced by the settlement hierarchy in the coming years. However, the Council is very committed to strengthening rural areas and rural settlements and acknowledges the potential these areas now have particularly with advancements in technology and the new opportunities that exist to work remotely. The Development Plan has set out various policies and objectives in its various chapters to support this.</p> <p>Housing related Developments</p> <p>Points raised noted. As stated, investment in infrastructure and services in the County will be influenced by the settlement hierarchy in the coming years. The Council is however very committed to strengthening rural areas and rural settlements and the Development Plan focuses particular attention in terms of the policies and objectives set out in it to support this.</p> <p>Note that a settlement or area does not need to be specifically mentioned under a policy to allow for its consideration under that policy. Please also see responses to submission numbers 1-309, 1-131, 1-355, 1-393 and 1-342 made in respect to rural housing in the Gaeltacht.</p> <p>With respect to the request to include Caherdaniel as a small village settlement under table 5.1, please note that this settlement is zoned for development under the West Iveragh LAP 2019-2025.</p> <p>The following amendment are proposed on foot of the submission:</p> <p>Map 8.1 Correct spelling of Uíbh Ráthach</p>
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- The prioritisation and accelerated roll-out of water (supply and treatment) infrastructure, to enable the development of existing settlements and the development of new housing, particularly in areas currently not covered by Irish Water’s work programme – as stated in policy measures 65 and 66. The priority locations are Baile an Sceilg and Cillín Liath, in addition to supporting the development of an ICW in Cathair Dónall and in other locations, as required, over the lifetime of the plan;
- Renewal of derelict and semi-derelict properties and brownfield sites, throughout Gaeltacht Uíbh Ráthaigh and adjoining areas, so as to increase full-time and year-round residential occupancy, as specified in policy measures 57 and 58;
- The development of residential properties, including new-built (group and individual) in Gaeltacht locations, including in areas of open countryside, so that, as stated in policy measure 89, the countryside is a ‘lived-in landscape’; specific focus in terms of group housing to be given to development opportunities using state-owned (for example An Seachnoc – Folio: KY7970F) and community-owned lands within the Gaeltacht; and
- We welcome the inclusion (presented in Table 5.1) of An Chillín Liath, An Gleann and Castlecove among the locations in which housing clusters will be permitted. We recommend that Cathair Dónall (Caherdaniel) be added to this table, so that it becomes consistent with Table 5.4. In parallel, the upgrading of wastewater treatment facilities in Baile an Sceilg / Dún Geagáin needs to be prioritised.

Map 5.1 (rural area types) and the accompanying text correctly recognise the need to facilitate housing development in Gaeltacht Uíbh Ráthaigh. We wish to complement the methodology through which this map was devised by providing local knowledge and insights, and considering our strategic aims, we wish to suggest the inclusion as ‘other rural areas’ of the townlands between Aughtabbrid, An Ghleann and Reenroe and the townlands east of, and including, Coars.

We welcome the Objectives 5-23 to 5-29 in respect of restoring and renovating vacant and unused buildings in rural areas. We encourage Kerry County Council to be reasonable in enforcing architectural conditions, in order to ensure balance between architectural conservation and the associated costs and thereby promoting liveability. In townlands that are in designated CLÁR areas, the priority should be to make the dwelling habitable and energy efficient. Page 81 presents two conditions for the selection of properties that ought to be considered for renovation / restoration. The first of these is that the roof ought to be intact. While this condition may be workable in low-lying inland parts of County Kerry, it is completely unreasonable in West Iveragh. Given the

peninsula's exposure to the prevailing south-westerlies, the roof of an unoccupied property is far more susceptible to earlier and more significant damage than is the case in other locations. One winter in West Iveragh could have the same effect on a property's roof as a lifetime in Killarney. Thus, this discriminatory condition, which runs counter to the earlier objectives (in respect of promoting the restoration / renovation) of abandoned properties, ought to be deleted.

The submission recommends the transposition of the Flemish decree into planning practice so as to end the discrimination against those who want to have a family home in the Gaeltacht.

The submission recommends that Gaeltacht Uíbh Ráthaigh be designated as a pilot location, on a three-year basis, for the bespoke application of the Flemish Decree, so that all persons, regardless of their background, who demonstrate a commitment to the locality and to the Irish language, have the right to build a family home.

Urban regeneration

The Submission notes paragraph 4.3.2 in relation to the development levy reductions in respect of brownfield sites, and recommends that these be maximised in respect of derelict and unoccupied buildings, in West Iveragh, that are being brought into use – as commercial units and / or as permanent residences.

Regarding reference in (4.2.3) to the vacant sites' register and should be fully embraced and applied – in both urban and rural areas. The derelict sites register should be published online, so that development processes benefit from greater transparency.

Regarding reference in(4.3.5) to the Repair & Leasing scheme. The text refers to this in respect of 'town centre housing'. We recommend that it have a wider application – including in Gaeltacht Uíbh Ráthaigh and the surrounding EDs. KCDP 4-28 ought to be worded to reflect a more inclusive geography.

Regarding reference in (4.3.6) to the Buy & Renew Scheme, as this has the potential to respond, in part, to the housing need in Iveragh, and we recommend that the text here make specific mention of West Iveragh.

KCDP 4-47 ought to be amended to ensure its application extends beyond urban centres. It should specify structurally weak rural areas.

The submission makes reference to policy statements from both RSES and Our Rural future which the submission states are relevant to the County Development plan

	<p>Sustainable living</p> <p>The submission notes the housing policies that are listed on pages 91 and 92, and we encourage Kerry County Council to link these – not just to the principles articulated in Chapter 6, but the wider needs and potential of County Kerry</p>	
<p>KE-C1-431</p> <p>Máiréad Ní Chaomhánaigh de hOra</p>	<p>The council must cater for the Irish speakers. The use of Irish will increase by virtue of the number of speakers in the area.</p>	<p>Points raised are noted. The Council is committed to the preservation and promotion of the Irish Language and numerous policies and objectives in this Development Plan support this.</p>
<p>KE-C1-477</p> <p>Todhchaí na Tuaithe</p>	<p>Seeks the appointment of staff who are fluent in Irish.</p> <p>Priority be given to the local community before tourism needs (such as views and prospects)</p> <p>Archaeological preservation is welcomed but should not be used as an impediment against locals</p> <p>Holiday homes /tourist are welcomed but should not be used as an impediment against locals</p> <p>It suggests that townlands be recognised as suitable for single house development within clusters. There needs to be a redefining and understanding of cluster.</p> <p>Is recommends that planning policy should target people’s personal choices within a flexible framework</p> <p>That the rights of the Irish speakers whose livelihood is not agri based be recognised as entitled to live in Gaeltacht rural areas in order for the language to survive.</p> <p>The aim of the council should be to recover the number of daily speakers to over 67%, by actively supporting families to build or purchase homes.</p> <p>It is suggested that a linguistic need should be included as a criteria in order to live in the area.</p> <p>The submission states that the number of holiday homes in the Gaeltacht townlands should not be used as a reason for refusal of planning to local people.</p>	<p>Points raised are noted. The rural housing need criteria facilitates those with an economic or social need to reside in the Gaeltacht as set out under section 5.5.2, this facilitates most applicants from the Gaeltacht. In addition, amendments have been proposed to the criteria which specifically identifies the need of those with Irish to reside in a Gaeltacht area. See responses made to submission no. 1-309, 1-131, 1-355, 1-393 and 1-342.</p> <p>With respect to the point raised in respect of views and prospects and Archaeology see response to submission no. 1-203.</p> <p>The density of development in an area is relevant when planning applications are being assessed, in particular in relation to visual impact on the landscape, traffic safety, and the proliferation of individual wastewater treatment systems. A distinction is therefore not made on whether houses are holiday homes or not, but it is the overall level of development in an area that is relevant and the limited capacity that exists in the landscape to accommodate additional development as a result.</p>
<p>KE-C1-363</p> <p>NEWKD</p>	<p>The submission requests amendments to Objective KCDP 8-14 to read as follows "Promote the Gaeltacht areas as economic loci and support the role of Údaras na Gaeltachta in developing economic strengths and opportunities in the Gaeltacht and mechanisms to attract and support access to increased employment opportunities and social enterprise".</p>	<p>Amend objective KCDP 8-14 to include the “attract”</p>
<p>KE-C1-391</p> <p>Cahersiveen Community and Business Alliance</p>	<p>The submission welcomes the Council’s commitment to supporting Cahersiveen in its role as Baile Serbhíse na Gaeltachta/a Gaeltacht Service Town and seeks promotion of an Ghaelige (teanga agus cultúr) across all communities from Kells to Castlecove.</p>	<p>Submission noted</p>

<p>KE-C1-111 Mol Teic (t/a Dingle Hub)</p> <p>KE-C1-199 Dingle Business Chamber</p>	<p>It is recommended that the redevelopment of the former Dingle Workhouse/Hospital should be specifically included in the Development Plan, as it has the potential to become an important facility for contributing to the social and economic development of the Peninsula, while also preserving a very significant historic building.</p> <p>The submission seeks to transform the Old Dingle Hospital into an Enterprise and Innovation Hub, and a community and tourism visitor centre, to be listed as a key project in the plan to support employment and be transformative for the town.</p>	<p>Supportive policy in relation to the redevelopment of the Dingle Hospital as outlined in the submission as contained in the Corca Duibhne EA LAP</p>
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Recommendations

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.

Amend KCDP 8-6 as follows: *Éascú agus tacú le Pleananna Teanga an Chontae: Tobar Dhuibhne - Plean Teanga Chiarraí Thiar (2018), Dúchas an Daingin - Plean Teanga do Bhaile Seirbhíse Gaeltachta Daingean Uí Chúis agus Brí Uíbh Ráthaigh - Plean Teanga Chiarraí Theas (2019), go háirithe leis an sprioc atá acu líon na gcainteoirí laethúla Gaelainne a ardú go fadtéarmach sna Ceantair Ghaeltachta."*

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 Uíbh Ráthaigh - Plean Teanga Chiarraí Theas (2019) language plans, to achieve their target of increasing the number of daily Irish Speakers, long term in Gaeltacht areas.*

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 objective 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 as follows 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.*

Insert the following text under section 8.1.1.1 *'new initiatives... the development of Limistéir Phleanála Teanga (LPT) (Language Planning Areas) and the development of Bailte Seirbhíse Gaeltachta (BSG) (Gaeltacht Service Towns).* The designation of *BSG* is a recognition ...resources.

Insert under section 8.1.3 the following new text: 'Under the Gaeltacht Act 2012, *Bailte Seirbhíse Gaeltachta* (Gaeltacht Service Towns) *Tralee, Dingle and Cahersiveen* are defined as those towns situated in or adjacent to *Limistéir Phleanála Teanga (LPT) Language Planning Areas* and which have a significant role in providing public services, recreational, social, and commercial facilities for those areas. *26 Limistéir Phleanála Teanga (Language Planning Areas)* have been recognised for the purposes of the Act.

Insert under Section 8.1.4 the following text: ...implemented in *26 Limistéir Phleanála Teanga* (language planning areas) and three *Bailte Seirbhíse Gaeltachta* Gaeltacht service towns by the end of 2025.

Under section 1.9.3.6 of the Draft Plan should be amended as follows:

The Strategy 2010-2030 promotes a holistic, integrated approach to the Irish language which is consistent with international best practice. Nine areas of action are set out in the Strategy including economic, social, and cultural development policies for the Irish Language and Gaeltacht areas. It contains particular policies for cultural and linguistic initiatives and language-

based projects. In this context, particular importance is attached to the preservation and promotion of Irish in the Gaeltacht in relation to conserving and protecting the heritage, culture, and richness of the language where it remains as a household and community language. It is agreed that socio-cultural assets should be inserted alongside environmental assets.

Amend point 3, Section 5.1 as follows:

Rural Kerry is an important national and international tourism and heritage asset, and its environmental **and socio-cultural** assets will be protected.

Amend objective KCDP 8-14 to include the **“attract”**

Amend Map 8.1 Correct spelling of Uíbh Ráthach

Chapter 8 – Gaeltacht Areas, Culture & Heritage -Archaeological Heritage		
	Submission Summaries	CE Response and Recommendations
KE-C1-203 Todhchaí na Tuaithe	The cover letter of this submission states that the development needs of the local community should be given priority over the needs of the tourist. This submission welcomes the Council’s recommendations that archaeology be part of planning concerns (p. 120, 8.3.2), however states that the protection of the language should be given equal status to archaeological protection. The submission further states that if an archaeological survey is required on a site, the cost involved should be met by the Council.	Points raised are noted, however with respect to the requirement to carry out an archaeological survey and its cost it is not feasible to suggest that the Council met the cost of a development they are not proposing themselves.
KE-C1-419 Marianne Browne	This submission refers to objectives KCDP 8-22 to KCDP 8-31. It states that KCC need to protect and preserve archaeological monuments (including Rattoo Round Tower) and feature artefacts not yet listed and that these archaeological sites should not be set against a backdrop of wind energy turbines - See objectives KCDP 8-27 and KCDP 12-1. This submission requests that The Ballynagare Glebe be considered for archaeological investigation. Covered by Chapter 8 - covering objectives KCDP - 8-22 and KCCDP 8-23.	Points raised noted. Objectives KCDP 8-25 clearly states that it is an objective of the Council to: “Ensure that development (including forestry, renewable energy developments and extractive industries) within the vicinity of a recorded monument, zone of archaeological potential or archaeological landscape does not detract from the setting of the feature and is sited and designed appropriately and sympathetically with the character of the monument/feature/landscape and its setting.” No amendment proposed.
KE-C1-179 Pádraig de Brún	The submission states that the Plan ignores the origins of North Kerry as it has a long existence before the completion of its amalgamation with the County of Desmond in 1606. The submission further states that there doesn't seem to be any reference in the Plan to Ballynagare Glebe, near Lixnaw.	Point raised noted.
Recommendations		
No proposed amendments.		

Chapter 8 – Gaeltacht Areas, Culture & Heritage - Built Architectural Heritage		
	Submission Summaries	CE Response and Recommendations
KE-C1-200 Amy Rudd	This submission requests that reference is made to the preservation of the remaining Industrial heritage buildings/sites of Kerry in the built architectural heritage section of the plan, given that Kerry was home to three transatlantic cable stations. This would be complementary to the admirable aim of Kerry County Council of supporting the UNESCO bid for Valentia cable station	The Waterville Cable Station is an existing protected structure that is included on the Council's Record of protected Structures, reference number 98-1 (21309801). Its special categories of interest include Architectural, Artistic, Historic and Social in recognition of its socio-historical contribution to the area.
KE-C1-173 Milltown Community and Chamber Alliance	The submission states that the draft CDP (p. 34) refers to enhancing the unique identity, character and built heritage of Kerry's towns and to the further development of green and blue infrastructure. Milltown has significant assets in these regards that remain under-utilised, and the CDP should provide leverage for their harnessing and development.	Point raised noted. The Local Authority will support and facilitate sustainable plan led development in Milltown.
KE-C1-127 Farranfore Development Association	<p>The submission makes the following comments and Recommendations</p> <ul style="list-style-type: none"> -Highlight and promote the significance of Farranfore's Transport History and its importance in terms of travel and logistics within the County. -Protect and conserve any remaining structures and features associated with Farranfore to Valentia branch railway line, in particular the water tower at Farranfore Junction and which is now the centrepiece of Farranfore Railway Park, as well as the old platform and turntable located on the site of Farranfore Junction adjacent to the current mainline Farranfore Railway Station. -The bridges on the Tralee, Castleisland and Currow approaches form part of the vernacular architecture and should be conserved. Lighting them would provide a nice entrance framework to the village 	It is proposed in objective KCDP8-34 to prepare an Architectural heritage Plan for the County including marine, industrial, and agricultural heritage. In addition, KCDP8-38 seeks to retain and repair/upgrade railway bridges and tunnels. It is envisaged that the county's railway heritage will be addressed in response to those stated objectives. The existing record of Protected Structures includes Farranfore Railway Station. In accordance with Part I of the Planning and Development Act, a protected structure includes any other structures lying within the curtilage of that structure. In the case of Farranfore Railway Station, this includes the railway station building, signal box, stone outbuilding, cast iron pedestrian bridge, goods shed and limestone ashlar water tower. The bridge at Gearha, Farranfore (the O'Connell Bridge) at the bridge at Inchinveema/Urrhogal (Maine Bridge), are existing protected structures (reference numbers 48-3 (21304803) and 48-7 (21304807)).
Recommendations		
No proposed amendments.		

Chapter 9 – Economic Development

Chapter 9 – Economic Development Introduction, Economic Resilience, Policy Context and Sustainable Economic Development and Climate Action		
	Submission Summaries	CE Response and Recommendation
KE-C1-111 Mol Teic (t/a Dingle Hub)	<ol style="list-style-type: none"> 1. diversification of the job base in the county should be named as a specific objective. 2. a sustained programme should be produced, in conjunction with Kerry Education and Training Board, Munster Technological University, University College Cork and other higher education institutions in the region, to develop, in the communities, some of the skills that will be important in the future This requirement for diversification is also noted in the Kerry Local Economic and Community Plan (2016-2021). <p>Recommendation 2: To support the growth of a ‘sustainable and strong economy’, it is recommended that the Council should commit to creating and supporting a county-wide ecosystem of innovation and a series of local ‘networks’ (of sectoral interests) at local community level, as these can assist in developing a sustainable pipeline of future companies, jobs and incomes.</p> <p>Recommendation 4: Electric Vehicles (EVs) - A suitable sustainable transport infrastructure should be prioritised as a matter of urgency and installed across the county (including a suitable public electric vehicle charging infrastructure and electric vehicle charging in tourist accommodation that can facilitate the simultaneous charging of multiple vehicles). This infrastructure should be capable of accommodating not only local commuters but also the significant number of tourists that visit the county each year.</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.</p> <p>Furthermore, the plan supports the COVID 19 Economic Recovery Plan and the associated pillars for economic growth which are focused on modernising, extending and diversifying the County’s economic base.</p> <p>Kerry through the Economic Stakeholders Forum, Kerry Scitech, the Kerry Hubs Network, the Kerry Tourism Industry Federation has established networks to engage across the various sectors in the county. A number of sub-groups have been agreed under the Economic Stakeholders Forum to concentrate on the second site strategy, digital strategy and climate action. In this context we will examine the potential of an innovation network. The Development Plan actively implements and supports national and regional policy on innovation and enterprise.</p> <p>The rollout of Electric Vehicle (EV) infrastructure will be outlined in the Electric Vehicle Charging Infrastructure Strategy 2022-2025.</p>

<p>KE-C1-261 Ballylongford Enterprise Association</p>	<p>This submission raises the issue of population decline in Ballylongford and states that Kerry County Council need to have a balanced Regional Economic Development Plan which needs to include the Shannon Integrated Framework Plan.</p>	<p>S9.6.1.1 deals with the Shannon estuary area. The plan seeks to provide and promote a balanced regional economic development plan which includes the Shannon Integration Framework Plan</p> <p>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 out in the SIFP for the Shannon Estuary in addition to marketing and seeking of financial and expert support.</p> <p>Furthermore, the plan support the COVID Economic 19 Economic recovery plan and the associated pillars for economic growth which are focused on modernising, extending and diversifying the County's economic base is also applicable.</p>
<p>KE-C1-186 Eamonn Sayers</p> <p>KE-C1-185 Eamonn Sayers</p>	<p>The submission states that the development of an active network of support among Kerry's businesses would enhance prosperity through co-operation, knowledge sharing, creativity, inspiration and a stronger entrepreneurial ecosystem. The submission gives the example of the Guinness Enterprise Centre.</p> <p>The submission states given that Guinness Enterprise Centre and KerrySciTech are the original founders of The Kerry Hub Network that it should be included in the listing as it is a member of The Kerry Hub Network.</p>	<p>KCC in its role as a Local Authority and Local Enterprise Office already actively coordinates and supports (practical, advisory and financial supports) local groups such as business and various community groups. KCC through its Development Plan actively implements and supports national and regional policy on innovation and enterprise. In addition the Council has supported the development of Kerry Scitech (Industry cluster), various chamber alliances, the chamber network and convenes cross-sectoral agencies and businesses through the economic stakeholders forum.</p> <p>Additional text will be included to make reference to the Guinness Enterprise Centre and KerrySciTech</p>
<p>KE-C1-165 Kate Carmody</p>	<p>-Link the rural economy of North Kerry to the Ballylongford landbank with the Shannon Estuary</p>	<p>The Ballylongford Landbank and the Shannon Estuary are seen as assets and potential for the entire North Kerry Region</p>
<p>KE-C1-363 NEWKD</p>	<p>This submission requests inclusion of wording to Objectives KCDP 9-3 and KCDP 9-48.</p>	<p>The submission is noted Recommendation: Include the following to KCDP 9-3: Facilitate and support Training, upskilling and employment opportunities for rural communities in areas such as renewable energy, sustainable tourism, energy retrofitting, the Bioeconomy and the Circular Economy.</p>

KE-C1-171 Asdee Community Development Association	The submission seeks that the Plan will provide a proactive and supportive framework and impetus for the full delivery of the Asdee Socio-Economic Development Plan 2020-2025.	The submission is noted Recommendation: The following additional text will be included in the plan; “ The Council will continue to work with local communities to advance the Socio-Economic development proposals ” It is not appropriate to identify individual villages within the plan.
KE-C1-199 Dingle Business Chamber	The submission seeks that the fund collected on the Dingle Peninsula is ring fenced for the area and leveraged with the RRDF funding to lead transformative projects in the area.	The allocation of funds is not an appropriate function of the county development plan.
KE-C1-386 Circular Bioeconomy Cluster South- West	<p>This submission supports the draft plan and the recognition that there is significant potential in the bio-economy and circular economy in Kerry. Through our activities we can also attest to the positive contributions the circular bioeconomy has on the economic and social vibrancy of our rural communities.</p> <p>Policy KCDP 9-3 is welcomed which states Kerry County Council will facilitate and support employment opportunities for rural communities in the Bioeconomy and the Circular Economy.</p> <p>Policy KCDP 9-68 is welcomed which supports the continued sustainable expansion and diversification of the forestry sector.</p> <p>Policy KCDP 9-72 is welcomed which supports and promotes the sustainable development of the marine and aquaculture sectors.</p>	Noted and the support is welcomed.
KE-C1-165 Kate Carmody	-"We could create a bioeconomy hub which would benefit all members of the community. A bioeconomy hub could contain the following: A community anaerobic digester supplying heat to a district heating system. A biorefinery and a decorticating plant for industrial crops such as hemp, flax, thistles and similar crops. This would support a bio-gas industry.	The points in the submission are welcomed and Kerry County Council are happy to engage with any community groups or individuals in relation to the provision of bioenergy.
KE-C1-111 Mol Teic (t/a Dingle Hub)	<p>That consideration be given to including some other important factors that help define the ‘health of the economy’, such as the following:</p> <ol style="list-style-type: none"> 1. Creating antecedent conditions in local communities, developed around key thematic pillars, such as Sustainability and Climate Adaptation; Digitalisation; etc. 1. The importance of developing (in local communities, businesses and agriculture sector) an ongoing capability and capacity for innovation, as this will be required to support the transition to low carbon, digitalisation and the general upskilling of the communities in order to avail of future economic opportunities. 	<p>The pillars for Economic Growth developed in the Multi-agency Covid-19 Economic Recovery Plan 2021 are merged into the County Development Plan set out hereunder strongly reflect the sentiments contained in the submission and mirror the thematic pillars</p> <p style="text-align: center;">Nine Pillars for Economic Growth</p> <p>(Transition to a Low carbon economy, Education and Training ,Transition to a Digital Economy ,Marketing Kerry, Regeneration of our Towns and Villages, Enterprise Development & Business Support, Tourism/ Culture /Amenities and heritage, Kerry’s Natural Resources, Enhanced Regional Connectivity and Infrastructure)</p>
KE-C1-111 Mol Teic (t/a Dingle Hub)	The Council’s commitment is noted to: “Sustainably support economic development to ensure that it does not contribute to coastal erosion or have a negative impact on areas vulnerable to flood risk”.	Point noted. The Council’s experience of working with the Maharees Conservation Association is directly acknowledged through the Local Authority’s commitment to continue to work with and support this and other groups as evidenced in objectives KCDP 11-6 and 11-9 of the Draft

	It is recommended that the experience of the Maharees Conservation Association be considered for reference in the Plan, as they have a very good track record of working well with Kerry County Council and other public bodies.	County Plan as detailed in response given to KE-C1-111 Mol Teic (t/a Dingle Hub) and the recommendation included under Chapter 11 – Environment
KE-C1-199 Dingle Business Chamber	The submission seeks urgent support for sustainable fishing and farming communities in Dingle and the Dingle Peninsula.	The County Development Plan recognises the importance of both the fishing and farming identity to the economy of the county and the extension of these sectors through both diversification or value added initiatives.
KE-C1-111 Mol Teic (t/a Dingle Hub)	<p>Specific references be included in the Plan <i>‘to support entrepreneurship and the creation of new businesses; the expansion of existing businesses; investment in research and development by businesses; and the development of intellectual property by businesses, possibly in conjunction with researchers in research centres and/or higher education institutes.’</i></p> <p>It is recommended that consideration be given to the importance of supporting entrepreneurship and the creation of new companies (which is essential for long-term sustainable development) and the importance of creating a county-wide system of innovation that extends into all communities and supports those communities to continually adapt and upskill and increasing the use of multiple income streams as opposed to having one job (e.g., in the case of farmers, tourist accommodation providers, etc.).</p> <p>While very supportive of KCDP 9-13, it is recommended that it is contextualised by noting that there is also a requirement to diversify the jobs and business base across the county.</p>	<p>The contents of the submission are note and the following amendment is proposed</p> <p>KCDP 9-4 reads as follows;</p> <p>“Facilitate and support County Kerry’s economic recovery through the sustainable implementation of County Kerry’s COVID-19 Economic Recovery Plan and the emerging Kerry Local Economic and Community Plan, focusing on a transition to a low carbon and digital economy [assisted by the encouragement of Smart Villages] and through sustainably expanding the county’s economic sectors, increasing innovation, product exports and access to new markets.”</p> <p>To now read as</p> <p>“through sustainably expanding the county’s economic sectors, increasing innovation and research, supporting entrepreneurship, the creation of new and expansion of existing businesses, product exports, access to new markets and the development of intellectual property in conjunction with the higher education sector and research centres.”</p> <p>KCDP-13 supports the recovery of the tourism sector and is only one of a series of objectives from KCDP 9-4 to KCDP 9-14 and it is considered in this context that the need for additional economic sectors and diversification is already clear</p>
KE-C1-111 Mol Teic (t/a Dingle Hub)	The Dingle Hub has developed a model for developing sectoral plans for addressing the transition of different sectors and it is recommended that this concept be incorporated into the Development Plan.	The plan acknowledges the development role of the Educational sector and research centres in the county and their role in transitioning the county through the emerging sectors. The Covid 19-ERP details many of the initiatives.
KE-C1-127 Farranfore Development Association	Support the development and completion of the 4 Park business park -Work with local business community of Farranfore, including 4 Park, Kerry Airport & Kerry Group as to how Farranfore can attract new enterprises as well as raise general public awareness as to the services and business offering available within the Farranfore area	The 4 Park Business Park is under the remit of the Killarney Municipal District Local Area Plan with the plan stating “There is significant potential to expand on the employment and economic opportunities for the settlement. 4 Park Business Park located north of the railway crossing on the northern edge of the village forms part of a larger unfinished development”.

Recommendations

At 9.4.2 insert text; The Council supports the economic role and potential of the established towns of Listowel, Abbeyfeale, Newcastle West and Kilrush as economic drivers in a potential North Kerry/West Limerick/Clare network connected with the Shannon Estuary. This includes the Shannon Integrated Framework Plan (SIFP) area and strategic locations identified under the SIFP as a Shannon Estuary Coastal Network which includes the Tarbert/Ballylongford Landbank. **Opportunities exist to further develop connections, collaborations and innovative projects between these areas which are supported by the Plan.**

At 9.6.1.1 insert text ; The Shannon Integrated Framework Plan (SIFP) is a land and marine based framework plan to guide future development of the Shannon Estuary. It has identified 9 no. strategic development locations in counties Clare, Limerick and Kerry and aims to build on existing industry connectivity and synergy as well as the existing infrastructure to create a more sustainable and attractive network for further investment. 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. **This area is viewed as a driver for economic growth within the County and Region. There is potential for innovative projects, collaboration between stakeholders and sectors, infrastructure projects to/ from and within the network to unlock the strengths and opportunities for the area.**

Additional text will be included to make reference to the **Guinness Enterprise Centre and KerrySciTech**

Include the following to KCDP 9-3: Facilitate and support **Training, upskilling and** employment opportunities for rural communities in areas such as renewable energy, sustainable tourism, energy retrofitting, the Bioeconomy and the Circular Economy.

The following additional text will be included in the plan; “ **The Council will continue to work with local communities to advance the Socio-Economic development proposals**”

KCDP 9-4 reads as follows;

“Facilitate and support County Kerry’s economic recovery through the sustainable implementation of County Kerry’s COVID-19 Economic Recovery Plan and the emerging Kerry Local Economic and Community Plan, focusing on a transition to a low carbon and digital economy [assisted by the encouragement of Smart Villages] and through **sustainably expanding the county’s economic sectors, increasing innovation, product exports and access to new markets.**”

To now read as

“**through sustainably expanding the county’s economic sectors, increasing innovation and research, supporting entrepreneurship, the creation of new and expansion of existing businesses, product exports, access to new markets and the development of intellectual property in conjunction with the higher education sector and research centres.**”

Chapter 9 – Economic Development		
Economic Regions of Regional Economic Significance		
	Submission Summaries	CE Response and Recommendation
KE-C1-358 Cllr. Breandán Fitzgerald	The submission states that the Covid-19 pandemic has shown that there is an over reliance on tourism within the county and that further inward investment in alternative jobs and industries must be developed.	There are several objectives contained within the Draft Plan in relation to enhancing economic development within the county. Whilst tourism is a key economic driver within the county it is acknowledged that several other industries and services providers are large employers within the county. The County development plan and the associated Covid 19 ERP details the opportunities for diversification and extending economic activity across the pillars of Economic Recovery & Growth and also the report from the Employment Creation and Retention working Group.

<p>KE-C1-111 Mol Teic (t/a Dingle Hub)</p>	<p>It is requested that a study should be undertaken, which can inform the Council's policy and the Development Plan, on how best to balance the tourism needs and aspirations with the broader more diversified economic development of the area, so as to ensure that there is sufficient, suitable accommodation and housing for those wishing to live and work in Dingle Town (and its environs) and there is a wider business and employment base, rather than having an over-dependence on tourism.</p>	<p>There is a significant quantum of zoned land in Dingle town to cater for the current and anticipated housing demand over the lifetime of the plan. It is the stated policy of the Local Authority outlined in Section 10.3.5.3 of the Development Plan to maintain established and newly constructed residential areas as places of permanent residential occupation by owner/occupiers and/or long-term tenants. Chapter 9+10 contain a range of policies and objectives to encourage diversification into differing economic sectors and reduce over reliance on tourism</p>
<p>KE-C1-297 Dingle Peninsula Tourism Alliance</p>	<p>The submissions states that due to the scale of Airbnb lets in Dingle town and on the peninsula, local families and businesses requiring staff accommodation cannot get long-term rentals. Positive steps should be taken asap to ensure balance in the local social community structures and prevent the loss of local families in the region, weakening local communities leading to a loss in the Irish language and local cultural heritage. This will be extremely damaging to the overall visitor experience as a result.; and there is no mention of unregistered accommodation numbers in this plan.</p>	<p>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.</p>
<p>KE-C1-134 John Fox</p>	<p>The submission states that a strategy should be put in place that puts people front and centre of any CDP as this will greatly assist the drive towards recovery from Covid-19. A strategy that seeks to put in place the conditions that encourages employment opportunities, will also benefit Communities through 'spending power' and confidence in the future.</p>	<p>The county development plan recognizes the challenges faced by the economy that have arose due to Covid-19 pandemic. In chapter 9.0 Economic Development and particularly under subsection 9.1.1 Economic Resilience there is multiple references to the steps that have been taken County wide to assist in the recovery from the economic pressures that have been created by the Covid-19 pandemic.one such measure is referred to under 9.2.3.1.2 County Kerry's COVID-19 Economic Recovery Plan 2021 which is a non-statutory plan which at its core forms 9 pillars of economic recovery & resilience which has been integrated through the county development plan. This draft plan aims to provide a spatial land-use planning framework that demonstrates Kerry's ability to adapt and react to these dual economic challenges.</p>
<p>KE-C1-107 John O'Sullivan</p>	<p>The submission states that the following paragraphs should be excluded from the CDP:</p>	<p>The submission is noted regarding reference to various national, regional plans and strategies adopted by Kerry County Council.</p>

	<p>"The primary/natural resource base offers many opportunities for diverse enterprise development, renewable energy production as well as tourism, leisure and recreational development. "</p> <p>despite KCC best hopes and wishes, Renewable energy production and tourism are mutually exclusive in the same area. KCC needs to refer to the published ITIC report on the impact of wind farms on tourism.</p> <p>"As Kerry is largely a rural County, there are opportunities to broaden the rural economy of the County by promoting small-scale retail services in the countryside that will not have a significant impact on retailing in the larger centres. Local village shops, small scale tourist related retail and farm shops ancillary to farm complexes will be considered in a rural location, where they do not have an impact on adjacent villages. "</p> <p>"pop up shops" or "car boot sales" as suggested above will not do an iota to improve the rural economy. This level of ambition for the county is not adequate.</p>	<p>It must be noted this is very detailed submission that would not be possible to summarise it fully as it includes numerous separate and specific suggestions for new objectives or amendments to existing objectives. The reader is therefore advised to read the submission in full.</p> <p>In the drafting of this plan, full regard has indeed been taken of all national and regional guidelines/strategies and full cognisance's given to the development plans of adjoining counties, but a significant challenge has arisen due to the fact that some development plans are currently under review.</p> <p>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>KE-C1-87 Pat Carey</p>	<p>The submission raises concerns over the exclusion of most of Kerry particularly the North of Kerry and the potential this has to further depopulate the rest of the county which will lead to an imbalance in development around the county and the potential loss of services that may arise from this.</p>	<p>The designation of Regions of Regional Economic Significance identified through the RSES and NPF in Kerry include the Atlantic Economic Corridor, Kerry hub & Kerry Knowledge Triangle and the Shannon Integrated Framework Plan/Shannon Estuary Coastal Network. The identification of these areas in no way undermines the economic activity of other areas of the County but rather supports the development of the entire county. The economic activity is best achieved through research across the county through established and emerging research centres and networks (the Agritech centre of excellence, the RDI hub Killorglin , The wider Hub networks, the work of MolTeic in Dingle)and other initiatives . The Covid 19 ECR plan identifies opportunities for further diversification of the economy and supports the regeneration of towns and villages throughout the county.</p>
<p>KE-C1-381 North Kerry Football Board</p> <p>KE-C1-134 John Fox</p>	<p>This submission seeks greater economic regional balance for the county with pressure put on State Agencies to get Industrialists and Foreign Direct Investment (FDI) to establish their Operations in Kerry subject to Proper Planning and Sustainable Development. The submission also states that North Kerry has been neglected over many years to the extent that the current Government have pledged to set-up an 'Exchequer-Funded' "Task Force to address the oversight as a matter of urgency. Also states that long commuting has a negative impact on the environment and work/life balance and states it is better to bring the Jobs to the workers.</p>	<p>Chapter 9 Economic development sets out the councils' policies and objectives the purpose of which is to support the economic development of the entire county. The County development plan in its remit as a land use planning framework sets the groundwork to enables economic development through the various policies and land use zonings throughout the county plan. As it is not within the remit of the county development plan or the planning department to seek Foreign Direct Investment (FDI) but rather create the environment to which would attract (FDI). The planning department and the Council as a whole will</p>

		<p>continue to engage with such bodies as the IDA. The council recognizes the issues that can be caused by long commuting times and how this can affect work/life balance as well as the wider environmental impact that can arise. This plan seeks to continue to address these issues with the various policies contained in the plan.</p> <p>Kerry County Council supports the economic role and potential of the established towns of Listowel, and the remainder of the North Kerry/West Limerick/Shannon Estuary/Clare Settlement Network.</p>
<p>KE-C1-380 MARTIN MULVIHILL</p> <p>KE-C1-171 Asdee Community Development Association</p>	<p>The submission welcomes the inclusion of Asdee in the Shannon Estuary Coastal Network and the potential this designation may offer in terms of an investment focus and the potential for better connectivity and seeks consultation with all the communities and stakeholders. It further seeks broadening out the scope of the policy objectives for the Shannon Estuary to ensure sustainable development and benefits to the local community, with investment in local infrastructure, including housing and carrying capacity.</p>	<p>The support outlined is welcomed. Sustainable development is a key facet of the Draft Plan, including connectivity [Infrastructure and digital] with a focus on the development of existing towns and villages, such as Asdee. Chapter 4 outlines the vision, aims and policies for the development of Towns and Villages, in tandem with Chapter 9 Economic Development.</p>
<p>Recommendations</p> <p>No proposed amendments.</p>		

	<p>Chapter 9 – Economic Development Economic Regions of Regional Economic Significance - Kerry Hub & Knowledge Triangle</p>	
	Submission Summaries	CE Response and Recommendation
<p>KE-C1-173 Milltown Community and Chamber Alliance</p>	<p>The submission states that Milltown is located in the area defined as the ‘Kerry Hub and Knowledge Triangle’ and there is no local evidence of this having conferred any benefits on the community. Indeed, it has had negative implications in respect of housing pressures and an increase in car-dependent commuting.</p>	<p>The ‘Kerry Hub and Knowledge Triangle’ is an innovative economic hub within the established network of Killorglin, Tralee, Killarney and the Atlantic Economic Corridor. The aim of the Local Authority is to facilitate the sustainable economic development of this area which will require sustainable development of housing, infrastructure and services. There are several objectives in the Draft Plan relating to the development of the KHKT including Objective KCDP 9-8.</p> <p>The Kerry Hub & Knowledge Triangle has been strengthened in recent years with the establishment of the Munster Technological University.</p>

		<p>The development of Milltown and the growth in population has occurred over the past 10 years and much of same preceded the designation of the Kerry Hub and Knowledge Triangle. The consolidation of the town and the realisation of its full potential will be dealt with masterplan funding, recently allocated to the town</p> <p>The Council will work with the local community organisations in advancing same.</p>
<p>KE-C1-219 Aidan Linnane</p>	<p>At present the Kerry hub and knowledge triangle is located between Killorglin, Killarney and Tralee. I believe this zone should be extended to include Listowel and Castleisland, in the interest of introducing new businesses and employment opportunities into these deprived areas.</p>	<p>The Kerry Hub and Knowledge Triangle will have economic links to North Kerry, the Shannon Estuary and through the Hub Network throughout the County. The Economic Objectives within the County development plan and Covid 19 ERP extend throughout the county.</p>
<p>KE-C1-336 jimmy Moloney</p>	<p>The rationale of the " Knowledge Triangle" needs to be explored more. What are the impacts for rest of the county not included in this area?</p>	<p>As outlined in previous submissions three areas of economic co-operation or significance are identified in the RSES and these include the Shannon Estuary and associated towns, the Atlantic Economic Corridor and the Kerry Hub & Knowledge Triangle. Identifying areas of economic influence strengthen the economic development of the entire County. The economic objectives of the development plan and the associated Economic Recovery Plan apply to the entire County.</p>
<p>KE-C1-215 Shannon Rangers KE-C1-212 Ballylongford GAA Club</p>	<p>The submission requests that Kerry County Council set up the Shannon Estuary Coastal Network to function as a countermeasure to the Kerry Hub & Knowledge Triangle. The submission states that if this Network is not established before the adoption of the new County Development Plan that The Kerry Hub & Knowledge Triangle will develop at a rate that is detrimental to North Kerry and further marginalise the residents, ratepayers and taxpayers of North Kerry.</p>	<p>The North Kerry/West Limerick/Shannon Estuary/Clare Settlement Network is set out in Section 3.5.1.4 of the Draft Plan, where the Council supports the economic role and potential of the established town of Listowel and adjoining settlements as economic drivers in a potential North Kerry/West Limerick/Clare network connected with the Shannon Estuary. This includes the Shannon Integrated Framework Plan (SIFP) area and strategic locations identified under the SIFP as a Shannon Estuary Coastal Network.</p>
<p>KE-C1-312 Dromclough NS</p>	<p>The submission states that Listowel should be an integral component of the Kerry Hub & Knowledge Triangle – not just "supporting" it. The word "supporting" should be removed in this respect from the plan and the plan revised to extend the "Kerry Hub and Knowledge Triangle" to Listowel, with Listowel being the apex of the triangle, while still including Tralee.</p>	<p>Listowel is classified as a regional town in the settlement hierarchy, it cannot be classified as a key town as it would be contrary to the settlement typology as set out in the NPF and RSES. The KHKT is a regional geographical area recognised in the RSES centring on the three towns of Tralee, Killarney and Killorglin. Similarly the RSES recognises the importance of the Shannon Estuary and the towns and communities influence by this. This is described as the North Kerry/West Limerick/Shannon Estuary/Clare Settlement Network. The Council supports the economic role and potential of Listowel and adjoining towns. The North Kerry Settlement Network is intrinsically, economically and geographically linked to the west Limerick/Shannon area. The RSES</p>

		<p>Strategy Map (see fig 1.6) is supported by the Core Strategy map (fig 3.1) which seeks to achieve balanced regional development through enhanced regional connectivity with an emphasis on the Key Towns.</p>
<p>KE-C1-111 Mol Teic (t/a Dingle Hub)</p>	<p>It is recommended that some provision should be included in the Development Plan that specifies strong linkages between the Knowledge Triangle and other Hubs in County Kerry, with some provisions for a tiering system of support to businesses across the county through the local Hubs to the County and Regional Hubs.</p> <p>With an importance in the Plan attached to the Knowledge Triangle, centred on the three towns of Tralee, Killarney and Killorglin, it is recommended:</p> <p>That a particular emphasis be placed on the development of a high-quality public transport service connecting the three towns (and Milltown, which is the fastest growing town in County Kerry), thereby facilitating the commuters in these towns to affect a modal shift, by initially not requiring second cars in their households; and</p> <p>It is recommended that the role of Kerry Education and Training Board should be specifically mentioned in the Development Plan, as it spans primary, secondary and further education and training, together with Youth and Music.</p>	<p>The Kerry Hub Network is comprised of a number of well-established and quality enterprise hubs. These include a mix of public and privately funded enterprise hubs, with a geographical spread throughout the County.</p> <p>It is a strategic aim of this Development Plan to co-ordinate transport and land use planning. The NIFTI is a high-level strategic framework for prioritising future investment in the land transport network. Reference to the NIFTI is made under section 14.3 Sustainable Transport of the Draft CDP.</p> <p>Objectives 14-5 & 14-6 clearly set out the Council’s intention to specify baseline figures and targets for modal share in new / varied Local Area Plans to encourage a modal shift away from the private car to more sustainable forms of transport, such as public transport, cycling and walking and 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>Public transport service development is not within the remit of the County Development Plan. However, land use planning is, therefore the CDP seeks to deliver compact growth therefore facilitating the potential for more efficient public transport planning.</p> <p>The Council acknowledges the role of Kerry Education and Training Board, as it spans primary, secondary and further education and training, together with Youth and Music. The Kerry Education and Training Board (ETB) seeks to promote lifelong learning society in Kerry, it is therefore recommended that the objective be amended to include a reference to the KEB as follows: KCDP 9-6_“Engage and collaborate with Regional Partners, Local Authorities, Third Level Education Sector <i>and the Kerry Education and Training Board</i> 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>It is recommended that the word “maximise” be replaced with “optimise” KCDP 9-9.</p> <p>It is recommended that consideration be given not just to training in ‘traditional forms of employment’ but that training be provided in some of the skills that will be required in the future, as many of the jobs that will exist in ten years’ time do not exist today.</p> <p>It is recommended that the emphasis be changed in this objective from ‘facilitate and support reskilling and retraining as opportunities arise’ to ‘Identify the needs for upskilling, reskilling and retraining with the transition to low carbon economy and ensure that sufficient number of skilled people are available in advance to avail of the opportunities.’</p> <p>It is recommended that local communities should be encouraged to participate in Engaged Research with universities and research centres.</p> <p>It is recommended that the importance of ‘research, upskilling and reskilling’ is carried through the whole of the Development Plan and referenced in other areas as well. It is very important for developing a sustainable economy; and all businesses (including farmers) should be encouraged to engage, on an ongoing basis, with relevant research.</p>	<p>It is recommended that the word “maximise” be replaced with “optimise”. KCDP 9-9: “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>The statement set out in the development plan does not limit training to traditional forms of employment rather it states people would benefit by the provision of training and skills development and this can take any form, it is not restricted to traditional skills and training.</p> <p>The Covid 19 ERP sets out in detail the training opportunities and new and emerging industries and should be read in conjunction with the CDP.</p> <p>The council acknowledges the importance of ‘research, upskilling and reskilling’ in all sectors, in order to promote the development of a sustainable economy; all businesses (including farmers) should be encouraged to engage, on an ongoing basis, with relevant research.</p> <p>“The Council recognises the importance of the link between industry and higher education in providing for the economic and social wellbeing of the County’s population. The development of a knowledge-based economy is dependent on a large number of sectors interacting in a focused manner to achieve the conditions for growth.”</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. There are significant references to training and upskilling throughout the Plan & the associated Economic Recovery Plan.</p>
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Recommendations

Amend KCDP 9-6_“Engage and collaborate with Regional Partners, Local Authorities, Third Level Education Sector **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.”

It is recommended that the word “maximise” be replaced with “optimise”. KCDP 9-9: “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.”

Chapter 9 – Economic Development		
Employment Profile and Land Use Planning for Economic Development		
	Submission Summaries	CE Response and Recommendation
KE-C1-171 Asdee Community Development Association	The submission states that the Plan needs to present a more accurate picture of the significance of agriculture – directly and indirectly. It further states that Page 68 wrongly asserts that Kerry has ‘relatively low agricultural employment figures’ when in fact the county has the eight-highest proportion of persons working in the primary sector, and sustaining these jobs is vital for our county, especially North Kerry and their value needs to be recognised and supported throughout the plan.	<p>The text sought to highlight that the numbers employed in agriculture have declined and there was a corresponding need for farm diversification and new employment opportunities to sustain the rural economy. Primary agricultural employment remains a very important sector in the economy of the county and the text will reflect this.</p> <p>The following amendments are proposed Remove the word “only” which precedes 8% on page 68 Replace the text “given the relatively low agricultural employment figures” – with – “Agriculture and fishing remain important employment and economic sectors for the county. In order to sustain and strengthen the employment base in rural communities....”</p>
KE-C1-199 Dingle Business Chamber	The submission seeks the formulation of a job’s incentive scheme for rural towns to sustain community life and rural living.	This is outside the remit of the county development plan
KE-C1-111 Mol Teic (t/a Dingle Hub)	<p>It is recommended that:</p> <ol style="list-style-type: none"> 1. a series of future possible Employment Profiles be published for the county, based on the likely implementation of the Development Plan and other strategies. That would help to: 1. give greater focus to the overall future plans; 2. bring greater clarity to how specific proposals would align with the plans; 3. assist with Local Area Plans; development of Education and Skills planning for the county; and 4. help monitor implementation of the Development Plan; 	<p>The points raised above are noted .</p> <p>KCC are currently preparing additional Socio-economic profiles for the county, including Powskar Data which will assist in this area. There has been strong alignment between the county development plan/Covid Economic RecoveryPlan/Tourism Strategy and LECP</p>
KE-C1-20 Donard deCogan	This submission requests that part of the Fort Shannon site - Ardmore Point on the western side which is not currently part of the Special Area of Conservation and is proposed to be zoned for industrial development is reconsidered to ensure that the integrity of the entire ensemble is maintained.	See submission KE-C1-365, and recommendation where it is proposed to remove the site from the C5 industrial zoning.

KE-C1-382 The Kerry Food Hub	The submission states that the Firies area will require scope for additional Commercial development.	The zoning of lands within Firies is contained within the Killarney Municipal District Local Area Plan and therefore it outside of the scope of the Kerry County Development Plan 2022-2028. In any case there are lands zoned within the development boundary of Firies for commercial development.
KE-C1-111 Mol Teic (t/a Dingle Hub)	It is recommended that the Plan should be amended (and a specific objective should be included) to read: “The timely availability of advanced infrastructure (including electricity infrastructure) is critical to ensure the competitiveness of businesses; for future economic activity; and to attract and retain businesses.”	<p>The various chapters of the Development Plan already include numerous specific objectives to develop and or support and facilitate the development of various critical infrastructure necessary for the sustainable development of the County. The Local Authority is dependent on several outside agencies to deliver some critical infrastructure including Irish Water, TII and ESB and can only support and facilitate those agencies in their work.</p> <p>The objective is included under the various infrastructural chapters of the plan.</p>

Recommendations

Remove the word “only” which precedes 8% on page 68

Replace the text “given the relatively low agricultural employment figures” – with – “Agriculture and fishing remain important employment and economic sectors for the county. In order to sustain and strengthen the employment base in rural communities....”

Chapter 9 – Economic Development Economic Sectors and Opportunities		
	Submission Summaries	CE Response and Recommendation
KE-C1-188 Tralee Chamber Alliance	The submission states that the plan must recognise the significance of the ‘knowledge infrastructure’ to Tralee, and to facilitate through infrastructure, student accommodation, access and development; greater social, employment and educational inclusion between Clash/Dromtacker and the town centre that will facilitate a University Town programme premised on synergy between education, research and the local economy.	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 physical presence in the town centre. The provision of further student accommodation in vacant and underused upper floors will be welcomed and facilitated on a case by case basis.
KE-C1-111 Mol Teic (t/a Dingle Hub)	<p>The submission suggests the following:</p> <ol style="list-style-type: none"> 1. KCDP 9-32 should be amended to read ‘the strong link between a well-educated workforce (and local community) and economic prosperity’; and 2. KCDP 9-33 should be amended to include ‘life-wide learning’ as well as ‘life-long learning’. 	<p>The submission is noted</p> <p>Amend KCDP 9-32 to include an active local community</p> <p>Amend KCDP 9-33 to include Life wide learning.</p>

	<p>It is recommended that the Development Plan should be clear that the district towns, villages and countryside would not only be capable of supporting “traditional employment attached to resource-based activities such as agriculture, forestry, marine activity, aquaculture, mineral extraction, energy and hugely significantly tourism and recreation is very important” but would also be suitable for supporting businesses in the Knowledge Economy.</p>	<p>It is recommended to include reference to the Knowledge Economy in Section 9.7.3. and hugely significantly tourism, recreation and <i>Knowledge Economy</i> is very important.</p>
<p>KE-C1-173 Milltown Community and Chamber Alliance</p> <p>KE-C1-381 North Kerry Football Board</p> <p>KE-C1-391 Cahersiveen Community and Business Alliance</p>	<p>The submission states that Chapter 9 needs to be more promotive in respect of the importance of agriculture and its current and future roles in Kerry’s economic development. The chapter places more emphasis on digital hubs than on farming, although even in 2028, the latter will be a larger employer, both directly and indirectly, in the county.</p>	<p>Kerry County Council recognise the importance the Agricultural sector and the major contribution it makes to the Kerry Economy. In Recognising this the policies contained in the plan while focusing on the “ Sustainability of Agriculture, the Marine and Forestry “also seek opportunities to strengthen employment opportunities in these areas. These are outlined in detail in objective KCDP 9-34, KCDP 9-37, KCDP 9-39, KCDP 9-34, KCDP 9-41, KCDP 9-42. Objective KCDP 9-43 does recognise and support the concept of research-“ Facilitate and support community innovation hubs, digital hubs, food hubs, start-ups and centres of excellence (with particular opportunities for innovation in agri-food, agri-tech, marine research, creative industries, knowledge economy etc.) as local drivers for growth. This objective in realising additional opportunities for economic growth supports rural economic activity and strengthening the Agricultural Sector.</p> <p>Kerry County Council are supportive of rural businesses and incentives are in place to promote such activities, for example through the Local Enterprise Office. The Financial structures are outside the remit of the CDP</p> <p>The Draft Plan supports rural economies through support for diversification in agri-tech and agri-food as outlined in Section 9.7.6 - [KCDP 55 to KCDP 60] and the protection of agricultural land [KCDP 9-59- KCDP 9-56].</p>
<p>KE-C1-111 Mol Teic (t/a Dingle Hub)</p>	<p><u>Transition of the agriculture sector</u> <u>It is recommended</u> that the Development Plan should reference and draw on the experience of the Dingle Hub:</p> <ol style="list-style-type: none"> 1. working with local farmers, Teagasc, Kerry Group and a local Internet of Things (IoT) company, Net Feasa, 2. working with the West Kerry Farmers’ Sustainable Energy Community (WKFSEC) to reduce the energy usage on their farms; <p>That the Council consider commissioning a suitable Internet of Things Wide Area Network (e.g LORA WAN or Narrowband IoT or similar) at could support the use of IoT in agriculture, environment, water and asset monitoring across the county.</p>	<p>The Council’s support for “the further development of remote/blended working in co-working hubs” is noted and that the Hub is willing to support the Council by sharing its experiences in these areas, if requested.</p> <p>The point made is noted however this is a strategic land use plan and the recommended made is beyond the remit of this Development Plan. Council is undertaking a Digital strategy for the county in association with key stakeholders which will help explore this area. There is a commitment within the Economic Stakeholders Forum to establish a network to advance the digital opportunities and can be considered in that context.</p>

	<p>Noting the objective, “to support and facilitate the thematic objectives outlined in ‘Our Rural Futures’, Rural Development Policy 2021-2025’, to strengthen economic activity and employment in rural areas”, it is recommended that local Hubs are given a role to create and support networks of interest (e.g farmers interested in using new technologies, creative artists, remote workers who may wish to engage with others etc.) and this happens best at local community level.</p>	<p>It is recommended that the Development Plan be amended to include the following 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>KE-C1-320 Harmony Solar Ireland Limited</p>	<p>The submission states that new developments should be assessed on a case-by-case basis, recognising that there is a necessity in some instances for larger scale solar developments to be fragmented across a large site area on account of ecological considerations, access requirements, land suitability, residential amenity considerations and land availability. Thus, request that Objective KCDP 9-51 be amended as follows: “Protect good quality agricultural lands from large scale development (With the exception of Solar PV developments) which could be accommodated elsewhere and that would undermine the future agricultural productivity of the lands or irreversibly harm the commercial viability of existing or adjoining agricultural land.”</p>	<p>It is not considered necessary to amend the objective as each development proposal for solar energy is assessed on its own merits, in line with proper planning and sustainable development.</p>
<p>KE-C1-80 Kerry IFA</p>	<p>The submissions makes the following comments and observations;</p> <p>-Kerry IFA would strongly argue that there should be no difference taken into account between Full time or Part time farmers, themselves or their family, seeking planning permission to build a house on their lands in line with normal planning requirements.</p> <p>-IFA requests that landowners should retain the right to sell a site should they need/want to and request that more consultation should take place between the planning Officers and prospective applicants prior to application for planning permission.</p> <p>Rural Enterprise & Business Start Ups; -Farmers, who wish to start a Rural Business on their farms, should be looked at more favorable by the local Authority when planning issues arise</p> <p>Enhancement of Local Services Local services in the community such as provision of supports to rural GPs, the rural post office network, rural schools and the local grocery/convenience shop should be seen as a key component of the character and life of any village in rural Ireland.</p>	<p>The Draft Plan recognizes the role that agricultural plays in the economic development of the county and the need for farmers to live in rural areas. This differentiation is not included in the plan.</p> <p>The ownership of land is outside the remit of the CPD. The rural settlement policy sets out the criteria/framework for rural housing</p> <p>The Local Authority are supportive of farm diversification and are available to discuss such development proposals through the pre planning process. 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.</p> <p>The Draft Plan recognizes that the vitality and vibrancy of rural settlements is key to retaining population and services in these areas. The Plan promotes active land management in order KCDP 4-22 to 4-43. To regenerate buildings and lands in towns and villages.</p>

	<p>Landfill License - Kerry IFA requests that where a farmer is using, clearing, moving and filling landfill from one part of their farm to another part during the construction or development of sheds, yards, roadways or other farm activity, that this use of landfill is exempt from the requirement to apply for a licence for such activity. they also request that this form of development should not incur additional cost for applying for a license</p>	<p>The requirement for a landfill licence is under the remit of the EPA.</p>
<p>KE-C1-11 Roadstone Ltd.</p>	<p>This submission outlines that Roadstone Ltd. operates out of 5 locations in Co. Kerry and have provided / provide aggregates and added value construction materials to support the local, regional and national economy.</p> <p>Key Points in the Submission</p> <p>The submission welcomes the inclusion of the extractive industry within Chapters 3,9 and in volume 6 – DM standards. Suggestions include that the Draft Kerry CDP could be revised to adequately outline the economic value and significance of the aggregates sector, emphasising the sector’s significance in terms of socio-economic benefits. It is stated that the Draft CDP should acknowledge that aggregate resources are not evenly distributed across the country or county and can only be worked where they occur naturally. As well as providing essential building materials for the construction industry, aggregate resources are also essentially a finite resource, in that, once extracted they cannot be replaced.</p> <p>The submission also considers that the Draft Kerry CDP should include an objective with respect to the after use of quarry and extractive sites with a suggested text as follows: "To encourage the rehabilitation of disused quarries and extractive sites, to include backfilling with inert soil and stone, to possible uses including habitat restoration, sustainable forestry, agriculture, recreation/amenities, commercial, industrial, and residential, or a combination of same, subject to normal planning and environmental considerations"</p> <p>It is important to ensure that the future interpretation of CDP policies does not result in the sterilisation of aggregate and related resources and does not prevent the secure, long-term supply of construction aggregates, and value-added products such as concrete products and road making materials.</p>	<p>The Plan recognises the importance of the provision and safeguarding of raw materials in order to ensure continual economic growth for the county and region. Policies, objectives and standards relating to the extractive industry are contained in Vol1 & 6 of the Draft Plan. Section 1.16.1(h) relates to rehabilitation and aftercare of quarries. It is considered prudent to include an additional objective</p> <p>It is recommended to include an additional objective 9-67; To encourage the rehabilitation of disused quarries and extractive sites, to include backfilling with inert soil and stone, to possible uses including habitat restoration, sustainable forestry, agriculture, recreation/amenities, commercial, or a combination of same, subject to normal planning and environmental considerations"</p>
<p>KE-C1-444 Micheal F Quirke & Sons</p>	<p>Planning permissions granted should not cease to have effect until all the aggregate reserves identified in the Material balance of the EIAR have been fully extracted and that all quarry operators are treated equally in terms of time limits on extraction imposed by Planning Conditions.</p> <p>Quarrying of aggregates which are present below the water table should be permitted in an environmentally sustainable manner regulated by a planning condition.</p> <p>KCC in conjunction with TII should upgrade roads to enable aggregates to be extracted where they are found and to safeguard their supply into the future.</p>	<p>The extractive industry provides essential raw materials for the construction industry as well as providing employment and economic growth in the local and regional economy. The continual supply of aggregates is necessary for continual economic growth, which is an integral requirement for the implementation of the National Development Plan, Transport 21, and private sector development. Reserves of suitable material are finite, and extraction can only take place where these reserves are found.</p> <p>1. Time limits on the operation of quarries are essential in order to regulate activities on site, ensure that the extraction and related activities</p>

		<p>are carried out in accordance with the proper planning and development of the areas and in compliance with conditions attached to and permission. The council recognise that extraction rates are demand driven and can fluctuate annually</p> <p>2. The extraction of aggregates from below the water table can have major hydrological implications. This is permissible subject to regulations. Proposed policy and objectives for the extractive industry are set out in S9.7.6.2.1 of the Draft CDP. In addition, development management standards and guidelines are set out in Volume 6, S1.16 of the CDP. The draft CDP does not rule out the quarrying of aggregates below the Water Table. Therefore, this is open to consideration as part of a planning application and would be assessed within the context of the CDP policy and objectives, the Quarries and Ancillary Activities Guidelines for Planning Authorities 2004 and the Proper Planning and Sustainable Development of the area</p> <p>3. The council in conjunction with the TII have a programme of works to upgrade the road network and to ensure safety for all road users. Quarry operators pay €0.29p/m3 as a development contribution and this funding is ringfenced for any road improvement /maintenance.</p>
<p>KE-C1-71 MJ Kearney</p>	<p>Castleisland should be the preferred choice for Technology Investments in conjunction with the rest of the Kerry Hub region, Knowledge Triangle and the Agri Tech and Agriculture Region.</p> <p>An Industrial Estate suitable for the development of a Regional Logistics, Transport, and Industrial Hub should be created. Castleisland Chamber would submit that the Industrial Zone effect would be achieved by the designation of suitable tracts of land with easy access to the by-pass.</p> <p>The submission highlights its suitability as a location for Light Industry, Logistic Centres, Service Bases and stated that more Public Service Departments should be relocated to Castleisland. The Castleisland/Sliabh Luachra region has the capacity to grow Agri, Rural and Cultural tourism further, in the context of a strengthened and enlarged but linked local Region, representing the very best of a unique part of Hidden Ireland.</p>	<p>Castleisland is one of eight regional towns in the county. As set out in Table 9.2: Economic Strength of the Principal Urban Settlements, the Town contains 1,765 jobs and therefore contributes to the employment sector within the county. Castleisland forms part of the Killarney Municipal District Local Area Plan and therefore any suggestions for zoning of industrial land would need to be brought forward during a review of the plan.</p>
<p>KE-C1-292 Johnny Healy-Rae</p>	<p>The submission states that remote working should be promoted and encouraged in the plan.</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</p>

<p>KE-C1-358 Cllr. Breandán Fitzgerald</p> <p>KE-C1-385 Cllr Jackie Healy-Rae</p>		<p>community. There are several ‘Hubs/Co-working’ spaces all over Kerry. 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>KE-C1-391 Cahersiveen Community and Business Alliance</p>	<p>The submission states that remote working (from home or a designated hub or a hybrid model) is here to stay and this presents great opportunities for Cahersiveen and West Iveragh as Cahersiveen town already has excellent optic fibre cable broadband capability and that early mover advantage should not be lost.</p>	<p>The Local Authority recognizes the role that remote working now plays in society. Table 9.3 of the Draft Plan sets out the current digital hubs within the county which includes Office Light in Cahersiveen.</p>
<p>KE-C1-222 Screen Kerry</p>	<p>The submission states that the Screen Industry, should be recognised in the Economic Sectors & Opportunities (Section 9.7) of the Plan.</p> <p>The submission welcomes the insertion of Objective KCDP 9-43. The submission states that creative hubs where people working in the Screen Industries, eg Producers, Graphic Designers & Editors, can network and drive business to each other are an excellent way to capitalise on the potential in the county and support professionals in growing businesses.</p>	<p>The creative sector/industry is included in Chapter 8 and objectives KCDP 8-19 and Chapter 9 objective KCDP 9-43.</p> <p>Objective KCDP 10-71 seeks to facilitate and support the growth of the film industry in Kerry by maximising the opportunities for screen tourism through the development of tourism facilities and infrastructure related to the film industry, including appropriately located film trails / routes, signage and visitor attractions with the potential to portray the county in a positive light and generate economic activity and employment.</p> <p>Noted and the support is welcomed.</p>
<p>KE-C1-119 Lyreacrompane Community Development</p>	<p>The submission states that the area has access to fibre broadband which makes it suitable for those working from home, studying and for leisure use. Also highlights its location in close proximity to larger settlements making it suitable for hybrid working.</p>	<p>Submission noted</p>
<p>KE-C1-134 John Fox</p>	<p>The submission states that the Plan must include the provision of proper infrastructure, such as, services, roads, water, electricity but focuses on the provision of digital services due to the recent trend of working from home. It states that the Local Authority must ensure that the best up-to-date communication systems are available to all of County Kerry.</p>	<p>The County development plan has extensive policies and objectives supporting the provision of enabling infrastructure. The delivery of this infrastructure rests across a range of agencies include KCC, TII, Irish Water, the NTA and other providers. The Plan provides for a land use framework and supportive environment for their delivery.</p>

Recommendations

Amend KCDP 9-32 to include **an active local community**

Amend KCDP 9-33 to include **Life wide learning.**

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.**

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**

Chapter 10 – Tourism & Outdoor Recreation - Policy Context		
	Submission Summaries	CE Response and Recommendations
KE-C1-363 NEWKD	<p>This submission seeks the inclusion of additional wording to Objectives KCDP 10-2, KCDP 10-3, KCDP 10-7, KCDP 10-10, KCDP 10-11, KCDP 10-29, KCDP 10-33 and KCDP 10-46.</p> <p>KCDP 10-2 Facilitate sustainable tourism development throughout the County and particularly in areas where tourism is currently underdeveloped and where there is a need for local tourism development initiatives including Greenways, Blueways, Peatways, Cycleways, Walkways and Marine Leisure <u>(e.g., consideration should be given to the development of a greenway linking Tarbert and Ballybunion via Ballylongford following the Shannon estuary as part of the Wild Atlantic Way)</u></p> <p>KCDP 10-3 Liaise with strategic partners such as Fáilte Ireland (South West Region), the National Parks and Wildlife Services, Inland Fisheries Ireland, Waterways Ireland, Coillte, other relevant national bodies and the local tourism sector on the identification of land use strategies for areas, focusing on their tourism, environmental and heritage value, <u>including the maintenance of the maximum area for town parks, etc.</u></p> <p>KCDP 10-7 Support the implementation of the County Kerry Tourism Strategy and Action Plan (2016-2022) including the upgrading and repurposing of existing attractions, the development of the tourism projects and the preparation and adoption of successor strategies, <u>including an improved balance of tourism throughout the county by enhancing the archaeological, historic, cultural and natural beauty opportunities and of North Kerry and the Shannon estuary.</u></p>	<p>In relation of Objective KCDP 10-2 it is not considered necessary to include an example of where this should be carried as it relates to the entire county.</p> <p>Regarding Objective KCDP 10-3 the inclusion of the wording “including the maintenance of the maximum area for town parks, etc.” is not appropriate within the overall objective.</p> <p>The proposed amendment to Objective KCDP 10-7 is not considered appropriate as it relates to an existing strategy. The tourism strategy will be reviewed in 2022 and additional detailed objectives can be considered.</p>

	<p>KCDP 10-10 Encourage tourism developments, increased visitor accommodation, interpretation centres, and commercial / retail facilities serving the tourism sector to be located within established settlements thereby fostering strong links to a whole range of other economic and commercial sectors and sustaining the host communities.</p> <p>KCDP 10-11 Work with Fáilte Ireland, for the further enhancement and promotion of the Wild Atlantic Way touring route, subject to environmental assessment, <u>including through the latest and emerging technology solutions / apps / etc.</u></p> <p>KCDP 10-29 Support the increased development of appropriately scaled camping/glamping, campervan and caravan type accommodation located within/or adjacent to existing settlements, established tourism assets or adjacent to a main farmyard complex on suitable sites and at an appropriate scale subject to normal planning considerations.</p> <p>KCDP 10-33 Promote and facilitate the sustainable development of outdoor activities <u>including winter and adventure sports</u>, in appropriate locations, such as walking, rambling, cycling, land and sea-based activities with specialised centres and facilities in association with Munster Technological University, Fáilte Ireland, National Trails Office, National Parks and Wildlife Service, Local Development Companies, Sport Ireland, Healthy Ireland, Local Development Companies, Kerry Education and Training Board and other relevant national and County based departments and agencies.</p> <p>KCDP 10-46 Support and facilitate the maintenance, enhancement and promotion of Blue Flag beaches, and seek to identify any additional locations which may satisfy the criteria for Blue Flag status, <u>while seeking to facilitate businesses (such as equine industry) that provide local jobs.</u></p>	<p>In relation to Objective KCDP 10-10 the amendment is welcomed. It is recommended to amend the wording to read “Encourage tourism developments, increased visitor accommodation, interpretation centres, and commercial / retail facilities serving the tourism sector to be located within established settlements thereby fostering strong links to a whole range of other economic and commercial sectors and sustaining the host communities”.</p> <p>The proposed amendment to KCDP 10-11 would be more appropriate in Chapter 14 Connectivity.</p> <p>In relation to Objective KCDP 10-29 the proposed additional wording of ‘increased’ would not add to the merit of the objective.</p> <p>The inclusion of additional wording “including winter and adventure sports” is considered to be appropriate. It is recommended to amend the wording to read “Promote and facilitate the sustainable development of outdoor activities including winter and adventure sports, in appropriate locations, such as walking, rambling, cycling, land and sea-based activities with specialised centres and facilities in association with Munster Technological University, Fáilte Ireland, National Trails Office, National Parks and Wildlife Service, Local Development Companies, Sport Ireland, Healthy Ireland, Local Development Companies, Kerry Education and Training Board and other relevant national and County based departments and agencies”.</p> <p>The proposed additional wording for Objective KCDP 10-46 is not considered relevant to this objective. The Blue Flag is an eco-label that recognises an adherence to specific criteria related to water quality, information provision, environmental education, safety and site management. It is an objective of the plan to ensure that our coastal areas are maintained to the highest level in order to provide a valuable recreational resource for the county.</p>
<p>KE-C1-215 Shannon Rangers</p>	<p>The submission requests that Kerry County Council include as an objective in the County Development Plan an increase in tourism for North Kerry by putting in place strategies and</p>	<p>Kerry County Council recognises the valuable contribution North Kerry makes to the county’s tourism offering, particularly in terms of natural and heritage assets. The Wild Atlantic Way has encouraged visitors to</p>

<p>KE-C1-134 John Fox</p>	<p>measures to achieve this desired increase. We request that Kerry County Council put in place measurable targets to show that the desired increase is being achieved.</p> <p>The submission states that tourism must be vigorously promoted with both the north and south of the county having a different offering.</p>	<p>new areas of the county and therefore provides an even greater tourism draw. See response to Submission KE-C1-279 Failte Ireland.</p> <p>The Cliff Coast DEDP will set out a policy framework for tourism in North Kerry. The Listowel to County bounds greenway will be operational in 2022 and provides an additional attraction to North Kerry. The draft County Development Plan is a land use planning framework for county Kerry. Kerry County Council conducts significant marketing of the County in relation to tourism. A detailed marketing strategy is being developed for the greenways. KCC has also partnered with Kerry Tourism Industry Federation and Fáilte Ireland in developing a broad Tourism Marketing Strategy for the County. The county development plans role in promoting Kerry in terms of tourism to provide policies objectives and specific land use zoning to support Tourism throughout the county. Chapter 10 Tourism & Recreation provides a variety of objectives that support the tourism industry as well as support the continued and heightened engagement with national strategic partners to promote tourism in Kerry.</p>
<p>KE-C1-107 John O'Sullivan</p>	<p>The submission states that all agencies, IDA, Failte Ireland, etc. should be fully aware of each other's policies.</p>	<p>The IDA and Failte Ireland are statutory consultees during the County Development Plan review process and therefore have the opportunity to review the Draft Plan and submit their views for consideration.</p>

Recommendations

Amend KCDP 10-10 as follows: "Encourage tourism developments, **increased** visitor accommodation, interpretation centres, and commercial / retail facilities serving the tourism sector to be located within established settlements thereby fostering strong links to a whole range of other economic and commercial sectors and sustaining the host communities".

Amend KCDP 10-10 as follows: "Promote and facilitate the sustainable development of outdoor activities **including winter and adventure sports**, in appropriate locations, such as walking, rambling, cycling, land and sea-based activities with specialised centres and facilities in association with Munster Technological University, Fáilte Ireland, National Trails Office, National Parks and Wildlife Service, Local Development Companies, Sport Ireland, Healthy Ireland, Local Development Companies, Kerry Education and Training Board and other relevant national and County based departments and agencies".

<p>Chapter 10 – Tourism & Outdoor Recreation - Tourism in County Kerry</p>		
	<p>Submission Summaries</p>	<p>CE Response and Recommendations</p>
<p>KE-C1-42 Sean O'Reilly KE-C1-385 Cllr Jackie Healy-Rae</p>	<p>This submission calls for the consideration to develop a site at Kilnabrack Lower, Glenbeigh into a small-scale environmentally sustainable eco-friendly Glamping Site.</p> <p>The submission states actively encourage and support the development of full serviced camper/mobile home sites.</p>	<p>Kerry County Council recognises (See Section 10.3.5.1) that the provision of suitable sites for camping/glamping, campervans and caravans is an important element in the range of tourist accommodation offers. While the Council considers that camping sites should be located on appropriately zoned land within established/or adjacent to existing settlements, small scale camping sites may be appropriate to</p>

<p>KE-C1-147 Tarbert Development Association KE-C1-71 MJ Kearney</p> <p>KE-C1-513 Mikey Sheehy</p> <p>KE-C1-204 Tim o'SULLIVAN</p> <p>KE-C1-109 Tina and Barry Godley</p>	<p>Provide parking spaces for Camper vans in locations which do not have this facility now. Increased visitor accommodation - fully serviced Glamping and Camper Van accommodation, Guesthouse, Airbnb, and Farmhouse accommodation to accommodate the 'experience' seeking visitor.</p> <p>Support the sustainable development (see KCDP 10-30) of glamping, camping and motorhome facilities throughout the county and is considered and prioritised even in visually sensitive areas.</p> <p>This submission states that the development plan should include provision of parking areas for motorhomes, particularly in Rossbeigh.</p> <p>The submission seeks consistency in the application of the County Development Plan policies and objectives and refers to the granting and refusal of planning applications for glamping accommodation.</p>	<p>complement tourism assets in rural and coastal locations within or adjacent to existing settlements. The planning authority may facilitate proposals for camping sites which support rural tourism initiatives subject to proper planning and sustainable development. It is also 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.</p> <p>Kerry County Council are fully supportive of a wide range of tourist accommodation options and are happy to discuss proposal for fully serviced camper/mobile home sites through the pre planning process. Support for the provision of a wide range of tourist accommodation is outlined in Objectives KCDP 10-29 and KCDP 10-30.</p> <p>This proposal is more relevant to the review of the relevant Municipal District Local Area Plan.</p> <p>The objectives as set out in the both the existing County Development Plan and the new draft county development plan support the development of glamping type accommodations. All objectives and policies are applied consistently across the county. Every planning application is assessed on its individual merits in line with county plan objective, policies and various national and statutory guidelines outside of the county development plan as well as site specific constraints that must also be satisfied when determining the outcome be it a granting or refusal of a planning application.</p>
<p>KE-C1-131 Tobar Dhuibhne - Plean Teanga Chiarraí Thiar</p>	<p>Air B+B/Vacant Properties It is recommended that an action plan be established by the Council to tackle vacant properties and Air B+B properties in the Gaeltacht.</p>	<p>The supply of housing for long-term rental or purchase by those wishing to live and work in the Gaeltacht area is acknowledged as a serious challenge impacting not alone on the people seeking accommodation but on the opportunities for those people to seek accommodation. It is the stated policy of the Local Authority outlined in section 10.3.5.3 of the Development Plan to maintain established and newly constructed residential areas as places of permanent residential occupation by owner/occupiers and/or long-term tenants. Objective KCDP 10-32 reinforces the Local Authority's policy in terms of maintaining residential property for its intended use – residential: <i>Prohibit the change of use of residential properties to short-term letting in established residential areas and newly constructed residential developments.</i></p>

		<p>The letting of a property on a short term basis is a material change of use of the property and requires planning permission. The Local Authority is using all of its functions available to it to try to address this problem. A dedicated enforcement officer has been engaged to identify all short term let properties across all platforms in certain towns in certain parts of the County, including Dingle town and surrounding area. This is being done in recognition of the significant impact the short term letting of properties is having on the housing market. A significant number of these properties require planning permission and will unlikely be granted permission given the lack of supply of properties for people to rent on a long term basis or to buy. Enforcement action will then be taken to ensure that these properties are removed from short term letting platforms. With respect to vacant homes, Kerry County Council has obligations under the Derelict Sites Act to tackle any property that is deemed to be derelict in accordance with the definition of the Act. The Council has a dedicated Derelict Sites' Officer who actively pursues these properties. Where a person becomes aware of a derelict property, they may highlight it to the Council for action. However, it should be noted that where a property is vacant but not derelict then the Local Authority has no legal remit to require that the property be made available for residential use (or any other use).</p>
<p>KE-C1-109 Tina and Barry Godley</p> <p>KE-C1-283 Johnny Healy-Rae</p>	<p>The submission states that the Tourism Strategy priorities the support for SME's to raise standards, change, improve and adapt to changing international tourism practices. It requests that the policy regarding glamping should be reviewed with this in mind as currently glamping policy in the current County Development Plan is focusing glamping provision to within settlements. This stifles innovation and leads to inferior product offering compared to (sensitive) glamping provision in the countryside. The submission also highlights that Failte Ireland's Experience Development Strategy for Kerry which states that a sustainable plan to improve the visitor experience should be developed.</p> <p>The submission states that additional and diverse tourist accommodation is needed in North Kerry as highlighted by the Draft Cliff Coast Plan by Failte Ireland. The submission further states that the provision of diverse accommodation means that property in the area can remain in the market for rent or purchase as housing not holiday rentals. The submission requests that the wording around glamping is loosened to allow for farm diversification.</p>	<p>The objectives as set out in the both the existing County Development Plan and the new draft county development plan support the development of glamping type accommodations in particular objective KCDP 10-29 under 10.3.5.1 Camping/Glamping, Campervans and Caravans of chapter 10 Tourism and Outdoor. All objectives and policies are applied consistently across the county.</p> <p>Kerry County Council recognises the need to provide a wide range of tourist accommodation types. It is an objective of the Plan to provide a diverse range of tourist accommodation including appropriately scaled camping/glamping, campervan and caravan type accommodation as set out in Objective KCDP 10-29.</p> <p>Kerry County Council recognises (see Section 10.3.5.1) that the provision of suitable sites for camping/glamping, campervans and caravans is an important element in the range of tourist accommodation offers. While the Council considers that camping sites should be located on appropriately zoned land within established/or adjacent to existing settlements, small scale camping sites may be appropriate to</p>

		<p>complement tourism assets in rural and coastal locations within or adjacent to existing settlements. The planning authority may facilitate proposals for camping sites which support rural tourism initiatives subject to proper planning and sustainable development.</p> <p>It is also 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.</p>
<p>KE-C1-241 Johnny Healy- Rae</p>	<p>The submission seeks guidelines for glamping or pods in South Kerry.</p>	<p>Kerry County Council have set out objectives in relation to the provision of a variety of tourist accommodation. Volume 6 of the Draft Plan set out development management standards in relation to the provision of Caravan, Glamping and Camping Developments – see Section 1.12.2.</p>
<p>KE-C1-51 Peadar O Fionnáinn</p>	<p>The Wild Atlantic Way is largely presented as an experience for motorists. KCC should act to limit coach traffic on the Dingle Peninsula, and other areas such as Ring of Kerry, by way of limited hours and limited number of coaches. In particular signage, cycle-ways and traffic management should actively promote cycling/walking on all scenic routes. This encourages slower tourism, longer stays, higher value and lower environmental impact in line with principles of sustainable tourism.</p>	<p>Kerry County Council and Fáilte Ireland have identified the need to improve traffic and visitor management along the Wild Atlantic Way in Dingle and Sleah Head - with traffic congestion and safety concerns arising particularly during the peak summer months. In order to address same in an environmentally sustainable manner, Fáilte Ireland have received funding through the Rural Regeneration Fund for a proposal titled 'Solving Critical Congestion & Visitor Management Issues on the Wild Atlantic Way - An Urgent Intervention to Sustain Rural Tourism Growth on the Wild Atlantic Way & Ensure the Delivery of a World-Class Experience'. Phase one of same involves a review of areas suffering congestion issues. Following on from this, measures will be proposed taking into account the environmental sensitives in the area. In certain instances, the provision of additional car parking facilities may be appropriate where they would better manage existing pressures and where their siting would be compatible with environmental designations and not unduly detract from the character of the area. Kerry County Council will seek to address traffic and visitor management issues in accordance with the Sleah Head traffic mobility plan.</p>
<p>KE-C1-171 Asdee Community Development Association</p>	<p>This submission welcomes the mapping of the Wild Atlantic Way (Map 14.3) and encourages Kerry County Council to ensure that all road signage, applications and publicity material adhere to this route – which goes through Asdee, Ballylongford, Beal and Ballybunon. The submission further welcomes the designation of Carrigafoyle Castle, Beal Strand as 'discovery points' and we recommend the inclusion of Littor Strand in this category.</p>	<p>Content of the submission is noted and welcomed. KCDP 10-12 outlines a range of solutions for the improvement of the WAW including improvement works, lay-bys/passing bays/parking/traffic and visitor management solutions to these issues will be subject to further consultation.</p>
<p>KE-C1-62 Seamus Fleming</p>	<p>Develop Glounsharoon as a primary Tourism scenic Landmark and remove/relocate the KCC yard as it is causing visual and noise issues.</p>	<p>The removal/relocation of the Kerry County yard is something which could be achieved under the review of the Killarney Municipal District Local Area Plan 2018 – 2024.</p>

<p>KE-C1-338 Danny Healy-Rae</p> <p>KE-C1-71 MJ Kearney</p>	<p>The submission states that it should be an objective of this plan to enhance the Glounsharoon viewing point by relocating the council yard which is currently located in close proximity to the viewing point.</p> <p>Enhancement of the Glounsharoon viewing vista and upgrading required for the entrance roundabouts including planting and road signage on the Castleisland by-pass.</p>	
<p>KE-C1-71 MJ Kearney</p>	<p>To connect the Diaspora back to their roots we would propose a tri annual county wide mid-summer Gathering Event promoted by each Chamber, Tourism Bodies and Kerry County Council.</p> <p>Sliabh Luachra Heritage - Tourism and heritage offerings already existing in the Castleisland Area, such as Crag Caves, the Glenageenty Walks and the Con Houlihan Trail. The Sliabh Luachra Region and Trail concept, the Padraig O' Caoimh Festival, along with the Handed Down Series and World Fiddle Day - all need to be strongly marketed and signposted where necessary.</p>	<p>This is more appropriate for consideration in the review of the Tourism Strategy.</p>
<p>KE-C1-71 MJ Kearney</p> <p>KE-C1-45 Brendan O'Shea</p> <p>KE-C1-171 Asdee Community Development Association</p> <p>KE-C1-81 Ian Crowley</p> <p>KE-C1-385 Cllr Jackie Healy-Rae</p>	<p>Link Castleisland with surrounding areas via Greenways, the Castleisland/Sliabh Luachra Region to the WAW, via Ballyseedy Woods, Ballygarry Estate and the Limerick/North Kerry Greenway to the Glenageenty Walking Trails, and the Lyreacrompane Region and Walkways. As a second phase along the old railway track to Gortalea, along the River Maine to Castlemaine and onwards via the proposed South Kerry Greenway to Caherciveen, Valentia Island and South Kerry.</p> <p>A feasibility study should be carried out on extending the Greenway from Glenbeigh back to Farranfore (or technically from Farranfore to Glenbeigh).</p> <p>The submission welcomes the greenway strategy and the routing of the North Kerry Greenway through Asdee (Map 14.1), and encourages Kerry County Council to expedite this project, and welcomes active travel measures.</p> <p>The submission requests the development of a greenway linking Castleisland and Tralee and potentially continuing on to Chorca Dhuibhne,</p>	<p>Kerry County Council is currently in the process of developing a greenway strategy in consultation with Transport Infrastructure Ireland (National responsibility for Greenways) and in accordance with the relevant guidelines. Comments in relation to the potential for further greenways and/or similar projects in the county are noted. This is specifically addressed in the existing Chapter 10 & 14 of the CDP. 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>The Council recognises the potential of Kerry's old railway lines and other potential linkages to act as Greenways for walking and cycling routes. Former railway lines in Kerry, have already been developed and others have the potential to be developed as 'greenways. The Council will continue to protect the routes of such potential greenways through the policies of this plan and will actively work with all stakeholders to facilitate the development of Greenways and walking and cycling routes throughout the County. Objective KCDP 10-41 seeks to <i>Support the linking and extension of existing greenways, long distance walking routes, blueways, and peatways within the county and the integration and linkage of them with other existing / proposed greenways, long distance walking routes, blueways and peatways both within and outside County Kerry.</i></p>

KE-C1-385 Cllr Jackie Healy-Rae	The submission states that it should be an objective of this plan that the Riverwalk in Castleisland would be taken in charge by Kerry County Council.	This would be more appropriately addressed at Municipal District level.
KE-C1-385 Cllr Jackie Healy-Rae	The submission requests that signage is put in place along greenways warning people about Ticks and the dangers they impose.	This will be considered where appropriate on signage on greenways – it is not a matter for the CDP.
KE-C1-80 Kerry IFA	The development of these greenways and cycleways to promote tourism should be done in consultation with farmers and land owners affected along the routes to ensure the continued smooth running of farms without disruption to land owners or livestock and that no risk or liability accrues to landowners or farmers along the routes. This should be done at all times without the use of CPO to secure land, which after all is recreational and not Critical infrastructure.	Public Consultation is carried out in relation to the development of all greenways and cycleways and therefore there is an opportunity for the public to engage. During the consultation phase the route of the proposed greenways are put on public display for inspection.
KE-C1-80 Kerry IFA	In the Countryside Code, agreed with Comhairle na Tuaithe it is stated that no dogs are allowed on hills or farmland without the landowner’s permission. We would hope for support in the Kerry Development plan for this code, for education of all on the damage dogs on hills can cause and also much more stringent enforcement of the laws on dogs	Dog walking or other such activities do not fall within the remit of the CDP.
KE-C1-127 Farranfore Development Association	Improve welcome signage on all approach roads, highlighting key attractions and points of interest in Farranfore as well as services available in Farranfore.	While the submission has merits – it is not appropriate for the CDP.
KE-C1-297 Dingle Peninsula Tourism Alliance	<p>The submission seeks the following amendments:</p> <p>KCDP 10-9 recommends a coherent and inclusive destination branding strategy as a marketing strategy tool for Kerry.</p> <p>KCDP 10-10 – should include the wording “where possible”.</p> <p>KCDP 10-11 The carrying capacity of certain routes such as the Sleah Head Drive needs to be included. Please note, the Dingle Peninsula Tourism Alliance Council and Members do not see widening the Sleah Head Drive or the Conor Pass as solutions. It is imperative that the character of the landscape is not changed to facilitate more volume of traffic and coaches. These places are Special Areas of Conservation.</p> <p>KCDP 10-14 Local community tourism groups should be added here as they support and promote their local festivals and events.</p>	<p>The comment in relation to this objective is welcomed. See response to KE-C1-279 Failte Ireland Submission.</p> <p>Kerry County Council in association with KTIF and FI are developing a branding strategy for the County.</p> <p>It is considered that the primary location for tourism developments is within established settlements and therefore it is not considered appropriate to include additional wording “where possible”. Any development proposals at existing sites will also be considered on a case-by-case basis.</p> <p>Submission is noted. KCDP 10-12 outlines a range of solutions for the improvement of the WAW including improvement works, lay-bys/passing bays/parking/traffic and visitor management solutions to these issues will be subject to further consultation.</p> <p>Community groups are included within Objective KCDP 10-14 as stakeholders which encompasses local community tourism groups and</p>

	<p>KCDP 10-20 add host community</p> <p>KCDP 10-21 No carpark should be developed at Ceann Sréithe / Clogher Head due to its environmental integrity and film location attributes.</p> <p>KCDP 10-28 local housing could be included here too.</p> <p>KCDP 10-31 should include towns and villages in popular visitor areas</p> <p>KCDP 10-58 include host community here as the social management side of tourism enterprises.</p> <p>KCDP 10-61 add local community tourism groups.</p>	<p>therefore it is not considered necessary to include the additional suggested wording.</p> <p>It is recommended to include additional wording host community to Objective KCDP 10-20.</p> <p>The comment in relation to this Objective KCDP 10-21 is noted and no development will be carried out which would cause harm to sensitive sites. All such proposals will be subject to appropriate procedures and include public consultation.</p> <p>The addition of local housing does not add any additional meaning to the objective.</p> <p>This objective relates to the entire county and therefore it is not considered necessary to include additional wording in this objective.</p> <p>For Objective KCDP 10-58 this relates to the protection of heritage assets across the county.</p> <p>Local communities and businesses are included within Objective KCDP 10-61 as stakeholders which encompasses local community tourism groups and therefore it is not considered necessary to include the additional suggested wording.</p> <p>Also see response to Submission KE-C1-279 Failte Ireland.</p>
<p>KE-C1-304 MWP</p>	<p>The submission states that the current wording of Objective KCDP 10-10 is considered too narrow and seeks a wording amendment as KCDP 10-10 "Encourage developments which seek to expand and diversify existing visitor accommodation offers in all locations to foster a more diverse visitor base and increasing the resiliency of the tourism sector". The submission also proposes text amendments to Section 10.3.5.1.</p>	<p>Whilst this submission seeks any amendments to broaden the scope of the objective, there are other objectives contained within the Draft Plan which relates to the provision of tourism developments and commercial/retail facilities serving the tourism sector including KCDP 10-13 which relates to the provision of visitor attractions and KCDP 10-18 for tourist related facilities, such as information offices and cultural centres.</p> <p>The submission seeks wording amendments to Section 10.3.5.1 but it is not considered necessary to include additional wording as what the submission is seeking is already set out in the wording of the Draft Plan.</p>

<p>KE-C1-69 Lyreacrompane Heritage Group</p>	<p>The new Development Plan should recognise the unique heritage of the general Lyreacrompane/Stacks/Glanaruddery Mountains area and its potential as an alternative tourist product/attraction including promoting a tourist 'Lyreacrompane' corridor and the development of a heritage house. The plan should designate the Stacks /Glanaruddery Mountains as an area for the development of walks.</p> <p>The Development Plan should state the intention of the Council to carry out a feasibility study on developing a Greenway from the west Limerick/Listowel Greenway, along the valley/banks of the Smearlagh River into Lyreacrompane and on to connect with the Glanageenty area/Walks and on then to Tralee and/or Castleisland. A Dark Sky Peatland Reserve along the route would, in the future, complement the Greenway.</p>	<p>It is the policy of the Council through its role as a planning authority and a building control authority, to ensure that there is a wide range of accessible tourism /leisure/ recreational/heritage experiences available throughout the County.</p> <p>The Council has developed a Greenway Strategy for the future development of routes throughout the county. The Council will seek to roll out the development on the greenways in a coordinated and linked up manner. The Council will also continue to protect the routes of such potential greenways through the policies of this plan and will actively work with all stakeholders to facilitate the development of Greenways and walking and cycling routes throughout the County.</p>
<p>KE-C1-246 Ballylongford Enterprise Association</p>	<p>The submission highlights the importance of tourism in Ballylongford. The submission states that the Wild Atlantic Way should be utilised to facilitate cyclists and walkers from Tarbert to Ballybunion via Ballylongford.</p>	<p>This route has huge potential for tourism given its proximity to the Wild Atlantic Way. The Council has developed a Greenway Strategy for the future development of routes throughout the county. The Council will seek to roll out the development on the greenways in a coordinated and linked up manner plan and will actively work with all stakeholders to facilitate the development of further walking and cycling routes throughout the County. The council will investigate the possibility to connect the greenway in Listowel to the wild Atlantic way in Ballylongford, using the Bunnaruddee bog, in an environmentally sensitive manner.</p>
<p>KE-C1-198 Steve Edwards</p>	<p>The submission welcomes the objectives set out in Chapter 10 and highlights the potential for tourism development in the Ballyduff/Lixnaw area [including the North Kerry Museum to the nationally important Rattoo round tower] and North Kerry in general. It states that people are ready and waiting to help to develop sustainable, ecological and heritage tourism with benefits for the local economy and amenities for education, wellbeing and exercise of local people.</p>	<p>The contents of the submission of noted and welcomed. The Draft Plan recognizes the contribution that North Kerry makes to the tourism offering in the county. Kerry County Council are willing to engage with any group or individual who is seeking to develop a tourism offering.</p>
<p>KE-C1-348 Lucian Horvat</p>	<p>The submission supports the development of tourism information points and requests that the local authority encourages business initiatives on Valentia Island and development of business-like restaurants, food, café's, attractions and activities.</p>	<p>It is the policy of the Council to support the provision of high-quality information for visitors, for example through local tourist offices, local and national websites, accommodation providers and at attractions themselves. The Draft Plan facilitates and supports the provision of tourist related facilities, such as information offices, as set out in KCDP 10-18.</p>
<p>KE-C1-147 Tarbert Development Association</p>	<p>Kerry is rich in architectural, historical and cultural heritage which must be preserved. While most villages and towns have developed local heritage trails in recent years there is no linkage between nearby towns which would greatly enhance the value of these local trails from a tourism perspective and this would also help to enhance the local economy.</p>	<p>The Kerry Tourism Strategy & Action Plan 2016-2022 prioritises creating links between greenways and cycleways/pathways and it is an objective of the Draft Plan to support the implementation of this strategy, and the preparation and adoption of successor strategies [KCDP 10-7].</p>

KE-C1-380 MARTIN MULVIHILL	The submission requests that sustainable tourism development in Moyvane is linked to the Listowel-Abbeyfeale Greenway and that this is specifically mentioned in the Plan. Promote North Kerry as a tourism destination considering its proximity to the 'Wild Atlantic Way' and the Tarbert-Killimer Ferry, with specific reference to this within the Plan.	See response to Submission KE-C1-215.
KE-C1-391 Cahersiveen Community and Business Alliance	The submission suggests that objective KCDP 10-5 is amended to include "local communities" "..... ensure that the economic potential of the tourism sector is secured for the benefit of the local economy and local communities"	This submission seeks an amendment to KCDP 10-5 to include local communities, however local communities are already included as a stakeholder, and it is considered that benefits to the local economy encompass local communities. Therefore, an amendment to this objective is not considered necessary.
KE-C1-391 Cahersiveen Community and Business Alliance	The submission strongly welcome Kerry County Council's commitment to the rollout of the Greenway between Glenbeigh and Cahersiveen to Renard for rural tourism and promoting health, wellbeing and active travel.	The comments and support are welcomed.
KE-C1-421 Killarney Access Group	The submission states that there are approx. 20,000 people with a disability in Kerry (14%), which is higher than the national average (14%). The submission seeks that all new and existing tourism facilities have due regard to people with disabilities and mobility issues. The plan should promote Killarney as an accessible town for tourism. The submission seeks the development and promotion of a more cycle and pedestrian friendly network in Killarney and that all playgrounds and play areas are fully inclusive.	The Council through the Corporate Plan, The County Development Plan, Social Inclusion & Community Activation programme (SICAP) and other programmes promotes disability awareness and improve equal access for all through universal design for public transport access, housing, social, cultural, public facilities and recreational facilities, and the public realm to improve quality of life equally for abled and disabled citizens. The Council shall ensure that decision-making in relation to investment in infrastructure and facilities is informed by engagement with representatives of disability support organisations to ensure that perspectives of those they represent (e.g., wheelchair users) are understood and an appropriate level of environmental assessment. The Draft Plan contains Objective KCDP 10-22 which recognises the importance of universal accessibility to tourist services, facilities, and tourist sites and undertake enhancements to overall accessibility where appropriate in conjunction with key stakeholders.
KE-C1-421 Killarney Access Group	The submission requests more public seating in Killarney, safe locations for pedestrian crossings and appropriately located street furniture being mindful of those with disabilities. The submission also states that Killarney Library is not accessible for wheelchair users.	The Local Authority encourages and facilitates outdoors seating areas where such spaces will not impact negatively on the amenities of the area including the provision of adequate and safe passageways for pedestrians, with particular regard to those with disabilities. It is an objective of the plan KCDP 6-23 to Ensure that all buildings, public and open spaces, recreational and amenity areas are accessible for people with disabilities, having regard to the Building Regulations, the objectives of 'Building for Everyone' (National Disability Authority) and 'Access for the Disabled' (No. 1 to 3) (National Rehabilitation Board).

		<p>The KCC Corporate Plan 2019-25 seeks to ensure that all council services and buildings are accessible, socially inclusive, and customer-friendly, with a priority given to promoting equality and the promotion of an age-friendly county. Killarney library whilst not wheelchair accessible from Rock Road, is accessible from the rear and carpark side.</p> <p>Recommendation: Additional text to be included in 10.3.4.1</p>
<p>KE-C1-111 Mol Teic (t/a Dingle Hub)</p>	<p>It is recommended that consideration be given to requiring similar types of arrangements to be put in place (as are required for licensed events) to cater for major crowds on beaches and sensitive areas of natural heritage or environmental sensitivity, seeing as the impact and rationale for licences are similar, even though they may not be specific events organised by an organisation.</p>	<p>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.</p> <p>While also acknowledging the significant contribution of tourism to the economy of County Kerry, it is also important that tourist numbers do not exceed unsustainable levels and damaging the natural heritage and environment; the particular need to protect the coastal areas, such as, The Maharees and other similar facilities; etc.</p> <p>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.</p> <p>Technology offers significant opportunities for real time data in respect of visitor numbers, traffic volumes and these are continuing to be developed offering additional opportunities for the management of sensitive attractions. It is proposed to include a new objective " <i>To explore best management practices for sensitive tourism destinations particularly during the peak tourist season.</i>"</p> <p>Certain natural heritage areas come under the remit of the National Parks and Wildlife Service and the Local Authority does not have any authority to impose laws within those areas. There are however by-laws already in place for the County's beaches as adopted by the Elected Members that prohibit certain activities while restricting other certain beach activities to operate within the terms of a licence. Taking together with objectives KCDP 10-14 & 10-16, it is considered that an additional objective in the Development Plan is not required at this time. No amendment proposed.</p>

<p>KE-C1-111 Mol Teic (t/a Dingle Hub),KE-C1-46 Cllr. Charlie Farrelly KE-C1-306 Danny Healy-Rae KE-C1-358 Brenadán Fitzgerald KE-C1-379 M Shanahan KE-C1-346 Kerry Green Party</p>	<p>It is recommended that the Council should develop a plan to ensuring that sufficient EV charging points are available across the county, to allow for simultaneous charging of multiple EVs in public buildings etc. public car parks, retail car parks, offices and tourist accommodation. The availability of a suitable app to pre-book facilities in real-time would be a distinct advantage.</p> <p>The submission seeks the inclusion of an additional Objective “Make Kerry a more attractive tourist destination for EV owners by installing additional fast charging (Chademo) infrastructure in strategic locations throughout the county and particularly along the Ring of Kerry, including, for example, Kenmare and Cahersiveen” as the use of electrical vehicle is a core part of the transition to a low carbon society and currently there are very poor fast charging facilities in Kerry, with one fast charger each in Killarney and Tralee.</p>	<p>Objectives in the Draft Plan in relation to the provision of EV charging points are KCDP 14-4 and 14-36. The Department of Transport are in the process of finalising an “Electric Vehicle Charging Infrastructure Strategy 2022-2025” and it is proposed to include an objective to support the delivery of same.</p> <p>The Draft Plan contains several objectives in relation to the provision of EV charging points, such as KCDP 14-4 and 14-36, which specifically refers to the provision of points at tourist and recreation sites such as beaches, walkway/cycleway trailheads, scenic viewing points and routes. Additional policies and objectives are included.</p>
<p>KE-C1-297 Dingle Peninsula Tourism Alliance</p>	<p>Community Tourism Groups / Local Destination Management Organisations should be highlighted and included in each of the segments of the Tourism Chapter alongside businesses, community groups and stakeholders.</p> <p>Request ongoing regular consultation as per Action A.1 of Fáilte Ireland’s Dingle Peninsula Visitor Experience Development Plan - Dingle Peninsula Traffic Management Plan with CTCD/DPTA and local communities.</p> <p>Local community development organisations have expressed a keen interest to develop walks in all parishes in the pursuit of a slow immersive model of tourism for Corca Dhuibhne and the possibilities this provides for sustainable tourism, promotion of Gaeilge, heritage, culture and agri-tourism.</p> <p>The submission seeks the following: An increase in tourism numbers should not be the key measure of success. The principal objectives of KCC should with respect to tourism should be to maximise the economic benefits in terms of visitor dwell time and the economic benefits of tourism, maintain a balance of the integrity and character of existing villages and towns to prevent over tourism and traditional communities The submission seeks to know the current status of the Tourism Strategy for Kerry (2016-2022) and who are the taskforce reviewing this? Lesser-known regions of the county should be prioritised to encourage the spread of visitors across the county.</p>	<p>See Response to Submission KE-CE-279 Failte Ireland.</p>
<p>Recommendations</p> <p>It is recommended to include additional wording host community to Objective KCDP 10-20.</p>		

Additional text to be included in 10.3.4.1

New objective “ *To explore best management practices for sensitive tourism destinations particularly during the peak tourist season.*”

Chapter 10 – Tourism and Outdoor Recreation - Tourism and Outdoor Recreation Categories		
	Submission Summaries	CE Response and Recommendations
KE-C1-194 Alan Morris	This submission raises concerns in relation to the consultation carried out in relation to the proposed UNESCO site in Valentia. The submission seeks for Kerry County Council to begin a proper process of public information-sharing and consultation with the community about its UNESCO ambitions and their full implications, specifically in relation to the Cable Terrace houses and more generally in relation to the full implications for all aspects of future development in Knightstown and its environs. KCDP 10-62 should be deleted.	<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>A detailed public consultation process is being facilitated, has commenced and will continue as an integral part of this process. The submissions include observations in relation to a number of protected sites, particularly in the Cable Terrace. There are no new designations included in the County Development Plan.</p> <p>The following text and objectives were adopted in 2019 in the West Iveragh Local Area Plan 2019-2025 Valentia Transatlantic Cable Foundation has sought UNESCO World Heritage site status for the cable station and associated buildings. This application is fully supported by Kerry County Council, and the local authority will work closely with the Valentia Island Development Company, Valentia Island Trans-Atlantic Cable Foundation, and Department of Culture, Heritage and Gaeltacht and other state agencies and institutions in Ireland and abroad to achieve this goal.</p> <p>In addition, an architectural conservation area that includes the three main sites associated with the history of the Trans-Atlantic Cable has been included in this plan. This ACA will serve to preserve the character of the place that contributes to the appreciation of the protected structures. VI-04 Support the designation of the Valentia Cable Sites as an UNESCO World Heritage Site.</p>
KE-C1-347 Oengus Skehan	The submission requests that Objective KCDP 10-62 is amended.	
KE-C1-115 RICHARD FORAN	The submission relates to the Valentia Transatlantic Cable UNESCO Project. It states that this project should not be a part of the county development plan or placed on the tentative list as an UNESCO site until all the people of Valentia are fully aware of all the implications of an UNESCO site on the Island and the majority of the residents are in favour of such a project.	
KE-C1-105 Niamh Hardiman		
KE-C1-160 Denise Gallagher	The submission raises concern over the content Vol.1 Chapter 10.4.3. in particular the following reference; "Valentia Trans-Atlantic Cable Ensemble has begun its journey towards eventual World Heritage inscription".	
KE-C1-100 Céline Lavelle	The submission requests that everyone on Valentia Island is consulted about the UNESCO projects, concerned with the lack of information and consultation.	

<p>KE-C1-197 Aoife Power</p> <p>KE-C1-206 Paudie Lynch</p>	<p>The submission relates to the UNESCO designation of the Valentia Island Cable Station (and its environs).it states that further work on UNESCO designation of the Valentia Island cable station should be halted until the island people are consulted and a vote is taken. The submission raises concerns about the lack of information and consultation provided by the UNESCO foundation and the associated local private development company.</p>	<p>VI-05 (a) Protect the key cable sites at the old Slate Yard and ‘First Message’ (1858) building in Knightstown including the visual corridor from the harbour, the Cable Station building (1868), Knightstown, and the remains of the 1866 building on the Telegraph Field at Foilhommerum.</p> <p>(b) Facilitate and support the conservation and presentation of these sites in accordance with Department of Culture, Heritage and Gaeltacht and UNESCO guidance.</p> <p>This structure was proposed for addition to the RPS on the basis of its special architectural and social categories of interest. The architectural style of this building is most distinctive and significantly adds to the character of Knightstown. It should be highlighted that Kerry County Council administers conservation grants for conservation-led upgrading and renovation of protected structures. As a protected structure, the owner would be eligible to apply for this grant-aid. The designation of a structure as a protected structure does not impede its redevelopment but seeks to achieve a high-quality design and finish maintaining the inherent character of the structure.</p> <p>It is not recommended to omit this structure from the RPS.</p>
<p>KE-C1-332 Valentia Island Dev Co Limited by guarantee</p> <p>KE-C1-348 Lucian Horvat</p> <p>KE-C1-343 martin moriarty</p> <p>KE-C1-360 Atlantic Villa</p> <p>KE-C1-376 Fiona Lyne</p> <p>KE-C1-390 Valentia Transatlantic Cable Foundation</p>	<p>This submission supports the UNESCO accreditation application for Valentia Island Transatlantic Cable Building. It states that a major deliverable in this project is in the restoration and refurbishment of the historic Cable Station at Knightstown in Valentia. It states that collaboration with officials in Newfoundland is currently taking place to pursue a trans-national application for UNESCO heritage status for both Irish and Canadian sites, thus bonding the two communities together. There is expected to be significant economic impact with a significant increase in the number of tourists and the type of tourist which is expected to extend the tourism season beyond current limits.</p>	<p>The support for the designation of Valentia Trans-Atlantic Cable Station as a UNESCO site is welcomed as set out by Objective KCDP 10-62 of the Draft Plan.</p>
<p>KE-C1-147 Tarbert</p>	<p>It states that over the years North Kerry has been totally neglected as a tourist destination. It requests that the Council withdraws the Landscape Character Assessment stated, must</p>	<p>The Local Authority acknowledges the role North Kerry plays in its tourism offering for the county, from the historical, heritage and outdoor</p>

<p>Development Association</p>	<p>support the area in relation to its tourism potential into the future. The road infrastructure from the N69 to reach the beaches needs upgrading, Adequate modern toilet facilities and car parks are essential to encourage tourism in this area.</p> <p>Niche sectors such as Adventure tourism, Eco tourism, adventure travel including cultural exchanges and hill walking etc need to be encouraged and supported for the North Kerry area. These Niche sectors would lengthen stays and help extend the tourist season as they are less weather dependent than other forms of tourism</p>	<p>recreational facilities of the key town of Listowel to the seaside towns of Ballybunion 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>Section 10.4.1 of the Draft Plan relates to Adventure Tourism with Objective KCDP 10-33 specifically related to this type of tourism.</p>
<p>KE-C1-358 Cllr. Breandán Fitzgerald</p>	<p>The submission requests further investment in beaches, historical site and scenic amenities and requests Kerry County Council to employ Guides during the summer months.</p>	<p>The Council recognises the value of blue flag beaches, historical sites and scenic amenities; however, it is not considered appropriate within the remit of the Draft Plan to set out for the employment of Guides during the summer months.</p>
<p>KE-C1-363 NEWKD</p>	<p>The submission welcomes that the enormous potential of Ballybunion and North Kerry are now seen as a quality tourism product.</p>	<p>The support is welcomed. Also see response to Submission KE-C1-215.</p>
<p>KE-C1-199 Dingle Business Chamber</p>	<p>The submission seeks that support is provided to implement Dingle's Sustainable Tourism Strategy and there should be engagement and support from relevant bodies.</p>	<p>See Response to Submission KE-CE-279 Failte Ireland.</p> <p>The Council will engage with all stakeholders regarding this.</p>
<p>KE-C1-68 Dan Smyth</p>	<p>To enhance the current Sli Na Slainte by the installation of LED lighting running parallel to the main Farranfore to Tralee Road.</p>	<p>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>KE-C1-273 Maura Healy-Rae KE-C1-314 Danny Healy-Rae KE-C1-147 Tarbert Development Association</p>	<p>These submissions request support for local communities in the development of walking trails and an objective in relation to 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.</p>

<p>KE-C1-127 Farranfore Development Association</p>	<p>A local greenway could be developed on the site of Farranfore Junction on the lands still in CIE ownership, back to beyond the location of the turntable. This greenway would be linked via the Farranfore Railway Park to the Farranfore Sli na Slainte on the L-11047-0. This would provide a safe off-road loop for cycling and walking.</p> <p>-Facilitate and encourage the further development and extension of dedicated walk and cycle ways within Farranfore, with the local hinterland and neighbouring villages such as Firies, Currow and Currans, as well as major population centres of Tralee, Killarney, Castleisland and Killorglin.</p>	<p>Comments in relation to the potential for further greenways and/or similar projects in the county are noted. This is specifically addressed in the existing Chapter 10 & 14 of the CDP. 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>KE-C1-275 Johnny Healy- Rae</p>	<p>The submission seeks the provision of public toilets on all blue flag and busy beaches.</p>	<p>It is the policy of the Council to provide public toilets and other facilities on all blue flag and busy beaches. Objective KCDP 10-53 seeks 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>KE-C1-231 MacGillycuddy Reeks Mountain Access Forum</p>	<p>The MacGillycuddy Reeks Forum welcome its inclusion in the objectives of the draft plan. This submission requests that the plan recognises and supports the role of farmers as custodians of the natural resources of the countryside and the rural landscapes. Commonage and other rough grazing land should be managed with consideration of the sensitive habitats. Support the preservation and maintenance of existing routes through the MacGillycuddy reeks. Footfall access should be encouraged along predefined access routes to protect habitats. Any new developments should take into consideration the long-term maintenance requirements and impact to the landscape and the sensitive habitats contained therein.</p>	<p>Submission is noted. Chapter 11 supports the Forum and its objectives. Furthermore, the Biodiversity Action Plan in Volume 6 has a specific action to support the forum. The CDP however does not oversee agriculture use of the land and this falls within the remit of the Department of Agriculture. As regards walking and hiking, again this activity is not overseen by the CDP. However, the CDP does support the sustainable development of walking and other outdoor activities and associated infrastructure – including paths, signage etc – at appropriate locations and further to the principles of proper planning and sustainable development. Policy and objectives in relation to the protection of ecologically sensitive habitats/areas are specifically detailed in Chapter 11 of the CDP. The Planning Authority is obliged to ensure all plans and projects/developments implemented and/or consented to by the Local Authority are in compliance with applicable EU and National nature conservation legislation, notably the EIA, Habitats and Water Framework Directives as transposed in National legislation.</p>
<p>KE-C1-358 Cllr. Breandán Fitzgerald</p>	<p>The submission seeks the maintenance of existing coastal walks, against coastal erosion, and provision of blueways.</p>	<p>KCDP 10-2 Facilitate sustainable tourism development throughout the County and particularly in areas where tourism is currently underdeveloped and where there is a need for local tourism development initiatives including Greenways, Blueways, Peatways, Cycleways, Walkways and Marine Leisure. Section 11.4.2 deals with coastal erosion and Objective KCDP 11-68 seeks to support measures for the management and protection against coastal erosion.</p>
<p>KE-C1-109 Tina and Barry Godley</p>	<p>The submission states that the definition of agri-tourism needs to be broadened. It further states that smaller farmers could stay in business by supplementing their farm incomes via</p>	<p>Kerry County Council is fully supportive of farm diversification and acknowledges the importance of this to rural communities. It is the policy of the Council, supported by KCDP 9-41, to support rural</p>

	agri-tourism offerings and should take account that some farms do not have these older buildings to redevelop for agri-tourism.	development and facilitate farm diversification and new employment / enterprise opportunities within the agriculture sector, subsidiary to agricultural uses. KCDP 10-64 states “Support sustainable agri-tourism initiatives in the form of on-farm or farm related tourism developments” across a broad range of areas.
Recommendations No proposed amendments.		

Chapter 11 – Environment

Chapter 11 – Environment - Introduction		
	Submission Summaries	CE Response and Recommendations
KE-C1-48 Keep Ireland Open	<p>This submission deals with issues and suggestions regarding access to and the protection of heritage, the countryside and the provision of walking and cycle routes for recreational purposes.</p> <p>A number of Policy interventions and additions are suggested and examples are drawn from a number of other Local Authority Development Plans.</p> <p>It must be noted this detailed submission includes numerous separate and specific suggestions for new objectives or amendments to existing objectives. It is considered that many of the suggestions are reiterations and duplications. The reader is therefore advised to read the submission in full using the submission link.</p>	<p>Some suggestions such as byelaws and the creation of ROWs etc. are outside the remit of the Development Plan and cannot be considered.</p> <p>A number of the wording changes proposed relate to wording taken directly from statutes / guidelines, other plans and policy documents such as the Climate Action Plan, Local Authority development Plans and the NPF. It is not considered appropriate to make changes to text that refers to or is a direct quote from another document. A number of the changes suggested in this submission are also considered to be overly prescriptive and would not allow for sufficient flexibility in the implementation of the plan.</p> <p>With respect to ‘walking routes’, if these are not legally PROWs or have other legal designation / protection, it would be excessively onerous and possibly ultra vires to require their protection.</p> <p>Walking routes; All of the suggestions relating to ROWs, walking routes etc. have been carefully considered. It is considered these goals are addressed adequately in the draft plan, insofar as it is considered possible and reasonable, staying within the remit and confines of a land-use and spatial plan.</p> <p>Rights of Way; Section 10(2)(o) of the PDA 2000 in summary requires Planning Authorities to identify and include objectives in their County Development Plans, for the preservation of existing public rights of way</p>

		<p>[PROWs] which give access to places of natural beauty/recreational utility, by marking such routes on maps and indicating their location-description of their character on a list therein. This statutory provision does not equate with the ‘registration of rights of way’ which is provided for under PART 8 of the Land and Conveyancing Law Reform Act 2009 with respect to other forms of easements including Private Rights of Way.</p> <p>Local historical customary routes such as mass paths and estate roads do not in all cases equate with the essential legal principles to establish or declare that a particular route-way/trackway/lane is a PROW. In accordance with Section 14(7) (a) of the PDA 2000, the non-inclusion of a particular route-way for preservation as a PROW in a Development Plan, shall not affect the existence or validity of the possible status of that route as a public right of way.</p> <p>Where a known PROW exists on any land for which permission is being sought to develop, it is a normal part of the development management process to evaluate the impact (if any) of the proposed development on any known PROW and to require proposals to address any such impact, which normally includes measures to protect and maintain the existing PROW.</p> <p>It is not considered necessary therefore to amend the plan, given the policies and objectives already included.</p> <p>Cycling; Chapters 4, 10 and 14 contain a range of policies and objectives that seek to integrate transport and land use, promote walking, cycling and public transport (which are key to addressing climate change). The plan also prioritises the enhanced promotion and development of safe greenway cycling routes, and attractive walking and hiking routes and other outdoor activities for all ages and abilities.</p>
<p>KE-C1-346 Kerry Green Party</p>	<p>The submission seeks the inclusion of an additional Objective which would state “Breaches of legislation to protect Kerry’s environment will be prosecuted by KCC or a report will be sent to the relevant body for prosecution, which will be supported by KCC. Cases of malpractice by contractors must be prosecuted”, as enforcement of environmental law is a vital issue which must not be overlooked.</p>	<p>The role and responsibility of the council as regards enforcement of various environment legislation is laid out in relevant legislation – planning, waste, water etc. Within its role and functions, the council already investigates and prosecutes many non-compliances with relevant legislation.</p>
<p>KE-C1-346 Kerry Green Party</p>	<p>The submission seeks the inclusion of an additional Objective which would state “Empower local communities to tackle climate action. Work with Transition Kerry to build on the work</p>	<p>The plan strongly supports all communities and groups to empower them to engage with and tackle climate action. The naming of individual groups within the CDP is not deemed necessary as the plan seeks to be</p>

	done to-date in building a network of sustainable communities” as this has the potential to share knowledge and resources.	inclusive and support all groups/individuals across the county. Chapter 10 & 11 provides objectives to support community-led projects, specifically those with a focus on the environment/climate action. The CDP also 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 all stakeholders where possible.
KE-C1-111 Mol Teic (t/a Dingle Hub)	Please note that KCDP 11-6 and KCDP 11-7 are identical.	Comments noted; however, a review of the relevant objectives indicate the objectives are different, KCDP 11-6 refers to funding and KCDP11-7 to provision of information at heritage sites.
Recommendations No Recommendations recommended		

Chapter 11 – Environment - Biodiversity		
	Submission Summaries	CE Response and Recommendations
KE-C1-74 Irish Hen Harrier Survey	This submission relates to the hen harrier, associated protected habitats and the harrier breeding cycle.	<p>The importance of winter roosting sites to the Hen Harrier Population, as outlined 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>Recommendation The following to be added to Volume 1, S11.2.1: <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>
KE-C1-14 Killarney Salmon & Trout Angling Club	The submission requests that there is a need to be included in the plan a prohibition on licencing of fish farms in estuaries on the Kerry that have rivers flowing through them. They raise this issue in regard to the protection of native wild salmon and sea-trout stocks and the impact fish farming of such fish species can have on native populations in terms of the spread of disease.	Licencing of fish farms and matters in relation to developments on the foreshore are a matter for the Minister under the foreshore act. However, it is an objective of the Draft Plan [KCDP 11-15] to facilitate, in collaboration with relevant stakeholders increased awareness and the implementation of biosecurity measures to prevent the spread of invasive species, particularly along watercourses.
KE-C1-339 Paul Lynch	This submission relates to a derelict building at Banna Beach. The submission requests that the building known locally as ‘The Shop’ and adjoining site curtilage is excluded from the SAC & Akeragh, Banna and Barrow Harbour SPA 004079, to facilitate remediation and	It is not within the remit of the CDP to amend these environmental designations which have a statutory basis. However, the designation of the site within an SAC & SPA does not preclude redevelopment.

	re-development of the site to provide a fitting and appropriate gateway building, while incorporating modern facilities at the entrance to Banna Beach.	
KE-C1-211 Steve Edwards	The submission states that the Ballyduff to Lixnaw area holds a wealth of heritage sites and a bog that is a unique wildlife sitting between the Lower Shannon Estuary SAC and the Stacks to Mullaghereirk mountains/ West Limerick Hills SPA. The submission states that Section 11.2.3 provides valid justifications for wetland conservation but should also include another objective that stipulates that no large-scale disruption of peat takes place in any industrial operation (wind farm or otherwise) that leads to the release of sequestered carbon dioxide or other greenhouse gases contained within. The submission supports Objectives KCDP 11-1 to 11-9.	<p>The importance and multi-functionality of wetlands is recognised in the plan with specific policy relating to wetlands outlined in Section 11.2.3. Chapter 2 and Chapter 11 provide further 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 climate action.</p> <p>In addition, objection KCDP 2-10 seeks to Support nature-based solutions to climate change challenges and also initiatives aimed at increasing soil carbon retention, sequestration, and storage.</p>
KE-C1-380 MARTIN MULVIHILL	The submission requests that any green infrastructure such as trees planted in the past few years within Moyvane are to be left intact.	<p>Submission is noted, however the management of trees, including any proposed felling falls within the scope of the Forestry Act, and therefore is not a matter for KCC or the CDP.</p> <p>As regards green infrastructure, policies and objectives relating to same are outlined in Chapter 11 of the plan and also in the Biodiversity Action Plan and the policies and objectives seek to retain, protect and enhance green and blue infrastructure in our towns and villages.</p>
KE-C1-295 Johnny Healy-Rae	The submission requests that Kerry County Council would include in the Plan that all roadside trees would be cut back a safe distance from roadside.	It is the responsibility of landowners to ensure that all hedgerows and trees in their ownership fronting onto the public road network are maintained. The Council will engage with landowners in this regard through the M.D. enforcement officers.
KE-C1-80 Kerry IFA	<p>- Consultation with local residents and representatives should be held to identify areas at bare minimum junctions and pinch points which need to maintain a level of hedge-cutting especially during the summer "Silage Season" to enhance visibility for road users to ensure pedestrian and vehicular safety.</p> <p>- In the interest of public safety Kerry IFA request that the Council take responsibility to remove both large and dangerous roadside trees.</p>	See response to KE-C1-295.
KE-C1-94 mary mahony KE-C1-190 John O'Grady KE-C1-402 Brendan O Grady KE-C1-420 Mary Behan	The submission states that the aims of the plan must be considered when assessing application that could impact on the wetlands, rivers and water courses in the County, both with respect to encouraging tourism into the county and the protection of the county's wildlife and habitats. Kerry County Council must ensure that any developments in ecologically sensitive areas fully comply with EU Directives. Bogs which store large amounts of carbon underground must also be protected.	It is the policy of the council to promote and facilitate county based and cross-county engagement with all stakeholders in order to encourage and facilitate the retention and creation of features of local biodiversity value, ecological corridors and networks that connect areas of high conservation value. The Planning Authority is also obliged to ensure all plans and projects implemented and/or consented to by the Local Authority are in compliance with applicable EU and National nature conservation legislation, notably the EIA, Habitats and Water Framework Directives as transposed in National legislation. As regards wetlands, the

KE-C1-425 Patrick J. Gilbert		importance and multi-functionality of wetlands is recognised in the plan with specific policy relating to wetlands outlined in Section 11.2.3. The policies in the plan and BAP are therefore considered sufficient.
KE-C1-433 Lixnaw Wind Aware Group, Luachra wind awarness group, Tullamore action Group, North Kerry Wind Turbine Awareness Group	KCC must ensure that any developments in ecologically sensitive areas fully comply with EU Directives.	Policy and objectives in relation to the protection of ecologically sensitive areas are specifically detailed in Chapter 11 of the CDP. The Planning Authority is obliged to ensure all plans and projects/developments implemented and/or consented to by the Local Authority are in compliance with applicable EU and National nature conservation legislation, notably the EIA, Habitats and Water Framework Directives as transposed in National legislation.
KE-C1-93 mary mahony	The submission states that objective KCDP 11-22 is a great start and it is encouraging to see the plan mention “buildings can incorporate biodiversity through features such as green roofs and living walls”. In considering the latter point, there are solutions that could be incorporated as conditions when considering planning applications such as swift/universal bricks and something similar is available for bats. KCC should lead out on this and ensure these types of solutions are incorporated in any Council-led builds at the very least.	It is the policy of the council to promote the creation of urban ecological corridors and support projects such as the swift nesting, pollinator friendly initiatives, tree planting, nature based sustainable urban drainage systems and other actions that seek to enhance urban wildlife. In particular Chapter 11, objective 11-22 supports the inclusion, where possible, of swift boxes and other biodiversity initiatives that seek to enhance urban biodiversity across the county. See also response to KE-C1-232.
KE-C1-92 mary mahony	The submission states that Kerry could be a leader in defining best practice when it comes to areas that are both Ramsar sites and SPAs. It states that waterbirds are being disturbed by dogs off leads and needs to be addressed in supporting the sustainable use of wetlands with regular inspections by KCC authorised persons/dog wardens.	The importance and multi-functionality of wetlands is recognised in the plan with specific policy relating to wetlands outlined in Section 11.2.3. It should be noted that the designation of SPAs and Ramsar sites and the management of same, is outside the scope of the CDP and/or Kerry County Council. Their management is not within the remit of the Local Authority. However, it is the policy and objective of the Council to ensure that the requirements of relevant EU and national legislation, are complied with by the Council in undertaking all its own functions and responsibilities, including the requirements of the EU Birds and Habitats Directives.
KE-C1-90 mary mahony	The submission welcomes the inclusion of Objective KCDP 11-15 and states that KCC should ensure that it is a condition of planning that landscaping in planning developments do not introduce invasive species, and instead should incorporate landscaping of native plant species and if possible, locally sourced.	Section 11.2.4 deals with invasive species and further policy details are included in the Biodiversity Action Plan (see vol6). It is considered that these policies and objectives (11-14 to 11-16) are adequate to stop/reduce the introduction/spread of the invasive species.
KE-C1-91 mary mahony	The submission states that the Local Authority should commit to further projects implementing the pollinator plan in public areas and documenting them on Biodiversity Ireland website to enhance and protect Biodiversity.	Chapter 11 outlines the policies and objectives that support biodiversity initiatives in the county. It is the policy of the Council to support actions from the All-Ireland Pollinator Plan and the Biodiversity Action Plan including the plan’s recommendations for grassland management and

		<p>pollinator friendly species. The Council will also cooperate with all stakeholders on local initiatives for the enhancement of public realm and the creation of ecological corridors.</p>
<p>KE-C1-135 Linda Edwards</p>	<p>The submission raises several points in relation to biodiversity (1) The plan must consider the impact any application that could have on the wetlands, rivers and water courses in the County, both with respect to encouraging tourism into the county and the protection of the county's wildlife and habitats. (2) developments in ecologically sensitive areas fully comply with EU Directives, particularly the Birds and Habitat directives EU Habitats Directive (92/43/EEC) and Directive 2009/147/EC. (3) Protection must be afforded to all rivers, lakes and watercourses both to ensure a clean water supply to business and homes but also to ensure that rivers and lakes comply to EU standards. (4) Due to the increase in pesticides and habitat loss, pollinators and other insects are in decline, the planting of native broadleaf trees and hedgerows should be encouraged to help protect and encourage all insects and wildlife. (5) Planning granted for housing developments should include an obligation to provide green spaces and to plant native species. Greenways will also encourage and provide protection for wildlife and insects, planted with native species.</p>	<p>The importance and multi-functionality of wetlands is recognised in the plan with specific policy relating to wetlands outlined in Section 11.2.3. The plan supports the protection of wetlands as defined in the regulations and in the Draft Guidance for Planning Authorities on Drainage and Reclamation of Wetlands, Department of Environment, Community and Local Government, 2011 (or future versions).</p> <p>The plan encourages and facilitates the conservation, retention and creation of features of local biodiversity value, such as wetlands. The Council will consider development proposals for unique tourism offerings subject to the protection of the integrity of the natural heritage of the County. Objective KCDP 10-69 seeks to facilitate and support the sustainable development of the tourism sector and provide for the delivery of a unique combination of niche tourism opportunities and potential future attractions in County Kerry.</p> <p>Policy and objectives in relation to the protection of ecologically sensitive areas are specifically detailed in Chapter 11 of the CDP. The Planning Authority is obliged to ensure all plans and projects/developments implemented and/or consented to by the Local Authority are in compliance with applicable EU and National nature conservation legislation, notably the EIA, Habitats and Water Framework Directives as transposed in National legislation.</p> <p>Policy and objectives in relation to the protection of water quality are specifically detailed in Chapter 13 of the CDP. There is an overarching requirement for the LA to ensure compliance with the Water Framework Directive.</p>
<p>KE-C1-482 Transition Kerry</p> <p>KE-C1-410 Crainn Chiarraí</p>	<p>This submission that the plan should prioritise the role of Biodiversity.</p> <p>Suggested Text</p> <p>Change the title of chapter 11 to 'Environment & Biodiversity'.</p> <p>11.2.6 Green and Blue Infrastructure - Ecological / Urban Blue Corridors</p> <p>Suggestions and Text for Extra Objectives</p> <p>- Priority be given to the development and implementation of the proper recording, mapping, management and protection of existing mature trees and hedgerows, both urban and rural.</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>

	<ul style="list-style-type: none"> - Designate and officer with responsibility to introduce Tree Preservation Orders. - Designate a person responsible for Hedgerow Protection Orders, Cutting and Management. - Designate a person responsible for Habitat Site Protection Orders and Enforcement. - Introduce and use the procedures around Tree Preservation Orders to protect existing mature trees. - Support 'Biodiversity Mentors' who will work with communities - Include and prioritise local and appropriate nature-based solutions based around the existing habitats and ecosystems in the area in all habitat maps. - Prioritise the role of ecological corridors which connect habitats together. <p>11.2.7 Urban Ecology</p> <ul style="list-style-type: none"> - Give priority to the protection of existing urban trees and hedges as part of an integrated nature-based solutions approach all over the County, which assists with urban drainage, reduces flooding and improves local water quality. - Give priority to the planting of native trees and shrubs in urban areas due to their critical value to wildlife. <p>11.2.5 All-Ireland Pollinator Plan 2021-2025</p> <ul style="list-style-type: none"> - Give priority to the planting of native trees and shrubs in urban areas due to their critical value to pollinators. - Support community groups in protecting their local mature trees with Tree Preservation Orders. - Develop connections between existing urban 'biodiversity & climate resilience hotspots' such as Tralee Bay Wetlands and local community allotments and gardens. <p>11.2.7 Woodlands and Trees</p> <ul style="list-style-type: none"> - Carry out public consultation in relation to the development of Tree Strategies. - Develop a Tree Strategy for the County and each Municipal District. - Support communities in the process of Tree Preservation Orders around the County. - Biodiversity Officer role - to work with biodiversity mentors and communities. - Prioritise these woodlands by making small woodlands bigger and connecting them through ecological corridors. 	<p>Vol. 6 KCC's Biodiversity Action Plan and Chapter 11 (specifically objectives KCDP 11-18 - 11-21) supports habitat mapping and further seeks to encourage and facilitate the retention and creation of features of local biodiversity value, ecological corridors and networks that connect areas of high conservation value such as watercourses, woodlands, hedgerows, earth banks and wetland. In addition, the plan strongly supports nature-based solutions provided for in both Chapter 11 and also within development management procedures outlined in Volume 6, Appendix 1.</p> <p>The comments in relation to various officers/posts to be promoted within the LA are noted. However, the CDP is a land use plan and staffing within the LA is outside its scope. However, the CDP does support collaboration between the LA and a wide range of stakeholders including any existing/future officers in the roles of Climate Action, Environmental Awareness and/or Biodiversity. The Biodiversity Action Plan specifically notes a key objective of the plan is for the biodiversity office to work with all stakeholders to ensure protection and enhancement of biodiversity in the county. As regards "biodiversity mentors" the submission is noted and the BAP will be amended as outlined below.</p> <p>The role and responsibility of the council as regards enforcement of various environment legislation is laid out in relevant legislation – planning, waste, water etc. Within its role and functions, the council already investigates and prosecutes many non-compliances with relevant legislation.</p> <p>The management of trees, including any proposed felling, falls within the scope of the Forestry Act. Kerry County Council however 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.</p> <p>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</p>
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		<p>District in the county. It is envisaged that these strategies will review potential Tree Preservation Orders based on best practices. As regards the creation of woodland see response to KE-C1-346.</p> <p>Recommendation 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....</p> <p>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>KE-C1-419 Marianne Browne</p>	<p>This submission recognises the content of the Draft plan and its emphasis on Biodiversity.</p> <p>KCC must consider the aims of the plan when considering any application that could impact wetlands for example Ballynagare bog and the Sister's Bog in Lixnaw. These living bogs are of great importance for biodiversity, flood control and control of carbon emissions. North Kerry needs to recognise and safeguard the economic value of raised bogs and protect them from wind development. Prioritise the protection of water quality and habitats and this will encourage tourism. Green infrastructure is crucial to improve the connectivity of Natura 2000 networks on land.</p> <p>Additional details were given about the EU Biodiversity Strategy for 2030 and the Convention on Biological Diversity, The European Green Deal , Environmental Action Plan (EAP), UN Sustainable Development Goals, EU Red List Assessments and Article 17 reports, Water Framework Directive (WFD), Marine Strategy Framework Directive (MSFD), Accounting for ecosystems and their services in the EU - INCA - 2021 edition, UN Statistical Framework 2021,Ballynagare Glebe, and the raised bog of Lixnaw,</p>	<p>The importance and multi-functionality of wetlands is recognised in the plan with specific policy relating to wetlands outlined in Section 11.2.3. Chapter 2 and Chapter 11 provide further 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 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>The Planning Authority is already obliged to ensure all plans and projects implemented and/or consented to by the Local Authority are in compliance with applicable EU and National nature conservation legislation, notably the EIA, Habitats and Water Framework Directives as transposed in National legislation.</p> <p>As regards green infrastructure, policies and objectives relating to same are outlined in Chapter 11 of the plan and also in the Biodiversity Action Plan. Policy/objectives seeks to retain, protect and enhance green and blue infrastructure in our towns and villages.</p> <p>The BAP, included in Volume 6, provides details on how the biodiversity policy outlined in the document aligns with International, European and National policy as noted in the submission.</p>
<p>KE-C1-410 Crainn Chiarraí</p>	<p>This submission lists a number of trees that should have Tree Preservation Orders on them:</p>	<p>The submission is noted. 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</p>

<p>KE-C1-409 Clementine O'Keefe</p>	<ol style="list-style-type: none"> 1. Lime Tree, Moyderwell, Tralee 2. Yew Tree in Muckross Abbey 3. Tree on Dingle Way 4. Trees in Tralee Town Park <p>The submission also included an extract from the judges report for Tidy Towns Adjudication 2021 which highlighted the inappropriate management of mature trees in Tralee.</p>	<p>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.</p> <p>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 based on best practices. As regards the creation of woodland see response to KE-C1-346.</p>
<p>KE-C1-397 North Kerry Environmental Forum /Association</p>	<p>The Submission welcomes the objectives in relation to Biodiversity, particularly Objective 3 "that biodiversity underpins KCC's response to the challenges of climate change".</p>	<p>Submission is noted and support for the objective is noted.</p>
<p>KE-C1-374 Peter Malone KE-C1-369 Peter Malone</p>	<p>The submission states that the Local Authority should be firm in following the principles and goals laid down in the Plan as otherwise these goals will never be achieved. The submission provides an example of a recent planning decision which shows how these aims are diluted and not applied, by not enhancing biodiversity as set out as an objective of the Plan. The submission further states that all of the county's natural environment is important not just SACs and SPAs and provides an example of The Milltown River Habitat which should be acknowledged and promoted in the Plan.</p>	<p>Policy and objectives in relation to the protection of ecologically sensitive areas are specifically detailed in Chapter 11 of the CDP. The Planning Authority is obliged to ensure all plans and projects/developments implemented and/or consented to by the Local Authority are in compliance with applicable EU and National nature conservation legislation, notably the EIA, Habitats and Water Framework Directives as transposed in National legislation.</p> <p>The CDP also supports the protection of sites of local ecological value which includes rivers and our coastal waters. Policy and objectives in relation to the protection of water quality are specifically detailed in Chapter 13 of the CDP. There is an overarching requirement for the LA to ensure compliance with the Water Framework Directive.</p>
<p>KE-C1-346 Kerry Green Party</p>	<p>The submission seeks the inclusion of an additional Objective which would state "The public is encouraged to submit observations of illegal habitat destruction or malpractice which impedes on the integrity of the county's biodiversity", as this is a particular issue in rural areas due to the dispersed populations.</p>	<p>The role and responsibility of the council as regards enforcement of various environment legislation is laid out in relevant legislation – planning, waste, water etc. Within its role and functions, the council already investigates and prosecutes many non-compliances with relevant legislation.</p>
<p>KE-C1-346 Kerry Green Party</p>	<p>The submission seeks the inclusion of an additional Objective in Section 11.2.3 which would state "Protect and enhance wetlands as nature-based solutions to flood</p>	<p>The importance and multi-functionality of wetlands is recognised in the plan with specific policy relating to wetlands outlined in Section 11.2.3.</p>

	management, climate change, and the biodiversity crisis” as wetlands can provide benefits with regard to water shortage, flood management, water treatment, enhancing biodiversity and carbon storage	<p>However, the addition of the objective as suggested is deemed appropriate.</p> <p>Recommendation Add a new objective to Section 11.2.3 ; <i>Facilitate and support the protection and enhancement of wetlands as nature-based solutions to flood management, climate change, and the biodiversity crisis.</i></p>
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of two additional Objectives in Section 11.2.4 in relation to invasive species which would state “Raise awareness of the rhododendron crisis and actively support any groups endeavoring to eradicate invasive species in the Killarney National Park (particularly Rhododendron), such as Groundwork” and “Develop an invasive species policy for Kerry, to include a public and contractor awareness campaign, as well as public species recording and guidance on what to do when invasive species are discovered”.	<p>National legislation pertaining to invasive species is specified in the provisions of the EC (Birds and Habitats) Regulations (SI 477 of 2011). The SI provides the legislative framework for the management of all invasive species as listed in Schedule 3. <i>Rhododendron ponticum</i> is just one of several invasive species listed. Therefore, is not deemed appropriate to restrict policy in the CDP to one species. It is recommended to maintain the terminology as used in the plan and not restrict policy as requested in the submission.</p> <p>As regards the CDPs overarching policy on invasive species, this is outlined in Section 11.2.4 and further policy details are included in the Biodiversity Action Plan (see vol6). This includes an action to work will any group involved in the management of invasive species. It is not deemed necessary for the plan to name all possible groups. It is considered that these policies and objectives (11-14 to 11-16) are adequate to stop/reduce the introduction/spread of invasive species. Finally, the ownership and management of Killarney National Park is the responsibility of the NPWS. The council will facilitate and support the NPWS in relation to the management of invasive species.</p>
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional Objective which would state “Ensure the protection of the biodiversity and tourism-value of Killarney National Park by proactively engaging with all stakeholders to tackle the critical problem of the expanding Rhododendron infestation, by promoting awareness of the importance of not starting fires anywhere within or near the National Park, by proactively investigating and acting upon any cases of illegal fires including gorse fires, and undertaking all necessary measures to ensure the thriving of one the last remaining temperate rainforests in Ireland”, given the significant value of the National Park.	<p>It is considered appropriate to include a new objective which would states the following:</p> <p><i>“Support the protection of the biodiversity and tourism-value of Killarney National Park by proactively engaging with all stakeholders to tackle Rhododendron infestation and combating illegal fires”</i></p>
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional Objective in Section 11.2.6 which would state “Identify biodiversity hotspots in proximity to each other which could benefit from creation of ecological corridors and actively seek to create these corridors” as developments must have regard to biodiversity.	<p>Submission is noted. Chapter 11 of the CDP specifically objectives KCDP 11-18 - 11-21 supports habitat mapping and further seeks to encourage and facilitate the retention and creation of features of local biodiversity value, ecological corridors and networks that connect areas of high conservation value such as watercourses, woodlands, hedgerows, earth banks and wetland i.e., “biodiversity hotspots”. Therefore, the policies in the plan and BAP are considered sufficient.</p>

<p>KE-C1-346 Kerry Green Party</p>	<p>The submission seeks the inclusion of three additional Objectives in Section 11.2.8 which would state “Create native woodlands which are accessible to all by supporting communities and working with stakeholders”, “All schools in the county must be made within walking distance of a native woodland amenity. To this end, the council will support initiatives aimed at creating these woodlands (suitable sites can be identified through mapping exercises)” and “Survey all council lands, and where suitable for planting, native species are to be planted to create woodland amenities” for biodiversity.</p> <p>The submission seeks the inclusion of an additional Objective in Section 11.2.8 which would state “Penalise destruction of native woodlands and trees Under Wildlife Act 1976 to 2018 and Forestry Act 2014”, to enhance biodiversity</p>	<p>The placement of schools in the county is a joint responsibility between the Department of Education and the Planning Authority. Both work together in order to ensure that appropriate land is zoned to meet future school requirements. While zoning of specific lands falls within the scope of Local Area Plans, in line with National policy, future lands zoned for education in the county are required to be located as close as possible to community facilities such as sports facilities. In addition, the Planning Authority and Department of Education are obliged, as per the 2008 Code of Practice on the Provision of Schools and the Planning System, to ensure that school sites are fit for purpose in terms of their location, access to services and the provision of space for recreational and sports activities which can help to support an effective learning and development environment for children, in line with the Department of Education requirements. Therefore, policy cannot specifically demand that schools be located near amenity woodland.</p> <p>It should be noted that forestry in Ireland is overseen by the Forestry Service and under the provisions of the Forestry Act, as amended. The Forestry Act provides provisions for both the planting and felling of forests/woodland in Ireland. As regards the Wildlife Act, provisions under this act fall within the remit of the NPWS. Therefore, any offences committed under the above Acts are not within the remit of the LA. However, the LA will endeavor within its own remit, as detailed in Chapter 9 and 11, to support sustainable forestry practices in Ireland. As regards other points raised in the submission it is deemed appropriate that the <i>Creation of Woodland on Public Lands Scheme</i>, administered by the Department of Agriculture, Food and the Marine be supported in the CDP, as recommended below.</p> <p>Recommendation Add new objective to Chapter 11; <i>Support the Department of Agriculture, Food and the Marine’s Creation of Woodland on Public Lands Scheme, on public authority owned lands in the county at appropriate locations.</i></p>
<p>KE-C1-127 Farranfore Development Association</p>	<p>Continuing support should be provided to such work including, the current water courses in the area, namely the Féith Fionn are protected and allow for the potential development as a public amenity and positive visual focal point in Farranfore, through appropriate clearing and landscaping. Identify and appropriately treat and remove any Japanese Knotweed in the area</p>	<p>Policy and objectives in relation to the protection of waterbodies (coastal, river, ground and estuarine) are specifically detailed in Chapter 13 of the CDP. There is an overarching requirement for the LA to ensure compliance with the Water Framework Directive.</p> <p>The CDPs overarching policy on invasive species is outlined in Section 11.2.4 and further policy details are included in the Biodiversity Action</p>

		Plan (see vol6). This includes an action to work with any group involved in the management of invasive. However, it should be noted that the management of invasive species is the responsibility of the applicable landowner.
KE-C1-69 Lyreacrompane Heritage Group	<p>The Draft Plan should specifically express support for the rewetting of Lyreacrompane's blanket bogland and promote it as a major contribution to fighting climate change.</p> <p>The Draft Plan should give an initial exposure to the idea of a dark sky peatland reserve in the general Lyreacrompane (Ireland's first Dark Sky Peatland Reserve) area as a valid project in its own right with the added prospect of diversifying Kerry's tourist product.</p>	<p>The importance and multi-functionality of wetlands is recognised in the plan with specific policy relating to wetlands outlined in Section 11.2.3. Chapter 2 and Chapter 11 provide further 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 climate action. The CDP also 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>In addition, objective KCDP 2-10 seeks to Support nature-based solutions to climate change challenges and also initiatives aimed at increasing soil carbon retention, sequestration, and storage.</p> <p>The plan recognises the potential of the existing Kerry Dark-Sky reserve as a significant tourism attraction. The consideration of additional areas suitable for such designation can be further explored as part of the next LAP for the Lyreacrompane area.</p>
KE-C1-147 Tarbert Development Association	The protection of our natural assets and environment are vital for the future and this can be best achieved through education. While this is being done in schools there needs to be a much greater emphasis on adult education. Talks, for greatest effect should be at a local level, given by experts on areas such as water, biodiversity, habitat destruction etc. and these should be paid for by the state.	It is an objective under Vol. 6 Biodiversity Action Plan to increase awareness of Biodiversity and a commitment to use the PPN and established networks in furthering this aim.
<p>Recommendations</p> <p>The following to be added to Volume 1, S11.2.1: <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>Amend the Biodiversity Action Plan as follows: <i>Target 4.2 Works with the community, "biodiversity mentors" and other groups in the protection and enhancement of biodiversity...</i></p> <p>Add new Action <i>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.</i></p>		

Add a new objective to Section 11.2.3 ; *Facilitate and support the protection and enhancement of wetlands as nature-based solutions to flood management, climate change, and the biodiversity crisis.*

Add a new objective to Chapter 11: *“Support the protection of the biodiversity and tourism-value of Killarney National Park by proactively engaging with all stakeholders to tackle Rhododendron infestation and combating illegal fires”*

Add new objective to Chapter 11 ; *Support the Department of Agriculture, Food and the Marine’s Creation of Woodland on Public Lands Scheme, on public authority owned lands in the county at appropriate locations.*

Chapter 11 – Environment - Air, Noise and Light Pollution, Marine and Land Use & Flood Risk Management		
	Submission Summaries	CE Response and Recommendations
KE-C1-397 North Kerry Environmental Forum /Association	The submission welcomes the approach to noise pollution but states that it should all take account of not only future developments but also current developments. The submission states that the Local Authority need to take a pro-active approach to noise monitoring of all types of development, both day and nighttime activity.	Policies and objectives in relation to noise and noise pollution are outlined in Section 11.3.1. The Council will promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and will continue to manage environmental noise through land-use planning, traffic management and control of noise sources. This is to ensure that all future developments are designed and constructed to minimise noise disturbance. The council will also ensure that suitable measures to mitigate any nuisance are proposed and implemented.
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional Objective in Section 11.3 which would state “Ensure KCC’s procurement policy for new equipment meets best practice on air and noise pollution”, due to the health and environmental consequences of air and noise pollution.	Submission is noted; however, the CDP is a land use plan and cannot dictate procurement policy.
KE-C1-111 Mol Teic (t/a Dingle Hub)	Recognising the importance of having real-time and longitudinal data of emissions and, with the increasing availability of relatively inexpensive networked sensors to facilitate real-time monitoring, it is recommended that consideration be given to establishing remote real-time monitoring programmes across County Kerry, with real-time access to environmental data (and other information) available over the internet.	Submission is noted. The roll out of more locally based real-time environmental monitoring is being developed via National Policy. In particular, the EPA under its remit for the monitoring of air quality is already working with LAs in this regard. Kerry County Council has been involved with a new air monitoring device placed in Tralee town in 2019. The council will continue to work with all agencies in the pursuit of real-time environmental data.
KE-C1-147 Tarbert Development Association	Better management of our natural resources would need more inspections for industries that can cause pollution of air and water.	See response to KE-C1-346 Kerry Green Party.
KE-C1-40 Coiste Forbartha na Sceilge &	This submission outlines the erosion of the dunes at Ballinskelligs and also at Reenroe. The group ask that the surviving dunes be protected by large rock armoury at Ballinskelligs which will provide some protection from the tidal waves and damaging storms surges and	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, where possible will also work with local

<p>Ballinskelligs Environmental Action Group (B.E.A.G.)</p>	<p>regard this as a priority for the county and for the protection of the assets mentioned above.</p>	<p>stakeholders and community-based organisations to facilitate and support community led initiatives to protect the coastal areas from erosion in compliance with the Habitats and EIA Directives.</p>
<p>KE-C1-364 Cromane Community Council</p> <p>KE-C1-423 Castlemaine Harbour Co-Operative Society TTD</p> <p>KE-C1-418 Castlemaine Harbour Co-Operative Society TTD</p>	<p>The submission states that there has been no maintenance of the sea defences in Cromane for a number of years and many areas are at risk of flooding.</p> <p>The submission seeks the provision of a landing facility and associated necessary infrastructure at Cromane.</p>	<p>KCC does not own and is not responsible for the maintenance of the former Land Commission Embankment at Cromane. The Council will however continue to work with landowners, the OPW and allied stakeholders to ascertain if funding can be sought to assist the owners of the embankment with its maintenance. It is the policy of the Council to support and promote the sustainable development of the marine/aquaculture sector in order to maximise its contribution to employment and growth in coastal communities and the economic wellbeing of the County. The Council recognises the importance of the industry as a whole to the economy of the County and will continue to play a supportive role in the provision of landing facilities and associated infrastructure where necessary at appropriate locations throughout the county.</p>
<p>KE-C1-391 Cahersiveen Community and Business Alliance</p>	<p>The submission states that the plan should align more strongly with the Marine Spatial Planning framework 2021 and encourages engagement with Ireland's research institutes eg. MAREi, iCragg, Earth Institute, Marine Institute to ensure state of the art practices where existing data or policies may not reflect current or fast evolving needs.</p>	<p>The National Marine Planning Framework 2021 (NMPF) forms a framework for coordinated, integrated and transboundary approach to promote the sustainable development and growth of the maritime and coastal economies. The Council will seek to play an active part in implementing the objectives of NMPF. It is the policy of the council to support the integration of different uses in the marine environment and ensure consistency and alignment between high-level plans such as the National Marine Planning Framework, regional based approaches to maritime spatial planning and localised coastal management plans and local integrated coastal zone management plans – as informed by the research bodies noted in the submission. Ultimately, the CDP is a land based planning document. It is noted that the Marine Spatial Planning Framework will address planning issues within the marine environment including a new leasing regulatory framework. It is noted that synergies between the CDP and future marine legislation however is required. This is reflected in Section 11.4.1 of the plan which supports the alignment and integration of National, Regional and local Integrated Coastal Zone management as outlined above.</p>

KE-C1-397 North Kerry Environmental Forum /Association	The submission states that sand dunes in Ballybunion need to be included in the draft plan as they are an integral part of this natural habitat and coastal region.	The CDP supports the protection of all sand dune habitats and includes policy and objectives for same, specifically within Chapter 11, Section 11.4.
KE-C1-137 Liam Geary	The submission seeks more emphasis on coastal erosion.	Comments are noted. Section 11.4.2 and 11.4.4 address coastal erosion with six separate objectives. It is considered that both policy and these objectives sufficiently address coastal erosion concerns and provide a sufficient planning policy framework. Also as regards coastal flooding, Chapter 11, Section 11.5 outlines the LA's policy in relation to Land Use & Flood Risk Management. This provides the framework for how both strategic (land use plans) and project based (development management) flood risk assessments are to be undertaken including in coastal areas.
KE-C1-111 Mol Teic (t/a Dingle Hub)	<p>it is recommended that consideration should be given by the Council to developing:</p> <p>A standard for the facilities that should be available (and maintained) at all beaches (to include toilet facilities, drinking water, waste collection, etc.)</p> <p>The Plan should also include provisions that require, if large numbers of people wish to avail of access to the Blue Flag beaches, particularly during the high tourism season, that the Council is required to ensure that suitable facilities and arrangements are available in the area to protect the beaches, natural heritage and environment.</p>	The LA actively seeks to manage beaches and coastal areas particularly those in high use during the peak summer season. There are several objectives in the CDP that support same including an ongoing commitment to the protection of Blue Flag Beaches as outlined in Section 11.4.5. It is noted that in many of the county's beaches nature designations limit the potential for the provision of further facilities. Rather the LA seeks to sustainably manage existing facilities and seek solutions in collaboration with stakeholders including An Taisce and the local community.
KE-C1-199 Dingle Business Chamber	The submission seeks continued investment in Dingle Harbour & Piers and other local amenities. It also seeks that the Old Boatyard Site in Dingle is developed into a town community facility.	Policies and objectives supporting the development and improvement of piers are contained in Section 14.7 of the Plan. Specific objectives in relation to the Dingle Boatyard site are contained in the Corca Dhuibhne EA LAP 2021-2027.
KE-C1-364 Cromane Community Council	This submission highlights issues relating to the repair and reinforcement of existing embankments to protect the townlands of Lonart , Gloscha, Cromane Lower and Cromane Upper, including Liss and Stook island against flooding.	KCC does not own and is not responsible for the maintenance of the former Land Commission Embankments at Cromane, Lonart, Stookisland and Gloscha. The Council will however continue to work with landowners, the OPW and allied stakeholders to ascertain if funding can be sought to assist the owners of the embankment with its maintenance. It is the policy of the Council to support and promote the sustainable development of the marine/aquaculture sector in order to maximise its contribution to employment and growth in coastal communities and the economic wellbeing of the County. The Council recognises the importance of the industry as a whole to the economy of the County and will continue to play a supportive role in the provision of landing facilities and associated infrastructure where necessary at appropriate locations throughout the county.

		Sections 11.4.2 and 11.4.4 address coastal erosion with six separate objectives. It is considered that both policy and these objectives sufficiently address coastal erosion concerns and provide a sufficient planning framework. Also as regards coastal flooding, Chapter 11, Section 11.5 outlines the LA's policy in relation to Land Use & Flood Risk Management. This provides the framework for how both strategic (land use plans) and project based (development management) flood risk assessments are to be undertaken including in coastal areas.
KE-C1-363 NEWKD	This submission seeks the inclusion of additional wording to Objective KCDP 11-59 with the proposed inclusion of "and in consultation with people in communities likely to be affected by coastal flooding".	Comments noted. Consultation is a requirement of both planning and environmental legislation. As such consultation is already necessary and is open to all stakeholders regardless of their geographical location.
KE-C1-385 Cllr Jackie Healy- Rae	The submission seeks a review of flood risk areas as it states that CFRAMs identifies areas of flood risk when in fact there may have been no history of flooding on these sites yet they are effectively sterilised from any development.	The review of the CFRAM study which has resulted in the identification of areas at risk of flooding and is an invaluable planning policy tool is a matter for the OPW. Chapter 11, Section 11.5 outlines the LA's policy in relation to Land Use & Flood Risk Management. This provides the framework for how both strategic (land use plans) and project based (development management) flood risk assessments are to be undertaken. This includes the need for the LA to undertake its own SFRA. This has been undertaken. It is noted that the OPW and other submissions have been made on the SFRA which is being incorporated into the proposed amendments. This is based on the methodology outlined in the aforementioned 2009 guidelines which is National Policy.
KE-C1-199 Dingle Business Chamber	The submission seeks that plans and measures are drafted and implemented to save key parts of Kerry from further erosion and flooding.	Comments are noted. Section 11.4.2 and 11.4.4 address coastal erosion with six separate objectives. It is considered that both policy and these objectives sufficiently address coastal erosion concerns. Also as regards coastal flooding, Chapter 11, Section 11.5 outlines the LA's policy in relation to Land Use & Flood Risk Management. This provides the framework for how both strategic (land use plans) and project based (development management) flood risk assessments are to be undertaken including in coastal areas.
Recommendations		
No Changes Recommended		

	Chapter 11 – Environment - Landscape - Visually Sensitive Areas, Landscape Character Assessment and Views and Prospects	
	Submission Summaries	CE Response and Recommendations
KE-C1-402 Brendan O Grady	The submission states that the Landscape Character Assessment written by council in 2012 needs to be withdrawn to ensure that the wetlands in the county are preserved. The Landscape Character Assessment states that the majority of the landscapes of North Kerry	A Landscape Review of the County which replaces the 2012 Landscape Character Assessment is included in the Appendices to Volume 1. This process identified and described variations in the character of the

KE-C1-133 Linda Edwards	are 'not important for scenery, tourism or recreation'. This statement contradicts the County Development Plan stated aim to increase tourism into the whole of the county and to promote the Wild Atlantic Way as a holiday route for visitors to the area, both nationally and internationally, to explore and enjoy. The whole of the county needs to benefit from the promotion of Kerry as a viable tourism destination.	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.
KE-C1-433 Lixnaw Wind Aware Group, Luachra wind awarness group, Tullamore action Group, North Kerry Wind Turbine Awareness Group KE-C1-107 John O'Sullivan	The submission outlines the following: - The Landscape Character Assessment (2012) states that North Kerrys landscapes are not important for scenery, tourism or recreation and this is not mentioned in the CDP. It is unclear whether this LCA will continue or if it will be rescinded as it is not even mentioned in this CDP. - KCC webinar of 13.1.2022 states that tourism in the peripheral areas of the county offers the best economic future. This is an unbelievable turnabout considering KCC has zoned most of north Kerry in the LCA as not important for tourism. - there is no apology of any description in the CDP from KCC for the statements made in councils previous LCA regarding north Kerrys landscapes that were clearly abysmally wrong compared to the new CDP. -Copies of minutes of KCC management meetings which approved the statements in the LCA on the landscape value of North Kerry need to be made public.	A Landscape Review of the County which replaces the 2012 Landscape Character Assessment 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. The potential for tourism in all parts of the county including North Kerry is supported in the plan. This is specifically addressed in the existing Chapter 10 & 14 of the CDP. In addition, the Council's 2019 <i>Tourism Strategy</i> also acknowledges the potential of the county, including North Kerry, as a tourist destination and supports the facilitation of a number of tourism projects, specifically those relating to greenway/peatways and blueway projects.
KE-C1-218 Aidan Linnane	The submissions states that areas that have previously been zoned as "areas of little or no scenic value" should be reclassified as "areas of importance" e.g., Ballybunion etc. in the interest of tourism.	See response to Submission KE-C1-402. Visually Sensitive Areas are found across the county, including around Ballybunion.
KE-C1-179 Pádraig de Brún	The submission states that the emphasis on tourism as a principal criterion for the assessment of visual impact of developments suggests that local sensibilities are simply to be overridden, and indeed that locals in some areas of the county will only be on par with visitors if they become tourists themselves in more favoured areas.	Policy in relation to the assessment of development proposals in visually sensitive areas is outlined in Section 11.6.4 of the plan. This outlines a number of factors in addition to tourism that are taken into consideration in making decisions on proposals in visually sensitive areas.
KE-C1-125 Ruary Rudd KE-C1-175 Ruary Rudd	The submission seeks inclusion of the area from the entrance to the cable station to the entrance to the right of way from the N70 to Tech Amegin in Waterville, outlined on Map P, to incorporate the best views of the Ballinskelligs Bay. The submission also raises concern that the green area on the seafront within the village of Waterville is not protected as an amenity space.	The Landscape Review of 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. 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. The subject view is located along the Wild Atlantic way. It is the policy of the plan to protect the views and prospect and visually sensitive landscapes. It is considered appropriate to amend the Views & Prospects are per map included in the Appendix.

		The area referred to within the village of Waterville would be included in the Waterville Local Area Plan which forms part of the West Iveragh Local Area Plan 2019-2025 and is zoned G1, Open Space/Park.
KE-C1-46 Cllr. Charlie Farrelly	That all strategic Viewing Points in Co Kerry be developed to the highest standards, in order to showcase the Absolute Beauty of Co. Kerry	Submission is noted and the council will continue to support and work in consultation with any group that seeks to improve/enhance these viewing areas.
KE-C1-111 Mol Teic (t/a Dingle Hub)	While acknowledging the important role of 'sustainable tourism' and 'inward investment', it is recommended that primacy should be given to the importance of the landscape to maintaining the quality of life for the local communities (which can also support the development of local businesses), followed by tourism and foreign direct investment.	Comments in relation to the importance of landscapes is noted. The CDP supports the protection of landscapes as outlined in Chapter 11 informed by the <i>Landscape Review</i> provided in Volume 1, Appendix 7.
KE-C1-300 MWP	The submission requests the removal of an individual landholding from a proposed 'Visually Sensitive Area' designation.	A detailed landscape review of the County was undertaken as part of the CDP preparation process to identify countywide landscapes and views that should be protected from inappropriate development. Development is not precluded in these areas however particular care is needed to ensure that development in these areas does not damage the landscape. It is not considered reasonable to identify and remove particular areas from these designations based on land ownership. The subject lands are elevated and in conjunction with adjacent lands form an attractive and scenic landscape.
KE-C1-358 Cllr. Breandán Fitzgerald KE-C1-236 Michael O'Shea	The submission requests that each MD should be afforded the opportunity to assess the Visually Sensitive Area and Views & Prospects maps. Proposed views and prospects be removed completely or dramatically reduced.	The landscape review was undertaken at a countywide scale and involved the assessment of landscapes that transgressed several M.D. areas. Having regard to the expansive nature of the assessment it is considered that the appropriate location for its inclusion is in the CDP. County Kerry contains views and prospects of outstanding natural beauty which are recognised internationally and which make a significant economic contribution to the county. It is an obligation under Section 10(2)(ca) of the Planning & Development Act, to include objectives for the preservation of the character of the landscape, including the preservation of views and prospects and the amenities of places and features of natural beauty or interest. A detailed landscape review of the County has been undertaken which details visually sensitive landscapes and scenic views that should be protected.
KE-C1-192 Amy Rudd	This submission seeks the expansion of the designated visually sensitive areas in Waterville as per the attached map.	See KE-C1-175
KE-C1-190 John O'Grady KE-C1-420 Mary Behan	The submission states that the still applicable Landscape Character Assessment (2012) states that North and East Kerry's landscapes are not important for scenery, tourism or recreation and no change to this is mentioned in the plan. This contradicts the development plan stated aims to encourage tourism in the whole of the county and to	See response to KE-C1-402 and KE-C1-133.

KE-C1-425 Patrick J. Gilbert KE-C1-419 Marianne Browne	promote the Wild Atlantic Way. Further states that promotion of tourism assets needs to apply to the whole county.	
KE-C1-307 Vincent Crean	The submission seeks the exclusion of land from the visually sensitive area map Buncurrig Cross, Ballyheigue.	A detailed landscape review of the County was undertaken as part of the CDP preparation process to identify countywide landscapes and views that should be protected from inappropriate development. Development is not precluded in these areas however particular care is needed to ensure that development in these areas does not damage the landscape. It is not considered reasonable to identify and remove articular areas from these designations based on land ownership. The subject lands are elevated and in conjunction with adjacent lands form an attractive and scenic landscape. "The subject lands are at a coastal location, adjacent to a protected view and offer an unspoilt, attractive vista to the west."
KE-C1-304 MWP	The submission seeks inclusion of an additional objective stating [KCDP 11-74-A] "Support redevelopment of derelict buildings within views designated in this plan".	Section 4.3 Active Land Management contains a range of policies and objectives to facilitate and support the redevelopment of derelict sites.
KE-C1-203 Todhchaí na Tuaithe	The submission states that a common reason for refusal of planning permission relates to Views and Prospects and states that this must change.	There is no evidence to support this statement. The number of planning applications made in the vicinity of views & prospects in the county would only make up a very small percentage of overall applications. Every application is assessed on a case-by-case basis so reasons for refusal attached to any planning application are unrelated to each other.
Recommendations		
Amend the Views & Prospects in Waterville are per map included in the Appendix.		

Chapter 12 – Energy

Chapter 12 – Energy - Introduction, Gas Network and Transmission Grid and Energy Conservation		
	Submission Summaries	CE Response and Recommendations
KE-C1-363 NEWKD	<p>This submission seeks the inclusion of additional wording to Objectives KCDP 12-14, KCDP 12-21, KCDP 12-22 and KCDP 12-28.</p> <p>KCDP 12-14 Facilitate the sustainable development of wind energy development within open-to-consideration areas at appropriate locations where it can be demonstrated to the satisfaction of the planning authority that there will be no significant adverse impact on residential amenity, on the built and natural environment, or on the visual character</p>	<p>KCDP 12-14. The suggested amendment refers to an appropriate waste management plan when equipment on the windfarm is decommissioned. It is not considered necessary to amend the objective as a plan for the decommissioning of wind energy developments is included for in the Development Management Standards contained in Volume 6.</p>

	<p>of the landscape, <u>and that there is appropriate waste management plan for when equipment is decommissioned, etc.</u></p> <p>KCDP 12-21 Facilitate, <u>encourage and support USSPV as appropriate in new buildings and retrofitting of existing buildings (e.g. agricultural, commercial, industrial, public schools, etc.),</u> where it can be demonstrated to the satisfaction of the planning authority that there will be no significant adverse impact on the built and natural environment, the visual character of the landscape, or on residential amenity, <u>and in certain situations examine the appropriateness of making it a condition of planning.</u></p> <p>KCDP 12-22 Prevent the loss of agriculturally productive land – <u>at term that must be clearly defined and agreed with the relevant stakeholders (i.e. farming bodies)</u> to Utility Scale Solar Photo-voltaic USSPV development.</p> <p>KCDP 12-28 Promote and facilitate the installation of district heating schemes, and <u>the further expansion of the facility in Tralee,</u> that are powered by renewable fuel sources that are produced in a sustainable manner, <u>especially locally-sourced material – including biomass.</u></p>	<p>KCDP 12-21. This objective is focused on Utility Scale Solar Photo-Voltaic Schemes with the suggested amendments focused on buildings. It would therefore not be appropriate to amend this objective as suggested. Objective KCDP 12-10 would support the retrofitting of existing buildings, or the incorporation of renewable energy technology into new buildings.</p> <p>KCDP 12-22. Details regarding what is required in terms of supporting application for a solar energy development are included in the text preceding the objective. No change to the wording of the objective is therefore required.</p> <p>KCDP 12-28. This is a general objective for district heating and would allow for the extension of the existing scheme in Tralee without an amendment.</p>
<p>KE-C1-134 John Fox</p>	<p>The submission states that it is of critical importance that the Local Authority ensures an adequate, reliable and sustainable supply of energy, for the diverse Industrial needs of Kerry, which comes from a mix of sources. The submission states support for the New Fortress Energy and Shannon LNG in providing energy and jobs. Further states that Shannon LNG has an option and a route for a 76 centimetre diameter pipe that could deliver and take gas to/from the National Gas Grid, with a facility to have a 'spur' connection to Listowel, which could supply all the Gas needs of North Kerry. This should be pursued in the interest of Business, Domestic customers and the Environment. It states that the Plan should actively promote the Tarbert Transmission Network system at Kilpaddocke, to encourage Industries/Employers to establish in the Area.</p>	<p>The location of a substation at Kilpaddocke is strategically located in terms of facilitating development of the Landbank.</p> <p>Chapter 12 of the county development plan provides a variety of supports in the form of objectives for the improvement of our energy infrastructure throughout the county.</p> <p>Paragraph 12.2 Gas Network provides specific support for the strengthening of the gas network in Listowel as referenced in the submission, as well as support for the expansion of the gas network at Tarbert/Ballylongford landbank under objective KCDP 12-3.</p> <p>See also response to Submission KE-C1-388.</p>
<p>KE-C1-373 Friends of the Earth</p>	<p>The submission states that the Council must delete in its entirety the proposed objective in Chapter 12 to "Facilitate the expansion of the gas network, including the facilitation of a gas importation facility in the Tarbert/Ballylongford Landbank, and the expansion of the network to the Kerry Hub and Knowledge Triangle settlements of Tralee, Killarney and Killorglin", as this is not in line with government policy.</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 Region relates to New Energy Infrastructure, this objective seeks to support the sustainable reinforcement and provision of new energy</p>

		<p>infrastructure by 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>See also response to submission KE-C1-388</p>
<p>KE-C1-214 Not Here Not Anywhere</p>	<p>The submission recommends that:</p> <ul style="list-style-type: none"> - A national cap on the level of data centre demand that can be accommodated by the grid to 2030, while meeting our renewable energy and climate emissions targets consistent with our obligations under the Paris Agreement, must be set out in national policy. - New data centres must be powered entirely by onsite or new off site renewable energy. It may not be permitted for data centres to be powered through fossil fuels and simply “offset” their fossil energy use through Purchase Power Agreements (see below). - Existing centres should be required to transition rapidly to onsite or new off site renewables. - Wherever technically possible, heat generated from a data centre should be required to be utilised for district heating systems. 	<p>Objective in the Draft Plan, KCDP 12-5 states, consider the sustainable development of Data Centres at appropriate locations powered by renewable energy where it can be demonstrated that there will be no significant adverse impact on the built and natural environment, visual character of the landscape or on residential amenities. Seek opportunities to recover waste heat to support potential decarbonisation projects such as district heating schemes, This objectives contains reference to data centres being powered by renewable energy and seeks opportunities to recover waste heat.</p>
<p>KE-C1-217 Future generations kerry</p>	<p>The submission outlines a contradiction of the plan between the commitment to climate action in Chapter 2 [Objective KCDP 12-10] and the energy strategy which aspires for the expansion of gas, the importation of gas produced by fracking [Objective KCDP 12-10], and the facilitation of data center expansion [Objective KCDP 12-5] based on this gas expansion. The submission seeks that the contradiction outlined are taken on board and the plan is rectified accordingly.</p>	<p>See response to Submission KE-C1-388.</p> <p>Objective 12-12- relates to energy conservation, efficiency and renewable energy. It makes no reference to fracked gas .As per Objective KCDP 12-5, data centres powered by renewable energy will be considered. No reference is made to the powering of data centres by gas.</p>
<p>KE-C1-386 Circular Bioeconomy Cluster South-West</p>	<p>Through discussions with members of the Circular Bioeconomy Cluster South West (CBCSW), it has been identified that the locational criteria will stymie the potential for bioenergy plants in rural areas. The following change is recommended to Policy Objective KCDP 12.26:</p> <p>It was considered by cluster members that limiting developments to small scale was unnecessary and the impacts on traffic, residential and visual amenity were a more appropriate measure for the suitable size of such a development. We suggest removal of word small-scale. Members considered that it may not be viable to locate a bioenergy plant in a rural location if they are limited to a small scale. Existing anaerobic digestion facilities in Ireland's rural areas can range in size from approximately 25,000 tonnes to 100,000 tonnes of feedstock per annum. These facilities can have a symbiotic relationship with rural areas, taking feedstock including agricultural waste from rural</p>	<p>In order for Kerry to contribute to national renewable energy targets, bioenergy will have to form part of this contribution. There is therefore merit in this submission.</p> <p>Recommendation:</p> <p>It is therefore recommended that Objective KCDP 12-26 be amended as follows; Consider in rural areas proposals for suitably small scaled developments for bioenergy plants including anaerobic digestors, close to the source material and where roads have capacity to absorb increased traffic flows. Such plants should, where possible, be located in proximity to existing agricultural buildings. Bioenergy installations shall not be permitted in areas where such developments may affect residential or visual amenity.</p>

	areas and converting it to agricultural products such as organic soil improvers, creating a circular economy.	
KE-C1-111 Mol Teic (t/a Dingle Hub)	The submission states that: 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, while also providing biofuels to replace fossil fuels, digestate that can be utilised as a fertiliser and increased revenue streams for farmers. Based upon the Feasibility Study on the provision of an Anaerobic Digester for the Dingle Peninsula[1] (in which the viability of the plant is demonstrated), broad support should be included in the Development Plan (subject to the normal planning approval process for a specific location).	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. See response to Submission KE-C1-386 for recommended updates to this section. These updates would continue to support anaerobic digestion in the county.
Recommendations		
Amend KCDP 12-26 as follows; Consider in rural areas proposals for suitably small scaled developments for bioenergy plants including anaerobic digestors, close to the source material and where roads have capacity to absorb increased traffic flows. Such plants should, where possible, be located in proximity to existing agricultural buildings. Bioenergy installations shall not be permitted in areas where such developments may affect residential or visual amenity.		

Chapter 12 – Energy - Gas Network – Tarbert/Ballylongford Landbank		
	Submission Summaries	CE Response and Recommendations
KE-C1-388 Safety Before LNG	The submission outlines concern that the Plan is incompatible with national and regional planning strategies regarding its support for the proposed Shannon LNG fracked gas import terminal at Tarbert-Ballylongford Landbank. The submission states that if not amended these concerns will be raised with the Office of the Planning Regulator. The submission opposes Objective KCDP 12-3 which relates to the facilitation of gas network expansion.	The Strategic Development Location (SDL) at Tarbert/Ballylongford in North Kerry is recognised for its potential as an Energy Hub and for industrial development at a regional and national level. It is the policy of the council to support the sustainable development of the Shannon Estuary, in line with the SIFP and the recommendations of its environmental assessment and recognise its potential as an Energy Hub. The Strategic Integrated Framework Plan (SIFP) for the sustainable development of the Shannon Estuary also identifies land for a variety of land and marine based development. Kerry County Council recognises the Shannon Estuary as a major shipping artery and further recognises the ongoing potential of the Tarbert Ballylongford landbank to be sustainably developed for Industry. Kerry County Council when considering the designation of these lands and associated policies and objectives had regard to strategic economic development, energy use, climate action and the proper planning and sustainable development of the area.

	<p>The submission further sets out the following - On May 18th, 2021, the Irish Government published a policy statement on the importation of fracked gas. The policy statement declared that “In order to implement the Programme for Government commitment that it does not support the importation of fracked gas, the Government has approved that: pending the outcome of the review of the security of energy supply of Ireland’s electricity and natural gas systems, it would not be appropriate for the development of any LNG terminals in Ireland to be permitted or proceeded with. The submission requests that the Plan take cognisance of this official government policy.</p>	<p>Objective KCDP 12-3 states that the Council will facilitate the expansion of the gas network including the facilitation of a gas importation facility at this location, as Natural Gas is seen as being a bridge to enable the changeover from fossil fuels to renewables.</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.</p> <p>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 report 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. 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 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>KE-C1-214 Not Here Not Anywhere</p>	<p>The submissions state opposition to Objective KCDP 12-3 as it relates to the LNG in Tarbert which will come from fracked gas and given that fossil gas needs to be phased out in order to avoid catastrophic climate change. The submission states that the plan should: ensure a rapid phasing out of all fossil fuels including gas, not allow the expansion of the gas grid, ban fracked gas in its energy mix and that any new large scale fossil fuel infrastructure projects must be mandated to undertake climate impact assessment to ensure they are consistent with Ireland's fair share net cumulative carbon dioxide (CO2) quota in line with the Paris agreement.</p>	<p>See response to Submission KE-C1-388.</p>
<p>KE-C1-447 Shannon LNG</p>	<p>This submission requests that KCC refer to the need for additional infrastructure, including additional natural gas infrastructure, to address the intermittency problem in wind generation and thereby contribute to the security of energy supply in Ireland.</p> <p>It also welcomes the strong policy contained in the draft, specifically Section 9.6.1.1 and objective KCDP 9-24 (Tarbert / Ballylongford Landbank) , section 9.7.2, (MTU, Fin-Tec, Smart-Agri, Kerry Hub and Knowledge Triangle), objective 9-35, Energy policies - Objective KCDP 12-3, 12-7.</p> <p>The submission also requests strengthening of section 2.6.2.2 Energy Policy and Planning regarding the NSO 8, NDP 2018-2027, National Energy and Climate Plan (NECP) 2021-2030, Climate Action Plan 2021, All-Ireland Generation Statement 2020-2029, Policy Statement on Security of Electricity Supply.</p>	<p>It is the policy of the Council to support the infrastructural renewal and sustainable development of the gas network throughout the county. Objective KCDP 12-3 seeks to Facilitate the expansion of the gas network, including the facilitation of a gas importation facility in the Tarbert/Ballylongford Landbank, and the expansion of the network to the Kerry Hub and Knowledge Triangle settlements of Tralee, Killarney and Killorglin.</p> <p>The Council acknowledge that the provision of enhanced energy security especially during the current energy crisis is essential. In this context there is a need for additional infrastructure across all energy sources/providers (including natural gas infrastructure) at appropriate locations. The provision of such infrastructure is needed to address the problem of intermittency in wind energy generation, and to enable a transition to renewable energy.</p>
<p>KE-C1-478 Friends of the Irish Environment</p>	<p>Friends of the Irish Environment have a long-standing opposition to the construction of a terminal for Liquefied Natural Gas [LNG] on the Shannon Estuary.</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, including the Tarbert/Ballylongford Landbank. It is an objective of the plan to facilitate the expansion of the gas network, including the facilitation of a gas importation facility in the Tarbert/Ballylongford Landbank.</p>
<p>KE-C1-134 John Fox</p>	<p>The submission states that a long-term strategic approach to the potential of the Shannon Estuary including the Tarbert landbank must be taken and its proven deep waters and sheltered bays provide the ideal location for Marine Type Industry, i.e., Imports, Exports, Trans-shipping and of course Manufacture. It states that the Local Authority must liaise with the Local Authorities and State Agencies to ensure the co-ordinated and proper development of the Estuary.</p> <p>The submission suggests that:</p> <ul style="list-style-type: none"> • KCC co-ordinate a 'Shannon Estuary Development Plan' with Limerick and Clare Co. Co.'s so that an agreed oversight structure can be put in place. • KCC meets with the Shannon Foynes Port Company to review their "Strategic Integrated Framework Plan 2041" and marry it to KCC needs. 	<p>Land known as the Tarbert/Ballylongford Land Bank comprises 390 hectares of land zoned for development as set out in the current County Development Plan. The Strategic Integrated Framework Plan (SIFP) for the sustainable development of the Shannon Estuary also identifies land for a variety of land and marine based development. Kerry County Council recognises the Shannon Estuary as a major shipping artery and further recognises the ongoing potential of the Tarbert Ballylongford landbank to be sustainably developed for Industry.</p> <p>The Council is committed to engage with all relevant stakeholders from the wider North Kerry/Shannon estuary area ensure the co-ordinated and proper development of the entire estuary area.</p>

	<ul style="list-style-type: none"> • "The Landbank" be set aside for Marine Type Industry, i.e., Imports, Exports and related activities • KCC formulate a strategy/vision and a time scale for the above items to happen and submit such a plan to the Government for the necessary support to be put in place. 	
KE-C1-388 Safety Before LNG	<p>The submission highlights Section 9.6.1.1 which states that "It is the policy of the council to support sustainable the development of the Shannon Estuary, in line with the SIFP and the recommendations of its environmental assessment and recognise its potential as an Energy Hub". In this regard the submission opposes Objective KCDP 9-22 which supports and promotes the delivery of the Strategic Development Locations (SDLs). The submission outlines several grounds for this including that the SIFP is outdated (2013-2020), was based on a time when the LNG had planning permission and Shannon Development no longer own the landbank. No consideration has been given of zoning industrial lands closer to Tarbert.</p> <p>The submission further states that the Programme for Government committed to supporting the Shannon Estuary and surrounding area through the establishment of a Taskforce to evaluate the potential of the area and how this potential can be realised. The Plan should, therefore, specifically support the workings and outcomes of the Shannon Estuary Economic Taskforce and give it priority over the outdated SIFP where there is a conflict of recommendations.</p>	<p>Refer to Response to Submission KE-C1-346, KE-C1-388 and KE-C1-478.</p> <p>The area of the landbank has been extended in the draft plan to include Tarbert Island.</p> <p>The Council is committed to engage with all relevant stakeholders from the wider North Kerry/Shannon estuary area ensure the co-ordinated and proper development of the entire estuary area.</p>
KE-C1-388 Safety Before LNG	<p>The submission states that the unconditional support for gas importation on the Tarbert-Ballylongford landbank runs counter to the Project Ireland 2040 National Marine Planning Framework which states as National Transmission Policy 6: "Subject to required assessments for the protection of the environment, and only where in keeping with the outcome of the review of the security of energy supply of Ireland's electricity and natural gas systems (which is being carried out by Department of the Environment, Climate and Communications), and not involving the importation of fracked gas, additional proposals for natural gas transmission/ import infrastructure should be supported."</p>	See response to Submission KE-C1-388.
KE-C1-362 Danny Healy- Rae KE-C1-385 Cllr Jackie Healy- Rae KE-C1-513 Mikey Sheehy	This submission states support for the Shannon LNG terminal in Ballylongford/Tarbert.	See response to Submission KE-C1-388.
KE-C1-147 Tarbert	The Tarbert/Ballylongford land bank consists of 390 hectares zoned for marine-related industry, compatible or complimentary industries and enterprises which require deep water access. This region has planning permission for a combined heat and power plant.	See response to Submission KE-C1-388.

Development Association	Developments in this site has the potential to sustainably create substantial employment both in construction and operation phases.	
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional Objective in Section 12.2 which would state “Not support any gas infrastructure that is in any way tied to fracking, such as Shannon LNG”, as it is current government policy that LNG infrastructure should not be progressed until an energy review has taken place.	See response to KE-C1-388 The suggested amendment is not considered appropriate as it may impact negatively on the development of the Landbank, would result in a contradiction with other objectives, namely KCDP 12-3.
KE-C1-316 Gluaiseacht	The submission strongly opposes Objective KCDP 12-3 as this is supporting the importation of fracked gas from the US and runs totally counter to any positive action that the Plan proposes to take on Climate Action.	See response to Submission KE-C1-388.
KE-C1-316 Gluaiseacht	The submission further highlights an issue with Objective KCDP 12-5 as there is no way to currently power Data Centres without a significant adverse impact on the natural environment. The submission sets out that Ireland has more than it's fair share of Data Centres currently and so adding more for the foreseeable future is really adding more fossil fuel power plants to the country.	The objective as worded takes careful consideration of the energy sources of any potential data centres, and it ensures that any such development would not have negative impacts on the county.
KE-C1-387 Art Ó Laoghaire	The submission states that the Plan should focus on renewable energy and building gas infrastructure at Tarbert would be counterproductive, adding to methane emissions locally and nationally, and rapid changes in emissions like methane can result in “rapid climate effects”.	See response to Submission KE-C1-388.
Recommendations		
No proposed amendments		

	Chapter 12 – Energy - Renewable Energy – Wind Energy, Bioenergy & District Heating, Battery Storage for Renewable Energy, Community Consultation, Community Benefit & Microgeneration/Community Projects	
	Submission Summaries	CE Response and Recommendations
KE-C1-240 Eddie Keane	The submission seeks amendments to wording and Objectives KCDP 12-12, KCDP 12-15, KCDP 12-16 and KCDP 12-17. It is stated in their current form they could be viewed as being vague and inconsistent.	The suggested amendment in this submission to KCDP 12-12 would shift the focus from overall renewable energy development to micro-generation. Micro generation is supported by KCDP 12-35. In relation to the parts of this submission that refer to repowering, see response to the DoHLGH Submission.
KE-C1-322 Steve Edwards	The submission applauds the Plan for highlighting the significant contribution the County makes to renewable wind energy and therefore should not have to provide any more. The submission agrees with the government’s intention of net zero emissions by 2050, and how this is to be achieved, as set out under Section 12.5.1.	The content of this submission is acknowledged.

<p>KE-C1-224 Stacks Mountain Windfarm Ltd.</p>	<p>The submission relates to a recently permitted wind farm by An Bord Pleanala located at Ballyhorgan. The submission highlights that the Plan no longer designates the site as 'Open to Consideration'. The submission acknowledges that the Draft Plan was published in advance of the recent decision of the Board in relation to the Ballyhorgan Wind Farm (ABP-301852-18, Ref 14/13). The submission further states that as this is now a consented wind farm site, at a minimum the site should be acknowledged as being "suitable for re-powering". The submission seeks the following:</p> <ul style="list-style-type: none"> - An alteration to Map 6.1 of the of Appendix 6 of the Draft plan's Wind Zoning Methodology (which notes the location of all consented wind farms); - An alteration of the table in section 12.5.3.1 of the draft plan by increasing the number of permitted wind turbines to 381 (increase of 7 from the currently stated 374); - An alteration to map 12.2 of the Draft Plan to shown the permitted Ballyhorgan wind farm development as one of the "Existing & Permitted Wind Energy Developments" within the County; and - An alteration to Map 12.4 of the Draft Plan to include the extent of the permitted Ballyhorgan wind farm as a "Repowering Area". 	<p>This development has only recently received a 10-year planning permission, and a 10-year planning permission so therefore may not be constructed during the lifetime of this plan. It is therefore considered that a repowering application will not be necessary for this site over the lifetime of the development plan, therefore no change is recommended to Map 12.4.</p> <p>Reference to the contribution of this application to RE generation in the county is included in the response to the OPR is Submission.</p> <p>The Wind Zoning Methodology is correct as per dates referenced in the document.</p>
<p>KE-C1-174 BayWa r.e. Ireland</p>	<p>The submission states that the Plan does not allow for an expansion of onshore wind within the county of Kerry and there does not appear to be any 'Preferred' areas zoned as suitable for new onshore wind farm locations, just a small area 'Open to Consideration'. It further states that the area proposed to be 'Open to Consideration' for onshore wind has been drastically reduced, from circa 80,000 Ha to 6,000 Ha and removed the Iveragh, Dingle and Beara Peninsulas for consideration in relation to wind energy production. The submission encourages Kerry County Council to re-evaluate the proposed wind farm zoning areas within the Kerry County Development Plan 2022-2028 to enable an expansion of the renewable energy assets connecting to the Irish grid and allowing Irelands climate goals to be met, at both a county level and a national level.</p>	<p>See response to OPR Submission.</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.</p>
<p>KE-C1-46 Cllr. Charlie Farrelly</p> <p>KE-C1-385 Cllr Jackie Healy-Rae</p>	<p>The submission states that wind farms that are less than 8 years old should not be zoned for repowering. The submission also seeks further clarity on repowering, is it a national directive that wind areas need to be repowered?</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 being given to be 30 years in some cases. 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>KE-C1-147 Tarbert Development Association</p>	<p>The submission makes the following observations and recommendations.</p> <p>Kerry must be nearing saturation point with the proliferation of windmills.</p>	<p>The number of wind turbines that have been built/permitted is detailed in the plan. The number of permitted turbines was taken into consideration as part of the Wind Zoning Methodology which forms part of Volume 1 Appendices including their cumulative impact this has informed the</p>

	<ul style="list-style-type: none"> We do need to reduce our carbon footprint, but this will take some time and money. New build must be A rating energy efficient. Older home must be properly financially supported to improve their BER rating. Current grants are totally inadequate. As our consumption of fossil fuels reduce our reliance on electricity will increase. Renewables cannot and will not be able to provide the energy needs of the county/country for the next 30 years at least so we do need to bridge that gap with the least offensive fossil fuel which is gas. An application for planning permission for a gas importation terminal is pending and subject to proper planning and sustainable development we hope this is successful and will provide well needed jobs. A potential North Kerry/West Limerick/Clare network has been identified in the Regional Spatial and Economic Strategy as having a big part to play in the future development of the Shannon Estuary and Foynes Port. The infrastructural development that would be required for the gas terminal would support this strategy. 	<p>designator of wind energy areas in chapter 12 and the associated policies and objectives.</p> <p>Energy conservation measures are supported by the plan with many domestic forms of RE, e.g. solar panels on homes, subject to exemptions as part of the Planning & Development Regulations.</p> <p>See response to KE-C1-388 in relation to the landbank, gas and the proposed LNG development.</p>
KE-C1-49 Marie Moloney	Solar energy should be the way forward for renewable energy and the proposed areas of Scartaglen including Townlands Knockeenahone, Knockrower East, Knockrower West as far as Annablaha in Kilcummin, Gneeveguilla, Cordal and the Townlands of Currow including Knockacorrin, Kilsarcon & Killeentierna be removed from the Draft Development Plan as Areas of "Open consideration for Wind Farm Development.	See response to Submission KE-C1-31 and the OPR submission.
KE-C1-298 Johnny Healy-Rae	Windfarm developments should only be in suitable areas and certainly not in Scartaglin, Gneeveguilla, Kilcummin, Headford and Killarney.	<p>See response to Submission KE-C1-31 and the OPR Submission.</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.</p>
KE-C1-46 Cllr. Charlie Farrelly	<p>Areas in Scartaglen including Townlands Knockeenahone, Knockrower East, Knockrower West and stretching up to Annablaha, Gneeveguilla, Cordal and the Townlands of Currow including Knockacorrin, Kilsarcon & Killeentierna be excluded as area's for further assessment/consideration for new Wind Turbines and should be substituted for Townlands in the Kilgarvan Area.</p> <p>Strongly opposed to the repowering of Barna Windfarm and also the repowering of other current Windfarms in East Kerry.</p>	<p>See response to Submission KE-C1-31 and the OPR Submission.</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. The suggested townlands in the Killgarvan area were assessed as part of this process and deemed to be unsuitable for wind energy development.</p>

		Repowering applications will be assessed as per Section 12.5.4.1.7 of the Draft Development Plan. Repowering is referred to in the Draft Revised Wind Energy Development Guidelines 2019.
KE-C1-64 Cllr. Donal Grady KE-C1-190 John O'Grady KE-C1-134 John Fox KE-C1-136 Michael O Hanlon KE-C1-195 Caroline Hurley	The submission acknowledges the large contribution that Kerry has made to wind energy production and states this should be maintained and expanded through information events about new development and to encourage public participation.	Submission is noted Public participation is an important element of the planning process, be it at plan making or application stage. Increased public participation is encouraged in the Draft development plan.
KE-C1-107 John O'Sullivan	The submission outlines the following: - The CDP fails to explain that the area zoned for "repowering" means that the current wind farms are zoned as suitable for renewal when their current 25 year life span ends and open to be replaced with taller turbines. - The Board of an Bord Pleanala quotes KCC's planning zoning which identifies areas as suitable for wind farms as reasons for permitting applications for planning [the submission includes 5 ABP decisions]. - If KCC received a direction from a government Department to include a "repowering zone" in the CDP then this should be disclosed. - Reasoning for zoning part of the county in this CDP for wind farms is very weak, the main reason appears to be because a power line goes through the zoned area. - The CDP states Kerry can produce 18% of all wind electricity in the country with an overconcentration in North Kerry. - There is no map showing the locations of individual wind turbines in the county. - there is no limit on the number of wind turbines to be permitted in the county, the Renewable Energy Strategy 2012 states "it is plan led rather than target driven." - Eirgrid report 2020 shows that 12% of all wind energy in the South West was "curtailed." This means that wind farms were forcibly switched off by Eirgrid due to over generation of wind electricity at the time. This shows that excess wind generated electricity can be generated compared to electricity demand and in excess of the amount that can be exported. Eirgrid fail to disclose the cost of curtailment as the wind farm owner is compensated for having to switch off.	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 being given to be 30 years in some cases. 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. 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. Maps showing the location of turbines are included in both the Wind Zoning Methodology and the Landscape Review, both found in the Volume 1 Appendices.
KE-C1-110 JOAM Consulting Ltd	This submission requests that the area outlined on the attached map should have been included in the Energy Zoning Regions as an area "Open to Consideration". Zoning Proposal 1. That the region shown on Figure 3, Dromid Area, be included in the zoning "Open to Consideration" for wind farm development in the Kerry County Development Plan 2022-2028.	This area was subject to assessment as per the Wind Zoning Methodology contained in Volume 1 Appendices and was deemed not to be suitable for wind energy development. No changes are therefore proposed for the wind zoning map. The existing Knockaneden Wind Farm is included as a repowering area.
KE-C1-113 FuturEnergy Ireland	This submission requests that: Section 12.5.2 of the Draft Plan is updated to account for the most recent policy context and the 80% renewable electricity target.	See response to OPR submission. The Wind Zoning Methodology has been updated following a recommendation in the OPR submission.

	<p>In short, the Draft Plan has provided such a limited quantum of ‘open to consideration’ land area and no ‘preferred’ areas that, after setback distances to Eircodes are applied, there is no place in the County for new commercial wind farms.</p> <p>We believe in totality that the Draft Plan:</p> <ul style="list-style-type: none"> • Contravenes Special Planning Policy Requirement (SPPR) No. 2 of the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (Dept. of Housing, Planning, Community and Local Government) July 2017; • Fails to implement national policy and targets in the Climate Action Plan 2021; • Fails to provide any land in an ‘acceptable in principle’ category to deliver sufficient wind energy quantum based on the principles of proper planning and sustainable development. • Fails to provide an adequate land area in the ‘open to consideration’ category to deliver a sufficient wind energy quantum based on the principles of proper planning and sustainable development; • Conflicts with the Draft Plan’s own proposed policy, KCDP 12-12. <p>We wish to highlight a site that FuturEnergy Ireland is proposing to develop, along with a leading Irish energy developer, at Cummeenabuddoge, near Ballyvourney in south-east Kerry, on the boundary of Co. Cork. Pre-application discussions have commenced with An Bord Pleanála and Kerry County Council.</p> <p>Due to the existing and on-going commercial forest activity at Cummeenabuddoge the underlying peat is drained and modified and is unlikely to be sequestering Carbon. The Council’s logic to eliminating peat lands from wind farm development to protect carbon sinks is thus flawed in relation to existing commercial forests on peat lands. We strongly contend that this constraint needs to be removed from the Wind Zoning Methodology at this location.</p>	<p>The area referred to in the submission, and the county as a whole, was subject to assessment as per the (updated) Wind Zoning Methodology contained in Volume 1 Appendices and the area referred to in the submission was deemed not to be suitable for wind energy development.</p> <p>It should also be noted that the Visual Sensitivity Map included in the Landscape Review (Volume 1 Appendices) identifies this area as a Visually Sensitive Area in the Draft Plan. A number of issues are therefore of relevance to this site.</p> <p>No changes are therefore proposed for the wind zoning map.</p>
<p>KE-C1-392 Wind Energy Ireland</p>	<p>WEI acknowledge that Kerry has made a considerable contribution to the rollout of Ireland’s renewable energy capacity however, there is a serious need to increase these efforts in order to reach CAP 2021 targets. WEI welcomes the draft Plan’s commitment to promote the growth in the county’s renewable energy generation through solar, offshore wind and other green technologies but is deeply concerned about the limited scope for future development of onshore wind.</p> <p>Key Considerations and Observations</p> <p>2.1 Draft Plan Lacking in Designated areas for development of Onshore Wind Farms</p> <p>2.1.1 Chapter 12 Energy – Renewable Energy</p> <p>WEI welcomes objectives KCDP 12-1 and KCDP 12-12 but states that the draft plan goes against KCDP 12-13.</p> <p>WEI recommend that Kerry County Council:</p> <ul style="list-style-type: none"> • re-examine the methodology that they used to designate the Zoning of land available for wind energy development. 	<p>See response to the OPR submission.</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 on energy in the submission from the OPR.</p> <p>Kerry County Council is supportive of the concept of a regional strategy for renewable energy, with reference to same in Section 12.5.2.1.</p>

	<ul style="list-style-type: none"> • Consider identification and incorporation of areas where wind development is designated as ‘Acceptable in Principle’. • Consult the methodology that has been applied in other local authorities that could ensure a more consistent approach in interpreting national guidelines. <p>2.2 Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change</p> <p>WEI Recommendation: Kerry County Council examine the approach taken in Section 12.5.3.1 and aim to make amendments to align with SPPR 2 in ‘Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change’.</p> <p>2.3 Impact of Setback distance</p> <p>WEI Recommendation: Revisit and adjust the Wind Zoning methodology used to identify potential areas for wind development as part of the draft Plan, taking account of the impact setback distances have on the availability of land for wind development.</p> <p>2.4 A Regional Approach</p> <p>WEI acknowledges that Kerry County Council is only responsible for its own functional area however, WEI would like to highlight the importance that the county fit into a regional and national planning policy context that may be in place in the future. The regional approach would undoubtedly provide a more appropriate platform for ensuring national policy can be transposed effectively to local level, and ensure a consistent approach is used across the entire country that reflects Government policy.</p> <p>WEI will continue to advocate for the preparation of Regional Renewable Energy Strategies to be accelerated and prioritised by the three Regional Assemblies.</p>	
<p>KE-C1-384 SSE plc</p>	<p>This submission makes the following recommendations:</p> <p>1. Energy Conservation & Efficiency - References Objectives KCDP 12-11 and KCDP 14-4 SSE Recommendation:</p> <ul style="list-style-type: none"> • Spatial planning at a local authority level is critical in driving the electrification of transport. Kerry’s CDP should go further than the policies currently outlined to identify areas where electric vehicle charge points could be installed and competitively tender for these assets. <p>2. Security of Supply and Renewable Energy Transition - References Objectives KCDP 12-2, KCDP 12-4 and KCDP 12-12 SSE Recommendation:</p> <ul style="list-style-type: none"> • Recognise the ongoing importance of security of supply in the CDP and the continued need for flexible generation capacity on the Irish grid. • Recognise the importance of ensuring the continued use, reuse or repowering of existing infrastructure where appropriate to enable Ireland to meet its energy needs. • Identify and support opportunities for CCS and hydrogen infrastructure to decarbonise conventional generation, industry and transport. 	<p>The Development Plan provides the framework that will support the provision of infrastructure associated with electric vehicles. In addition, there a number of exemptions under the planning and development regulations the facilitate e-charging points and associated infrastructure. It would be outside of the scope of this plan to identify specific areas where charging points could be located.</p> <p>See response to the OPR submission and response to Submission KE-C1-113.</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.</p> <p>In relation to repowering, see response to the DoHLGH submission.</p>

<p>3. Onshore Wind Development - References Objectives KCDP 12-13 and KCDP 12-14 SSE has four specific concerns over the wind zoning set out in the draft CDP, they are:</p> <p>3.1 Demarcation of 'Repowering Areas' - References Objectives KCDP 12-16 and KCDP 12-17 SSE Recommendations:</p> <ul style="list-style-type: none"> • Adopt a presumption in favour of repowering existing renewable energy sites, and an assumption that a site already used for a wind farm development retains an ongoing suitability for new and repowered wind developments. • Make clear that applications for repowering will be considered on a case-by-case basis by designating all areas with current or planned wind development as 'Acceptable in Principle' for repowering. <p>3.2 Failure to identify additional areas that are 'Acceptable in Principle' SSE Recommendations:</p> <ul style="list-style-type: none"> • Examine how the methodology has been designed and applied to determine how it might be refined to identify additional areas where wind development is 'Acceptable in Principle'. • Consult the methodology as applied in other local authority areas to ensure a more consistent approach to interpreting national guidelines. <p>3.3 Designation of Lough Leane Catchment as Unsuitable for Wind Development SSE Recommendation:</p> <ul style="list-style-type: none"> • Remove the categorisation of 'Unsuitable for Wind Development' from the Cummeenabuddoge Wind Farm site and designate it either as 'Open to Consideration' or 'Acceptable in Principle' for wind development. • Remove the categorisation of 'Unsuitable for Wind Development' from the Lough Leane catchment within the context of the Wind Zoning Methodology to ensure this is not in itself a barrier to wind development in the area. Instead, allow for case-by-case decision-making based on rigorous site-specific assessments of specific sites. • Work with stakeholders such as SSE in assessing the merits of wind development in this part of the county to ensure the most recent evidence is gathered and assessed. <p>3.4 Impact of setback distances on areas 'Open to Consideration' for wind development SSE Recommendation:</p> <ul style="list-style-type: none"> • Revisit and adjust the Wind Zoning methodology used to identify potential areas for wind development as part of the CDP, taking account of the impact setback distances have on the availability of land for wind development. <p>4. Battery Storage for Renewable Energy - References Objective KCDP 12-30 SSE Recommendations:</p>	<p>The Plan is supportive of renewable energy, whilst not having specific hydrogen or CCS related objectives, they could be considered to be supported by the existing objectives. In particular Objective KCDP 2-3 deals specifically with decarbonisation and is supportive of decarbonisation across all sectors.</p> <p>In relation to battery storage, see response to KE-C1-46.</p>
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	<ul style="list-style-type: none"> • Facilitate co-location of renewables developments with other low carbon technologies and supporting infrastructure, with weighting in favour of such developments in-line with standalone renewables developments. • Take note of the extensive risk mitigation strategies employed by battery storage operators when assessing planning applications for their development. 	
<p>KE-C1-321 Energia Renewables</p>	<p>The submission welcomes Kerry County Council’s inclusion of a Renewable Energy Strategy within the Draft Plan. The submission questions the position of the Council moving from the 544 sq. km designated ‘open to consideration’ for wind development in the Renewable Energy Strategy 2012 to the proposed 58 sq km in the current Draft Plan proposals, a reduction by some 89.3%. The proposed policy ‘Extension to Existing Wind Farms’ KCDP 12-18 is welcomed, however the consideration of such areas adjacent to/in proximity to existing and consented wind farms should be expressly included as areas ‘open to consideration’ and weighted accordingly within the Wind Zoning Methodology. The submission notes at Section 12.5.3 reference to the number of wind turbines within the County and wind energy generating capacity and would encourage the County to review how best it can further continue to support renewable energy rather than consider its current contribution as a ceiling. It also raises the potential uncertainty associated with offshore wind in this maritime area. This is in the context of prevailing sea conditions. The submission welcomes the identification of transmission grid requirements and policy provisions to support its development (KCDP 12-6). The submission requests clarity in its presentation of Map 12.1 in particular of substation accuracy re Substation Listowel permission/consent and clarification on labels on substations identified being ‘as built’ or ‘consented’.</p>	<p>See response to OPR submission. The Wind Zoning Methodology has been updated following a recommendation in the OPR submission.</p> <p>Substations shown on Map 12.1 are those located on the 110/220kv network and reflect those shown on the EirGrid Transmission System Map.</p> <p>In order to provide more clarity in relation to extensions to existing wind farms, additional wording is proposed.</p> <p>Proposed Amendment 12.5.4.1.8 Extension to Existing Windfarms In certain circumstances an extension to an existing wind farm may be considered subject to its location in an open to consideration area or repower area, and subject to best practice environmental standards and where existing infrastructure can be used. Extension to existing windfarms will not be considered within Natura 2000 sites.</p> <p>KCDP 12-18 Consider extensions to an existing windfarm in areas zoned open to consideration or repower areas where it can be demonstrated to the satisfaction of the planning authority that there will be no significant adverse impact on residential amenity, the built and natural environment, or on the visual character of the landscape.</p>
<p>KE-C1-223 EDF Renewables Ireland</p>	<p>The submissions primary concern relates to the fact that certain provisions of the Draft Plan artificially and inappropriately restrict the ability of the County to achieve its renewable energy targets. The submission seeks the following:</p> <ul style="list-style-type: none"> -Expansion of OTC areas to include those lessor sensitive areas identified as being in need of further consideration in the Draft Plan (Appendix 6), or - Increased policy flexibility for sites outside the Open to Consideration and Repower Areas, with a separate category “Areas of Potential” so as to justify wind energy development based on their appropriate nature provided it can be clearly demonstrated that the development of a wind farm at such locations will not have adverse impacts on ecology, residential amenity, archaeology , hydrology or the landscape. 	<p>See response to the OPR submission.</p> <p>There are national targets in relation to renewable energy, but no such targets have been identified for individual counties. The draft plan outlines in great detail the significant contribution that the county of Kerry is making to helping Ireland meet its renewable energy targets and will continue to do so with supportive renewable energy policies which are contained in the draft plan.</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,</p>

		landscape and technical criteria. This document has been updated in response to the recommendation in the submission from the OPR.																					
<p>KE-C1-340 Alexander Kelly</p>	<p>The submission states that a significant amount of previously zoned 'Open to Consideration' lands for wind energy development have been de-zoned within the Draft Plan which is not supported. It further states that the methodology employed in ascertaining what lands are to be removed is questioned particularly in relation to Areas 23, 24 and 25 which have been used as working examples to show that they are suitable for future wind energy development. It is submitted that the methodology outlined in Appendix 6 of the Draft CDP is not fit for purpose in designating zoning for wind farm development. The assessment of landscape sensitivity is too heavily reliant on a flawed cumulative impact assessment process and that the inclusion of 'Peat Soils' as a constraint on wind energy development is a disproportionate limitation on the potential for county Kerry to contribute to national renewable energy targets, particularly given the variable condition of different types of peat soils across the county. The submission states that development of wind energy in the inland portions of the Areas 23, 24, and 25 will not significantly impact visual integrity of sensitive coastlines.</p>	<p>Response</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.</p> <p>To date 374 turbines have been constructed (in permitted yet to be constructed) in the county in the following LEA.</p> <table border="1" data-bbox="1317 491 1995 730"> <thead> <tr> <th>LEA</th> <th>No. Turbine</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Castleisland</td> <td>180</td> <td>48%</td> </tr> <tr> <td>Corca Dhuibhne</td> <td>0</td> <td>0%</td> </tr> <tr> <td>Kenmare</td> <td>103</td> <td>27%</td> </tr> <tr> <td>Killarney</td> <td>6</td> <td>2%</td> </tr> <tr> <td>Listowel</td> <td>85</td> <td>23.0%</td> </tr> <tr> <td>Total</td> <td>374</td> <td>100%</td> </tr> </tbody> </table> <p>To have regard to correlations in particular EA's a cumulative impact assessment was warranted.</p> <p>The cumulative assessment based on the ZTV analysis concluded that certain areas had reached their capacity to absorb additional wind turbines and this analysis and its conclusion is considered reasonable.</p>	LEA	No. Turbine	%	Castleisland	180	48%	Corca Dhuibhne	0	0%	Kenmare	103	27%	Killarney	6	2%	Listowel	85	23.0%	Total	374	100%
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<p>KE-C1-372 James Dineen</p>	<p>For the purposes of this submission, the Wind Zoning Methodology (Appendix 6) of the Draft Plan has been examined with regards to the following Areas:</p> <p>16 (located on an elevated area east of Kilgarvan) - This area is considered to have potential for wind energy development.</p> <p>18 (located to the east and south of Scartaglin) - This landscape in the western part of the area would be sensitive to wind energy development with the landscape in the eastern part of the area having potential for wind energy development</p> <p>19 (provides a setting for the MacGillycuddy's Reeks in the western part of the area) - This landscape would be sensitive to wind energy development.</p> <p>This submission calls for a revision to the zoning methodology which would result in larger 'Open to Consideration Areas'.</p>	<p>See response to the OPR submission.</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.</p>																					

	<p>We request that the Planning Authority provide for increased policy flexibility to allow for the assessment of projects located outside currently designated 'Open to Consideration' or 'Repower Areas' to be justified through site specific assessment processes.</p> <p>This submission also outlines concerns regarding:</p> <p>Wind Energy Designations in the Draft Overarching Policy & Targets - Comment re RSES While it is acknowledged that the constraints-layering process has taken place (discussed further below), the resulting wind energy zoning is considered to give rise to significant concern over the emerging Plan's ability to align with the RSES in place and to offer the support for the development of renewable energy sources as is clearly envisaged in the RSES.</p> <p>Zoning Methodology Landscape and Visual Peat and Soils</p> <p>It also notes that the application of strategic high-level and County-wide blanket constraints can lead to certain sites being categorised within a broad category which does not accurately reflect the specific site conditions, which could facilitate the development of a carefully designed wind farm development at a particular location. In order to ensure the emerging planning policy is one which supports renewable energy development, thus aligning with direction at regional and national level, it is imperative that the Draft Plan is revised as called for above, with a revision to the zoning methodology which would result in larger 'Open to Consideration Areas'.</p>	
<p>KE-C1-313 Danny Healy-Rae KE-C1-267 Maura Healy-Rae KE-C1-268 Maura Healy-Rae KE-C1-385 Cllr Jackie Healy-Rae</p>	<p>This submission states that it should be an objective of this county development plan that the proximity of turbines to residential properties should be a minimum of six times the blade height.</p>	<p>SPPR2 of the draft wind energy guidelines specify a min separation distance of 4 times the blade tip height from the curtilage of a residential property subject to a minimum setback distance of 500m. SPPR2 also states that planning authorities shall not apply a setback distance that exceeds their requirements.</p> <p>Planning Authorities <u>MUST</u> comply with a specific Planning policy requirement specified within ministerial guidelines.</p>
<p>KE-C1-313 Danny Healy-Rae KE-C1-271 Maura Healy-Rae</p>	<p>The submission states that the plan should acknowledge Kerry's contribution for the national renewable energy target with Kerry's land mass of 6.8% currently contributes 18-22% of national wind turbine energy.</p>	<p>The contribution that Kerry is making in terms of renewable energy generation is set out in Chapter 12 where its contribution is set out in detail.</p>

<p>KE-C1-312 Dromclough NS</p>	<p>The submission states that North Kerry should be protected from any further windfarms and a clause should be inserted in the plan stipulating that any existing, or windfarms that have been granted planning permission, cannot be extended.</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.</p> <p>Applications for the repowering or extension of wind farms will be assessed against the policies contained in the Draft Development Plan.</p>
<p>KE-C1-167 Linda Edwards</p>	<p>The submission raises concern with the ever increasing numbers and applications for wind farms in Kerry. -The submission also recommends all areas that were zoned for wind farms should now be rezoned. There is also a threat posed by these structures to birds, wildlife, habitats and water courses. -Similarly the submission recommends that Floating windfarms off the coast I think are the way forward. Kerry has a long coastline and investment should be made into exploiting this to produce wave energy</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.</p> <p>The draft plan contains policies and objectives supportive of offshore wind energy in chapter 12 in particular objective 12-29.</p>
<p>KE-C1-433 Lixnaw Wind Aware Group, Luachra wind awarness group, Tullamore action Group, North Kerry Wind Turbine Awareness Group</p>	<p>This submission questions the areas zoned "Repowering" including the Stacks Mountain SPA and An Bord Pleanala's interpretation of the zoned areas and that North Kerry has an over concentration of wind farm developments.</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.</p> <p>See response to the DoHLGH submission for additional commentary on the issue of repowering in the Stack's Mountain SPA.</p>
<p>KE-C1-326 Marie Moloney KE-C1-133 Linda Edwards</p>	<p>This submission states that Kerry County Council refrain from zoning any lands for Wind Energy.</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.</p>
<p>KE-C1-215 Shannon Rangers</p>	<p>This submission requests that prior to adopting a new County Development Plan that Kerry County Council conduct a review of the community gain funds that wind farm owners operate in North Kerry. Shannon Rangers GAA request that only wind farm</p>	<p>Community gain is provided by some wind farms in the county, but they are not obliged by a planning condition to provide same. Objective KCDP 12-33 will ensure that future applications including repowering applications are subject to community gain.</p>

KE-C1-212 Ballylongford GAA Club	operators who have had a community gain fund in place for the operational life of their wind farm will be considered for “repowering” permission.	
KE-C1-381 North Kerry Football Board KE-C1-402 Brendan O Grady KE-C1-420 Mary Behan KE-C1-399 James Fogarty	The submission states opposition to the continued zoning of any part of the county, especially North Kerry, for wind farms or repowering as the county is already making a significant contribution. The submission seeks that all of the zoning is removed from the development plan.	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. It is therefore proposed to maintain the zonings that are included in the draft plan as recommended in response to the OPR Submission.
KE-C1-380 MARTIN MULVIHILL	The submission raises concerns about the scale, location and extent of the areas that are designated as ‘open to consideration’ in North Kerry, particularly East of Moyvane which comprises upland heath and bog, which needs to be protected. It also states that Kerry County Council should promote community-energy projects and more sustainable approaches to energy generation that benefit local economies including supporting the growing of energy crops, investigating the merits of anaerobic digestors in close proximity to GNI pipeline and the placing of solar panels on the roofs of community and farm buildings.	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. Areas of peat are included as a constraint in the Methodology. The Draft Development Plan is supportive of all types of renewable energy, with policies in support of bioenergy found in Section 12.5.4.4. Community energy projects are supported in Section 12.5.5 of the Draft Development Plan.
KE-C1-380 MARTIN MULVIHILL KE-C1-280 Maura Healy- Rae	The submission states that it should be an objective of this plan that zoning for wind turbines is not allowed adjacent or too near to residential properties, schools, community buildings or churches, particularly in the regions of Scartaglin, Gneeveguilla, Headford, Kilcummin and Killarney, however, turbines could be placed in secluded places such as on mountains and hills, away from houses and people.	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. See response to Submissions KE-C1-313, 267, 268 and 385 in relation to issue of setback distances.
KE-C1-385 Cllr Jackie Healy- Rae	The submission states that the buffer zone of 500m should be increased to 2km near any SAC/SPC in order to protect wildlife and habitats.	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.

		The reasons for a buffer around the Hen Harrier SPA are outlined in the Methodology.
KE-C1-218 Aidan Linnane	The submission states that North Kerry has shouldered more than it's fair share of the wind farm projects and that areas previously "open to consideration" should all be closed with no additional wind turbines/wind farms allowed. It further states that full consultation should be carried out with every household for any new areas proposed as "open to consideration" or "strategic areas" explaining the pros and cons of such designation.	<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.</p> <p>Public consultation for wind energy developments is included for in Section 1.15 of the Development Management Standards & Guidelines in Volume 6 of the Draft Plan.</p>
KE-C1-317 Danny Healy-Rae	Wind energy developments should not be situated near residential properties or community facilities and particularly not in the regions of Scartaglin, Gneeveguilla, Headford, Kilcummin and Killarney. However, turbines could be placed in secluded places such as on mountains and hills, away from houses and people.	<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.</p> <p>There are no areas zoned for wind in Gneeveguilla, Headford, Kilcummin and Killarney.</p>
KE-C1-320 Harmony Solar Ireland Limited	<p>The submission seeks to ensure that the Council acknowledges that solar panels are considered water compatible and will not be impacted by a flood event. Their provision in a flood zone should not be precluded. Section 1.15.2 should be revised to state the following:</p> <p>“Adequate drainage, surface water run-off and flooding mitigation such as placement of panels above the flood level. All development proposals within or incorporating areas of moderate or high risk of flooding (Flood zone A & B) shall be accompanied by a site-specific Flood Risk assessment in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (DHELG and OPW, 2009)”.</p> <p>Also seeks inclusion of specific objectives which should state the following “The duration of the permission for solar PV developments (The period in which the development can be completed), should be for a period up to ten years from the date of grant of planning permission.” An objective should be included that “The lifetime for future solar PV developments be granted planning permission for an operational period of between 35-40 years”.</p>	<p>The Planning System and Flood Risk Management Guidelines for Planning Authorities (DHELG and OPW, 2009) classifies the vulnerability to flooding of different types of development as set out under Table 3.1 of those Guidelines. Section 3.5 of those Guidelines sets out clearly the type of development that can or cannot be considered within Flood Zone A, B and C. These are Section 28 Ministerial Guidelines, and the Local Authority is obliged to comply with them. It should be noted the Guidelines do not preclude the consideration of certain types of development such as Solar Panels within Flood Zone B, once a justification test is met.</p> <p>The standard timeframe for planning permission to be completed is 5 years under the Planning and Development Act, 2000, as amended. However, a Planning Authority under Section 41 of the Act may having regard to the nature and extent of the relevant development specify a period of more than 5 years to enable a development to be completed.</p> <p>The Draft Plan does not stipulate that the lifetime of a permitted solar development should be a particular length. Not specifying such a length allows the planning authority flexibility when attaching conditions to the grant of solar developments in line with best practice for these types of</p>

		development, particularly given that no Section 28 Guidelines have been issued in relation to this form of development.
KE-C1-218 Aidan Linnane	The submission requests that no solar farms are permitted in any area until all Southfacing roof spaces have been fully utilised on both public and private buildings.	Kerry County Council and the Draft County Development Plan is supportive of all forms of renewable energy. Home Energy grants are available from the SEAI for the upgrade of homes. The National Retrofitting Scheme has also been recently announced by the Government. It would be outside of the remit of a development plan to require all homes to have solar panels before a solar farm could be considered. There are benefits of providing stand alone solar farms which would be lost if the plan prevented their development
KE-C1-61 North Kerry Biogas Farmers Association	This submission requests that KCC support the further development and promotion of AD and Biogas production in North Kerry and that a specific template for farm-based AD plants in developed.	Section 12.5.4.4 deals with Bioenergy, where it is recognised that Kerry, has a significant bioenergy potential in the form of agricultural land, forestry, agriculture and industrial sources. Objectives 12-25/26 seek to facilitate the sustainable development of bioenergy plants including anaerobic digestors, in compliance with the development management standards at appropriate locations and at an appropriate scale. See response to Submission KE-C1-386.
KE-C1-114 Denis Michael Galvin	This submission states that the West Kerry Dairy Farmers have completed an energy masterplan for the sector and view anaerobic digestion, PV generation on the roofs of farm buildings as well as hydro-electricity as important energy resources to considerably reduce the sectors carbon emissions.	The preparation of such a plan is welcomed. The Draft Development Plan is supportive of all forms of renewable energy in order to ensure maximum generation of renewable energy in the county.
KE-C1-71 MJ Kearney	Kerry is ideally situated to be a Centre of Excellence for developments in the Agri-Food and Waste Biomass Processing industry and Kerry County Council should grow its bioeconomy and welcome planning applications furthering these ambitions.	This submission is supported by Objectives KCDP 12-25 to 12-28.
KE-C1-46 Cllr. Charlie Farrelly KE-C1-189 Marie Moloney KE-C1-218 Aidan Linnane KE-C1-397 North Kerry Environmental Forum /Association KE-C1-107 John O'Sullivan	The submission outlines the following: - There is no map showing the locations of and numbers of the BESS that have got planning permission in the county. - Of the 200 BESS that have been permitted in the county, 199 are in North and East Kerry, probably the highest concentration of BESS in the World. - there is no fire safety/evacuation procedure in Kerry for these fire/explosion prone installations. - It is stated in webinar 13.1.2022 that BESS installations will only be allowed at Eirgrid substations but there are already BESS permitted at wind farms and solar farms. This does not seem to comply with KCC statement.	9 BESS applications have been permitted in the county and all are located at existing grid substations in various locations throughout the county. These can be viewed via the Councils online planning enquiry system. The Council's online planning enquiry system can be used to search for and locate applications that have been applied for in the county. 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. Applications received are subject to rigorous assessment including an assessment by the chief fire officer.

<p>KE-C1-85 Niall Marshall KE-C1-95 mike casey KE-C1-385 Cllr Jackie Healy-Rae KE-C1-433 Lixnaw Wind Aware Group, Luachra wind awarness group, Tullamore action Group, North Kerry Wind Turbine Awareness Group</p>		
<p>KE-C1-397 North Kerry Environmental Forum /Association</p>	<p>The submission acknowledges that developments are subject to a public consultation process but states that comprehensive research is required to enable informed decision making on the issue of fracking and wind energy. The submission further states that more favourable sources of renewable energy are solar energy and battery storage.</p>	<p>The content of this submission is acknowledged. The Development Plan is supportive of all forms of renewable energy in meeting renewable energy targets.</p>
<p>KE-C1-190 John O’Grady</p>	<p>The submission highlights the lack of consultation carried out by wind farm developers with the local community.</p>	<p>As per Section 1.15.1 Wind Energy specifies that prospective windfarm developers, engage in active public consultation with the local community in advance of the making of a planning application.</p>
<p>KE-C1-385 Cllr Jackie Healy-Rae</p>	<p>The submissions states that it should be a requirement for any large scale renewable energy project to distribute an information pack outlining the proposed development to every address within 10KM of the development site.</p>	<p>As per Section 1.15.1 Wind Energy as contained in Volume 6 Development Management Standards, engagement with active public consultation with the local community in advance of and in addition to the statutory public consultation required as part of the planning application process is required for wind energy developments.</p> <p>Specifying a distance of 10km from any proposed development is considered excessive as the potential impacts of a development reduce the further you get from same. With the increasing use in effective online methods of public consultation, engagement with the public is therefore possible to a greater extent.</p>

<p>KE-C1-80 Kerry IFA</p>	<p>-Kerry County Council should facilitate and encourage the micro generation of renewable energy. Exemption of development charges should be increased to 1 megawatt production.</p> <p>-Requests that Kerry County Council take a proactive approach in helping reduce reliance on fossil fuels while supporting renewable energy initiatives.</p>	<p>Micro generation is supported in the Section 12.5.5 of the Development Plan. The plan is also supportive of measures to reduce reliance on fossil fuel, for example in promoting Active Travel.</p> <p>Development charges form part of the Development Contributions Scheme 2017 and are therefore not dealt with in the Development Plan. This area can be looked at when the Scheme is reviewed.</p>
<p>KE-C1-233 SKDP</p>	<p>This submission highlights the opportunities that community energy presents for communities across the county benefiting from developing their own generation projects. The submission states that this an area that needs to be recognised and included in the new County Development Plan. The submission states that the following should be considered: Facilitating the siting of community owned energy generation projects in locations outside of specific designated areas for renewable energy developments. Look at exempting larger roof mounted community owned solar projects. Put in place (following consultation with the community energy sector) guidelines that communities can follow to make the process of securing planning for a proposed project as easy (and cost effective) as possible. Coordinate with other agencies to establish clear requirements/guidelines with regard to the planning needs for projects such as hydro based generation to ensure that communities know exactly what is needed in order to secure planning. Provide an exemption from planning fees for community owned projects where the benefits are going back to the community in any case.</p>	<p>Section 12.5.5 deals with the area of community energy projects. It is recommended in response to the OPR Submission that changes are made in relation to facilitating community wind energy projects. These proposed changes make it clear where such projects will be considered.</p> <p>Exemptions in relation to renewable energy including solar are included in the Planning & Development Regulations. Changes to these would be outside of the remit of the Planning Authority.</p>
<p>KE-C1-111 Mol Teic (t/a Dingle Hub)</p>	<p>It is recommended that particular reference is made to microgeneration and the role of community-based renewable energy projects (as provided for in the Renewable Energy Support Scheme (RESS 2). Besides generating electricity from renewable energy, this also has the potential to provide an additional (sustainable) revenue stream for farmers and others.</p>	<p>Microgeneration and community energy projects are included in Section 12.5.5 of the Draft Development Plan.</p> <p>See also response to KE-C1-233.</p>
<p>KE-C1-111 Mol Teic (t/a Dingle Hub)</p>	<p>Recognising the significant potential for community-owned renewable energy projects, it is recommended that the Council give consideration to how it could best assist communities to organise and arrange funding for such community-owned projects for example, as has been done by Údarás na Gaeltachta in respect of a project in Gaoth Dobhair).</p>	<p>Community owned RE projects are included in Section 12.5.5 of the Draft Development Plan. The local authority is willing to engage and support those proposing a community based renewable energy project.</p> <p>See also response to KE-C1-233.</p>

Recommendations

12.5.4.1.8 Extension to Existing Windfarms

In certain circumstances an extension to an existing wind farm may be considered subject to its location in an open to consideration area or repower area, and subject to best practice environmental standards and where existing infrastructure can be used. Extension to existing windfarms will not be considered within Natura 2000 sites.

KCDP 12-18 Consider extensions to an existing windfarm in areas zoned open to consideration or repower areas where it can be demonstrated to the satisfaction of the planning authority that there will be no significant adverse impact on residential amenity, the built and natural environment, or on the visual character of the landscape.

12.5.4.1.8 Extension to Existing Windfarms

In certain circumstances an extension to an existing wind farm may be considered subject to its location in an open to consideration area or repower area, and subject to best practice environmental standards and where existing infrastructure can be used. Extension to existing windfarms will not be considered within Natura 2000 sites.

KCDP 12-18 Consider extensions to an existing windfarm in areas zoned open to consideration or repower areas where it can be demonstrated to the satisfaction of the planning authority that there will be no significant adverse impact on residential amenity, the built and natural environment, or on the visual character of the landscape.

Chapter 12 – Energy - Wind Energy Development – Scartaglin Region		
	Submission Summaries	CE Response and Recommendations
See below	<p>This submission raises concerns regarding zoning and repowering of windfarms.</p> <p>In particular:</p> <ol style="list-style-type: none"> 1. Area 18 in Appendices Map 6.46 2. The zoning of the Scartaglin Region for open to consideration. 3. The zoning of existing wind farms within the Scartaglin region for repowering. <p>Concerns include visual sensitivity, noise, shadow flicker, impact on SAC and SPA, Flora and Fauna, impact on roads infrastructure, impact on peatland, proximity of turbines to boundaries, impact on residential amenities,</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.</p> <p>Reasoning of why areas were considered ‘open to consideration’ for wind energy development is included in the Wind Zoning Methodology. This Methodology has been reviewed following the recommendation on energy contained in the OPR Submission.</p> <p>Any planning application is subject to the standards in the Development Plan and would also have to comply with the relevant wind energy guidelines.</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 conditioned to be 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. See also response to the DoHLGH Submission in relation to proposed additional text in relation to repowering applications in the SPA.</p> <p>Submission KE-C1-46 suggests that townlands in the Kilgarvan area may be suitable for further assessment for wind energy development. The suggested townlands in the Killgarvan area were assessed as part of Wind</p>

		Zoning Methodology and deemed to be unsuitable for wind energy development.
<p>KE-C1-31 Patrick Galvin, KE-C1-46 Cllr. Charlie Farrelly,KE-C1-49 Marie Moloney,KE-C1-53 Fred O'Sullivan,KE-C1-65 Michael Casey,KE-C1-475 Tom Doody,KE-C1-141 Jake Fleming,KE-C1-474 Shane BrosnanKE-C1-473 Sean O Brien,KE-C1-472 Sean Gallagher,KE-C1-471 Robert Carroll,KE-C1-470 Richard Brosnan,KE-C1-469 Patrick Bradley,KE-C1-468 Paddy O Rourke,KE-C1-467 Pa Fitzgerald,KE-C1-462 Mary O Connor,KE-C1-466 Noirin Herlihy,KE-C1-465 Nicola Doody,KE-C1-464 Michael Herlihy,KE-C1-463 Michael Coakley,KE-C1-457 Julia Shea,KE-C1-461 Mary Cronin,KE-C1-460 Marie Cawley,KE-C1-85 Niall Marshall,KE-C1-459 Mandy Carroll,KE-C1-458 Katherine Carroll,KE-C1-456 John Sullivan,KE-C1-455 John Doody,KE-C1-454 Jimmy Buckley,KE-C1-453 Gillian Collins ,KE-C1-452 Edmund McSweeney,KE-C1-451 Denise Carroll,KE-C1-450 Denis Collins,KE-C1-449 Dan Cronin,KE-C1-448 Chris O Sullivan,KE-C1-406 Scartaglin Region Wind Energy Multiple Submissions,KE-C1-405 Scartaglin Region Wind Energy Multiple Submissions,KE-C1-177 Claire O Sullivan,KE-C1-176 John G Borgeat,KE-C1-158 John O Connell,KE-C1-157 Joan O Connell,KE-C1-156 Shauna Guerin Crowley,KE-C1-155 Shauna Heapes,KE-C1-154 Joan Heapes,KE-C1-153 Brenda Culloty,KE-C1-152 Conor Culloty,KE-C1-151 Tim Culloty,KE-C1-150 Norma Guerin,KE-C1-149 Chris Jones,KE-C1-144 Breda Heapes,KE-C1-143 Alicia Heapes,KE-C1-142 Fiona Fleming,KE-C1-140 Fred O Sullivan,KE-C1-139 Patrick O Donoghue (Sen),KE-C1-404 Bridget Reidy,KE-C1-325 Scartaglin Wind Awareness Group</p>		
KE-C1-84 Niall Marshall	<p>This submission raises concerns regarding Wind Energy developments. In particular: 1. Area 18 in Appendices Map 6.46 2. The zoning of the Kilsarcon, Glounlea, Knockacorrin Region for Further Assessment. Concerns include visual sensitivity, noise, impact on SAC and SPA, Flora and Fauna, impact on peatland.</p>	See Response to Scartaglin Submissions.
KE-C1-325 Scartaglin Wind Awareness Group	<p>This submission requests the following: - A 2km buffer zone (increased from 250m proposal in the current County Development Plan Draft) for the Hen Harrier around specific conservation areas for the Hen Harrier, which are clearly marked in the SPA Habitat Map. - Specific Zoning for purpose of 'Repowering' should not be included for any region within the County Development Plan until clear, transparent, up to date guidelines are ratified into Law by the Oireachtas. - Wind Energy Development Zoning for Potential Wind Farms needs to be a transparent process, which involves the local communities they affect at every stage. - It is imperative that we are aware of the European Directives regarding the protection and conservation of the SACs and SPAs as outlined in their respective European Charters and Directives.</p>	<p>See Response to Scartaglin Submissions.</p> <p>Kerry County Council is aware of all relevant European Directives and these have been complied with in relation to the procedures followed in preparing the development plan, and the policies/objectives contained in the development plan.</p> <p>Additional text and amendments are proposed in relation to the Hen Harrier SPA (see response to Dept. Of Housing, Local Government and Heritage)</p>
<p>Recommendations</p> <p>No proposed recommendations.</p>		

Chapter 12 – Energy - Wind Energy Development – Duagh		
	Submission Summaries	CE Response and Recommendations
Please see below	This submission states that Kerry already contributes a significant proportion of wind energy in comparison to its land mass. The submission seeks that the Duagh area [part of Area 22] and specifically the townlands of Ballynagraigue, Knockaneroe, Knocknacrohy, Meenscovane & Shanafona be removed from considered for wind energy purposes for the following reasons: proximity to River Feale which is part of the Lower Shannon SAC, proximity to SPA, proximity to existing housing, impact on road network, uniqueness of the River Feale valley, devaluation of properties, the loss of community, the impact of any construction in terms of noise and other disturbances, shadow flicker and the low lying valley nature of the area. [Photos have been included with the submission]	<p>The number of wind turbines in the county and their contribution to energy generation is acknowledge in the Development Plan.</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.</p> <p>Part of this methodology involved a cumulative impact assessment of existing wind turbines. The impact of existing turbines therefore formed part of the review of wind zonings in the Draft Development Plan. This document has been updated in response to the recommendation in the submission from the OPR.</p> <p>Any application would be subject to assessment as per Section 12.5.4.1.4 of the Draft Development Plan. The issues as outlined in the submission would therefore have to be addressed as part of any application.</p>
<p>KE-C1-511 Rebecca Lloyd,KE-C1-510 Paul Heffernan,KE-C1-509 Rita O’Keeffe,KE-C1-508 P Reidy,KE-C1-507 Rosaleen Sheehy,KE-C1-506 Nuala and Gerard O Brien,KE-C1-505 Niall Horgan,KE-C1-504 Mikey Kelly,KE-C1-503 Michael Carmody,KE-C1-502 Megan Maher,KE-C1-501 Sean Kirby,KE-C1-500 Maurice Stack,KE-C1-499 Mary Horgan,KE-C1-498 Margaret Heffernan,KE-C1-497 Siobhan Kelly,KE-C1-496 Thomas McNamara,KE-C1-495 M Keane,KE-C1-494 Luke O Keeffe,KE-C1-493 Timmy Dillane,KE-C1-492 Tony Maher,KE-C1-491 Tracey Horan,KE-C1-488 willie Dillane,KE-C1-490 Veronica moloney,KE-C1-489 Lucy Kelly,KE-C1-487 Karen Costello,KE-C1-486 Liam and Liliy Kirby,KE-C1-485 stop wind turbines ,KE-C1-483 Kieran and Nora Murphy,KE-C1-481 Kayleigh Sheehy,KE-C1-480 Kathleen Keane,KE-C1-479 Joseph Heffernan,KE-C1-443 John Kelly,KE-C1-446 John O Keeffe,KE-C1-442 John Horgan,KE-C1-441 Jeremiah Kirby,KE-C1-440 James Keane,KE-C1-439 Jake Heffernan,KE-C1-438 Helen Murphy Stack,KE-C1-437 Hanora Morrin,KE-C1-436 Greta Maher KE-C1-435 Catherine Horgan,KE-C1-408 Catherine & Phil Sheehy,KE-C1-407 Cathal Horan,KE-C1-401 Brendan Horgan,KE-C1-400 Adrian Collins,KE-C1-180 Mairead Connelly,KE-C1-120 Michelle Carmody,KE-C1-403 Bridget Carmody,KE-C1-512 Shane Horgan,KE-C1-514 Frank Walsh,KE-C1-216 Michael McEneaney</p>		
KE-C1-336 jimmy Moloney	This submission queries the inclusion of Area 22 – Duagh, given its proximity to the River Feale, the potential impact on biodiversity in bogs and woodlands and the number of residential properties in the area.	See response to Duagh Submissions.
Recommendations		
No proposed amendments.		

Chapter 13 – Water and Waste Management

Chapter 13 – Water and Waste Management - Introduction, Water Quality and Resources		
	Submission Summaries	CE Response and Recommendations
<p>KE-C1-270 Johnny Healy-Rae</p> <p>KE-C1-286 Maura Healy-Rae</p>	<p>The submission seeks that Kerry County Council would include steps to speed up the process of group water scheme take-overs.</p> <p>The submission states that it needs to be an objective of this plan to improve the group water scheme and ensure that everyone has access to water as it is a basic human right.</p>	<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>
<p>KE-C1-385 Cllr Jackie Healy-Rae</p>	<p>The submission states that it should be an objective to have villages without Waste Water treatment facilities upgraded immediately as it is completely unsustainable to allow it continue in term of Climate Change and for the growth of our county.</p>	<p>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>
<p>KE-C1-226 Killoccrim/Finuge Fishing Club</p>	<p>The submission states that in the interest of protecting and rehabilitating this EU designated salmon river, a policy objective should be included in the plan for KCC to liaise with OPW, IFI, Irish Water, IPWS and other relevant agencies, to install effective fish passes/mitigation action at these critical sites. IFI indicate that nature will take over to repopulate these tributaries once the blockages are removed.</p>	<p>The Draft Plan includes strong policy and objectives in relation to the protection of groundwater, rivers and streams supported by objectives KCDP 13-1 to KCDP 13-11. KCDP 13-2 seeks to achieve water quality targets by implementing the National River Basin Management Plan, which includes the level of engagement sought in the submission.</p> <p>It is an objective of the Draft Plan [KCDP 11-3] Work with all stakeholders in order to conserve, manage and where possible enhance the County’s natural heritage including all habitats, species, landscapes, and geological heritage of conservation interest and to promote increased understanding and awareness of the natural heritage of the County. The draft plan also contains a Biodiversity Action Plan in vol6.</p>
<p>KE-C1-272 Johnny Healy-Rae</p>	<p>The submission seeks that Kerry County Council would include and acknowledge the delay in extending the sewerage plant in Kenmare and therefore a lack of new housing.</p>	<p>The provision of wastewater treatment facilities is within the remit of Irish Waters capital investment programme, Irish Water, as the statutory sanitary authority, have recently been granted permission (reg ref 22/55) for the upgrading of the WWTU in Kenmare.</p>
<p>KE-C1-291 Johnny Healy-Rae</p>	<p>The submission seeks that stand alone housing estates which are not in Kerry County Council’s charge and are not connected to the public sewerage system would be accommodated in this plan to carry out work to bring them up to standard and avail of the money now available from the department to this.</p>	<p>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.</p>

		In relation to unfinished estates, it is the policy of the Council to address the issue of unfinished housing estates in the County by implementing the guidance manual Managing and Resolving Unfinished Housing Developments (DoECLG 2011). It is considered acceptable to include a new objective which supports the completion of ghost estates (on residential zoned land) particularly where all services are already in-situ. See also submission KE-C1-79
KE-C1-39 Coiste Forbartha na Sceilge & Ballinskelligs Environmental Action Group (B.E.A.G.)	The submission calls for the urgent need for upgrading the wastewater system in Ballinskelligs. The group would like KCC to explore the possibility of getting an Integrated Constructed Wetland (ICW) similar to the ones already operating in Kerry in Lixnaw , Rossbeigh and Brandon and would like to explore this option to see if it can solve the problems in Ballinskelligs and provide a future proofed public waste water management system for the area.	Kerry County Council has identified 24 priority settlements (including Ballinskelligs/Dungeagan) 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
KE-C1-411 Frank Quilter KE-C1-39 Coiste Forbartha na Sceilge & Ballinskelligs Environmental Action Group (B.E.A.G.) KE-C1-363 NEWKD	This submission outlines the how the application of the Integrated Instructed Wetland (ICW) concept could be applied for the management and treatment of polluted waters in County Kerry. This submission seeks the inclusion of additional wording to Objective KCDP 13-16.	The council is generally supportive of the idea of ICWs, at appropriate locations and in the right circumstances. There are a number of private ICW systems operational in the county. It is essential that these systems are designed appropriately and in accordance with the current relevant national guidance documents, and that they are well constructed and subsequently maintained thereafter. In addition, IW have constructed a number of ICW treatment systems here in Kerry, including in Rossbeigh, Brandon and Lixnaw. The Lixnaw Integrated Constructed Wetland was completed in December 2020 and is now fully operational and at the commissioning phase. Further to the submission, it is recommended to amend text in Chapter 13 as detailed below. Recommendation Amend KCDP 13-16 as follow: Facilitate and support Irish Waters Investment Plan 2020-2024 and Small Towns and Villages Growth Programme (STVGP) and any other successor capital plans/ strategies in the county, <i>including the consideration of Integrated Constructed Wetlands (ICW), at appropriate locations, which have the added benefits of providing any amenity area for the public and enhance biodiversity.</i>
KE-C1-288 Maura Healy-Rae	The submission seeks that an objective is included in the plan providing grants for treating new and existing private wells	Policy in relation to the provision of grants for treating new and existing private wells does not fall within the scope or remit of the CDP.

KE-C1-318 Danny Healy-Rae		
KE-C1-285 Maura Healy-Rae KE-C1-318 Danny Healy-Rae	The submission states that there needs to be some understanding in place between Irish Water and KCC in relation to providing free/available connections for people who may wish to connect to Irish Water infrastructure.	The matter of water connections policy is dealt with by the Commission for the Regulation of utilities (CRU) in consultation with Irish Water.
KE-C1-239 Johnny Healy-Rae	The submission seeks adequate zoning for treatment plants in each settlement area.	<p>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.</p> <p>Kerry County Council has therefore identified 24 priority settlements 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). See Volume 1 Appendices- KCC Submission to Irish Water (STVGP).</p> <p>It is not considered feasible to identify and zone lands for infrastructural projects as these are carried out on a case-by-case basis. It is the policy of the council as indicated on the Zoning matrix in Vol6 that public facilities and infrastructure are “Open to consideration” across all zoning designations.</p>
KE-C1-358 Cllr. Breandán Fitzgerald	The submission states that the lack of investment by Irish Water and a lack of clarity in their plans makes it impossible to develop towns and villages.	<p>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.</p> <p>Kerry County Council has therefore identified 24 priority settlements 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). See Volume 1 Appendices- KCC Submission to Irish Water (STVGP).</p> <p>It is not considered feasible to identify and zone lands for infrastructural projects as these are carried out on a case-by-case basis. It is the policy of the council as indicated on the Zoning matrix in Vol6 that public facilities and infrastructure are “Open to consideration” across all zoning designations.</p>

<p>KE-C1-195 Caroline Hurley</p>	<p>The submission states that there are wastewater issues as well as water pollutant issues on freshwater. The submission states that assessing of facilities and amenities needs to be carried out for new developments.</p>	<p>Policy and objectives in relation to the protection of water quality are specifically detailed in Chapter 13 of the CDP. There is an overarching requirement for the LA to ensure compliance with the Water Framework Directive now into its third cycle. Any works proposed to, at or within a waterbody would require an environmental assessment under the EIA, Habitats and Water Framework Directive. The current draft River Basin Management Plan 2022 – 2027 addresses these water quality matters</p>
<p>KE-C1-137 Liam Geary</p>	<p>The submission seeks reintroduction of water rates or household rates for domestic properties – cannot have a service without it being funded</p>	<p>This is not an issue within the remit of the plan.</p>
<p>KE-C1-80 Kerry IFA</p>	<p>-IFA seek that Kerry County Council provide grant aid for the repair of leaking septic tanks on environmental grounds.</p> <p>-Kerry IFA requests the County Council to acknowledge that every farmer in the county has a right to bore a well on his land and source water for his family and Livestock.</p>	<p>Policy in relation to the provision of grants for septic tanks does not fall within the scope or remit of the CDP. National policy in relation to same is for the consideration of the Department of Housing, Planning and Local Government. The CDP does however support the roll out of any such grants and will continue to oversee its duties in relation to compliance with the provisions of the Water Framework Directive.</p> <p>Policy and objectives in relation to water sources/groundwater are outlined in Section 13.2.1.4 and provide details on the information required by any application seeking to access groundwater sources. Each application has to be assessed on a site by site basis as detailed in the aforementioned section</p> <p>The sinking of a well for the purpose of providing a water supply (see class 44 Planning & Development Regulation 2001 as amended)</p>
<p>KE-C1-107 John O'Sullivan</p>	<p>The submission sets out the following: This submission raises concern about the quality of water supplies in Kerry as reported by the EPA and also raises concerns regarding the reporting of these quality failings. The submission raises the issue of pesticides and the need to outline more water sources than Lough Guitane, particularly in north Kerry.</p>	<p>The CDP and associated SEA ER provide an overview of the pressures on water resources in the county, the latter acknowledges and discusses pressures from pesticides; urban and wastewater discharges; agriculture and forestry. Information and monitoring of licenses/audits issued by the EPA are made publicly available via the EPA's websites and via annual monitoring reports as communicated to IW, KCC and the public. All this information is publicly available and accessible. The LA is fully aware of its obligations in relation to the management and protection of water resources in the county and seeks to work with IW and other stakeholders to identify pressures and seek solutions. The CDP outlines policy and objectives in relation to proper planning and sustainable development and the protection of water quality as detailed in Chapter 13. There is an overarching requirement for the LA to ensure compliance with the Water Framework Directive now into its third cycle, this includes aligning population growth/spatial planning with the sustainable management of water supply and waste water treatment in consultation with IW. Lough Guitane is a significant source of water supply for the county and this is reflected in the plan. The provision of drinking water across the county however from natural surface waterbodies or groundwater bodies is acknowledged in the CDP. All of these sources, which includes any source in North Kerry, are afforded the same objectives and policy as outlined in Chapter 13 and further to compliance with the</p>

		<p>Water Framework Directive. It is not deemed necessary to include an exhaustive list of every abstraction and/or discharge from/into every waterbody in the county. Rather the plan acknowledges the challenges and recommends policy/objectives that seek to find solutions. A more detailed analysis of the implementation of the plan on water resources in the county is outlined in the SEA ER which includes a discussion on the issues raised in the submission specific to North Kerry.</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. It is also the policy of the council through the Biodiversity Action Plan and the All Ireland pollinator plan to seek a reduction in the use of pesticides within the council's own functions and responsibilities. Irish water are currently carrying out an assessment of strategic Water Resources and are developing a National Water Resources plan comprised of 4 dedicated regional plans which plans will be available for public consultation later this year .</p>
<p>KE-C1-107 John O'Sullivan</p>	<p>The submission states that a list of sewage treatment plants at over capacity is not included in the plan and the submission includes a map of this information and states that this lack of sewage treatment is preventing economic development in the county. The submission also raises issues regarding logs of desludging at sewage plants. Despite being continuously refused funding by Irish Water, KCC continue, unsuccessfully, to request funding from Irish Water. Irish Waters submission to this CDP regarding adequacy of sewage treatment plants needs to consider the additional population influx from tourism.</p>	<p>Chapter 3 outlines the county's Core Strategy and Settlement Hierarchy over the lifetime of the plan. This outline projected population growth in the county and allocates population growth within a settlement hierarchy and growth allocation. It is noted that this settlement hierarchy is dictated by available capacity of water infrastructure, notably wastewater infrastructure. Chapter 3 was written in consultation with the future plans of IW and further to environmental and infrastructure constraints identified across the county. Settlements not allocated population growth are predominantly excluded if there is not sufficient wastewater capacity or no immediate plans to upgrade waste water infrastructure – thereby ensuring proper planning and sustainable development. The plan goes on to acknowledge that 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.</p> <p>Kerry County Council has specifically identified 24 priority settlements 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). See Volume 1 Appendices- KCC Submission to Irish Water (STVGP). KCC will continue to work with IW to seek funding to improve infrastructure.</p> <p>Information and monitoring of licenses/audits issued by the EPA are made publicly available via the EPA's websites and via annual monitoring reports as communicated to IW, KCC and the public. All this information is publicly available and accessible and is not deemed necessary to list the results of each EPA report in the CDP. Rather, the LA is fully aware of its obligations in relation to the management and protection of</p>

		water resources in the county and seeks to work with IW and other stakeholders to identify pressures, seek solutions and detail policy for the proper planning and sustainable development of the county.
KE-C1-262 Maura Healy-Rae KE-C1-311 Danny Healy-Rae KE-C1-385 Cllr Jackie Healy-Rae	The submission seeks that it is an objective of the plan to deliver investment for the provision of treatment plants in places such as Beaufort, Currow, Headford, Kilcummin, The Spa, Scartaglin etc to allow for development.	<p>The council will continue to maintain and provide additional key infrastructure and to work with other agencies including IW.</p> <p>It is acknowledged that the provision of adequate wastewater infrastructure facilities is a main tenet of the development of settlements for residential and economic purposes. A significant number of smaller settlements (including Beaufort, Currow, Headford, Kilcummin, The Spa, Scartaglin etc) in the county have inadequate wastewater treatment or limited capacity which restricts the development of these settlements. Kerry County Council has therefore identified 24 priority settlements 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). See Volume 1 Appendices- KCC Submission to Irish Water (STVGP).</p> <p>It is essential that Irish Water invest in wastewater infrastructure to enable these settlements to grow</p> <p>It is an objective of this plan to permit clusters of housing served by individual wastewater treatment systems in the small villages and small village settlements listed in Table 5.1 where there is no wastewater infrastructure or no plans for such infrastructure.</p>
KE-C1-382 The Kerry Food Hub	The submission states that the Firies area will require scope for additional capacity in the sewer system.	The WWTU is at capacity and is included in the Irish Water STVGP
<p>Recommendations</p> <p>Amend KCDP 13-16 as follow: Facilitate and support Irish Waters Investment Plan 2020-2024 and Small Towns and Villages Growth Programme (STVGP) and any other successor capital plans/ strategies in the county, <i>including the consideration of Integrated Constructed Wetlands (ICW), at appropriate locations, which have the added benefits of providing any amenity area for the public and enhance biodiversity</i></p>		

	Chapter 13 – Water and Waste Management - Waste Management	
	Submission Summaries	CE Response and Recommendations
KE-C1-3 Department of Environment, Climate and Communications	<p>Summary</p> <p>This submission requests that the Local Authority would consult directly with their respective Regional Waste Management Planning Office regarding development of the final plans.</p>	<p>Response</p> <p>Submission is noted. The Local Authority has consulted with the respective Regional Waste Management Planning Office – namely the Southern Region Waste Management Office. The Southern Region Waste</p>

		Management Office made a separate submission [see Submission KE-C1-375] and proposed amendments arising from this submission.
KE-C1-62 Seamus Fleming	There should be proper innovative and pro-active response to the scourge of illegal littering, dog-fouling & illegal dumping in Kerry including pursuing stronger laws and enforcement measures and educational programmes.	The role and responsibility of the council as regards enforcement of various environment legislation is laid out in relevant legislation – planning, waste (including littering), water etc. Within its role and functions, the council already investigates and prosecutes any non-compliance with relevant legislation – including littering/dog fouling. The council has an active enforcement section working and prosecuting within the fields of planning, waste, water etc. KCC’s Environmental Awareness Officer works with the community on education/awareness raising initiatives. The existing operation and policy in relation to same is overseen by existing legislation which is already supported in the CDP namely via Chapter 11 and 13. It is therefore considered that the issues raised in the submission are satisfactorily addressed. The County Council’s Litter Management Plan 2017-2019 (LMP) outlines the Council’s commitment to the environment and litter prevention in the County. It is the policy of this plan to prevent and minimise litter in the County as a whole, including the incidence of illegal dumping, dog fouling. This is to be achieved through education and awareness, community involvement, litter prevention and control and enforcement. Projects such as the green Schools programme are an example of collective approach to this ongoing problem .
KE-C1-165 Kate Carmody	The submission states that it is a huge issue in north Kerry that there are no civic amenity sites., -Kerry County council should seek to secure EU funding to run a pilot study into the remediation of our historical landfills which pose and environmental hazard.	Submission noted. The future roll out of waste infrastructure in the County will be guided by the upcoming National Waste Management Plan for a Circular Economy (NWMPCE), which will replace the Southern Region Waste Management Plan 2015-2021 and the regional waste management plans for the other two regions. As regards historic landfill sites , the Council, through its environment section presently collaborates with the EPA and other relevant stakeholders in the monitoring of landfill sites and other waste facilities in the county. Funding streams are currently being availed of to assess and manage any remediation work required at these sites .
KE-C1-370 M Shanahan	This submission requests that clothing banks are included in civic amenities, which should be more strategically and conveniently located.	Section 13.3.2 deals with civic amenities. It is an objective to (13-29) Facilitate the sustainable provision of additional waste recycling/recovery facilities at appropriate locations. The Council will facilitate the sustainable provision of additional waste facilities at appropriate locations in accordance with the Waste Management Infrastructure Guidance for Siting Waste Management Facilities 2015-21. The Council also operates recycling facilities. These facilities allow for the recycling of a broad range of waste material. In addition, the Council has achieved its targets as set

		<p>out in the Regional Waste Management Plan for the provision of Bring Banks, with a total of 88 Bring Banks located at various locations around the County.</p>
<p>KE-C1-375 Southern Region Waste Management Office</p>	<p>The submission requests the inclusion of the following wording at the end of Section 13.3.1 "This Guidance will be included in the upcoming National Waste Management Plan for a Circular Economy (NWMPC), which will replace the Southern Region Waste Management Plan 2015-2021 and the regional waste management plans for the other two regions."</p> <p>In Section 13.3.3, the submission suggests that reference be made here to the European Commission's more recent Circular Economy Action Plan: A New Circular Economy Action Plan for a Cleaner More Competitive Europe, launched in March 2020 and the Waste Action Plan for a Circular Economy - Ireland's National Waste Policy 2020-2025 which was published in September 2020. These should also be referenced in Objective KCDP 13-39.</p> <p>In Section 13.3.6, the submission suggests that references are updated to the most recently published guidelines, Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects, published in 2021 by Environmental Protection Agency.</p>	<p><u>Waste management</u></p> <p>The plan states that the provision of a properly regulated, environmentally sustainable waste management infrastructure is a critical element of the County's infrastructure. It is prudent to ensure that the plan refers to the most up to date relevant guidance, it is therefore considered acceptable to amend section 13.3.1 (pg235) to read as follows;</p> <p>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. This Guidance will be included in the upcoming National Waste Management Plan for a Circular Economy (NWMPC), which will replace the Southern Region Waste Management Plan 2015-2021 and the regional waste management plans for the other two regions.</i></p> <p>And include references to the following in section 13.3.3 & 6 and 1.5.4.16(vol6);</p> <p><i>A New Circular Economy Action Plan for a Cleaner More Competitive Europe,</i></p> <p><i>Waste Action Plan for a Circular Economy-Ireland's National Waste Policy 2020-2025</i></p> <p><i>Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects, published in 2021 by Environmental Protection Agency (x2)</i></p>
<p>Recommendations</p> <p>Amend Section 13.3.1 (pg235) to read as follows;</p> <p>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. This Guidance will be included in the upcoming National Waste Management Plan for a Circular Economy (NWMPC), which will replace the Southern Region Waste Management Plan 2015-2021 and the regional waste management plans for the other two regions.</i></p> <p>And include references to the following in section 13.3.3 & 6 and 1.5.4.16(vol6);</p> <p><i>A New Circular Economy Action Plan for a Cleaner More Competitive Europe,</i></p> <p><i>Waste Action Plan for a Circular Economy-Ireland's National Waste Policy 2020-2025</i></p> <p><i>Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects, published in 2021 by Environmental Protection Agency (x2)</i></p>		

Chapter 14 - Connectivity

Chapter 14 – Connectivity - Planning Policy Context, Sustainable Travel and Road Network		
	Submission Summaries	CE Response and Recommendations
KE-C1-346 Kerry Green Party	<p>The submission seeks the inclusion of an additional Objective in Section 14.3 which would state “Work with schools and any appropriate stakeholders to find creative ways to support active travel to schools, both in urban and rural areas, including for example creation of cycling infrastructure, covered bike storage spaces and parking-free zones to ensure the safety of students actively travelling” as rural children should be enabled and empowered to cycle or walk to school.</p>	<p>The Council acknowledges that there is a need for continued collaboration with the wider communities and with all agencies and stakeholders to deliver on the plans and projects.</p> <p>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.</p> <p>It is policy of the plan to facilitate the sustainable creation of additional walks, linkages, and cycleways in the town to promote a more pedestrian friendly environment.</p> <p>See proposed amendment to objective KCDP 4-15 as proposed under Chapter 4 – Towns & Villages.</p>
KE-C1-111 Mol Teic (t/a Dingle Hub)	<p>There is a need for a continuing marketing process to attain a modal shift; and Cycleways/walking routes/greenways should be designed and built in such a manner they receive priority over vehicular traffic, particularly large vehicles and touring buses on some roads (such as the Slea Head Drive).</p> <p>In order to underpin sustainable economic and social development, it is recommended that:</p> <p>The county should have a good quality, sustainable public transport system and effective low/zero carbon (other) transport, (which helps reduce emissions and support the transition to low carbon).</p> <p>A suitable sustainable transport infrastructure is required to be installed across the county, to underpin an effective operational sustainable transport service.</p> <p>This should also include a suitable public electric vehicle charging infrastructure and electric vehicle charging in tourist accommodation and popular tourist sites that can facilitate the simultaneous charging of multiple vehicles.</p>	<p>The county development plan provides objectives supporting modal shift throughout chapter 14, and in particular KCDP 14-3, KCDP 14-5, KCDP 14-6.</p> <p>The council welcomes the submission, Section 14.5 and in particular objective 14-41 supports this as follows;</p> <p>“Promote the sustainable delivery of a reliable, integrated, low carbon and cost-effective public transport system for the County”</p> <p>The rollout of Electric Vehicle (EV) infrastructure will be outlined in the Electric Vehicle Charging Infrastructure Strategy 2022-2025.</p>

KE-C1-137 Liam Geary	The submission seeks that road cycle lanes are made safer for cyclists with kerb dividers.	Chapter 14 provides objective support for the improvement of various forms of transport infrastructure including cycle infrastructure in particular objective KCDP 14-1 reads as follows. “Deliver sustainable transport infrastructure investments as identified for the road network, public/rural transport, and walking/cycling infrastructure.”
KE-C1-95 mike casey	The submission comments regarding the maintenance of local roads, footpaths, provision of public transport, access to Wi-Fi, and lack of access to nature walks and cycleways and a greenway. While the submission refers to the biodiversity action plan the issues raised are more reflective of the content within Chapter 14 Connectivity.	The Design Manual for Urban Roads and Streets (DMURS) provides design guidance and standards for constructing new and reconfiguring existing urban roads and streets, to ensure they are safe for pedestrians and cyclists. It is an objective of this plan to promote a more pedestrian friendly environment through the provision of traffic calming measures and improved pedestrian infrastructure. It is also 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 Dept have a schedule of works to provide for new and upgraded footpaths throughout the county. The plan provides objective support for the role out of the national broadband scheme. The Council is in the process of developing a Greenway strategy for the County in partnership with TII and National Guidelines
KE-C1-513 Mikey Sheehy	Greenways throughout the county should be linked and the planning for new routes should be a key objective in the draft CDP.	Greenways are specifically addressed in Chapters 10 & 14 of the draft plan. The Council is in the process of developing a Greenway strategy for the County in partnership with TII and National Guidelines 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 routes only and those identified are not an exhaustive list of planned greenways. The plan makes specific reference to the “development of greenways in a coordinated and linked up manner”
KE-C1-513 Mikey Sheehy	Support the development of active travel measures to promote and sustain connectivity in our towns and villages.	Chapter 14 provides a significant amount of support for active travel throughout the county, while the list of support is not exhaustive please see 14.3.3 Active Travel and objectives KCDP 14-8, KCDP 14-9, KCDP 14-10, KCDP 14-15
KE-C1-397 North Kerry Environmental Forum /Association	The submission states that a sustainable development strategy (transport) needs to be closely aligned to land use planning and the need to create more sustainable communities and refers to the Smarter Travel and the National Cycle Policy Framework and acknowledges references to active travel in the Plan. The submission states that there needs to be a shift away from current emphasis on car parking to more environmentally friendly travel such as car pooling and cycling infrastructure. The submission further states that urban sprawl and ribbon development should be avoided. The submission highlights the possibility of flexible working arrangements which will reduce commuting.	The county development plan throughout the plan provides objective support for the continuing establishment of sustainable transport and active travel throughout the county. The county development plan provides policy support for remote working hubs and greater broadband connectivity throughout the county to help support businesses and individual provide for more flexible working arrangements if they so choose to.

KE-C1-56 Coiste Forbartha na Sceilge	This submission requests that KCC construct a number in the Ballinskelligs area to increase safety for locals and visitors.	The county development plan is a high-level land use planning framework. The issues raised can be discussed at Municipal District Level within available resources. The issues can also be included at local area plan level when West Iveragh Local Area Plan 2019-2025 comes up for review.
KE-C1-385 Cllr Jackie Healy-Rae	This submission states that it should be an objective of this plan to upgrade to N23 between Castleisland and Farranfore. It states that it should be an objective of this plan to create a transport hub in Farranfore and promote the use of Kerry Airport as much as possible.	The N23 between Castleisland -Farranfore is already listed in the table National Primary/secondary roads projects under paragraph 14.4 Road network. Chapter 14 Connectivity of the draft county development plan under subsection 14.6 Air Transport refers to the strategic importance of Kerry International Airport. There are objectives within the plan supporting regional air connectivity
KE-C1-71 MJ Kearney	The road from Castleisland to Farranfore (N23) needs to be completely upgraded as part of the Killarney/Farranfore By-pass Project and should make provision for a cycle way.	The N23 between Castleisland -Farranfore is already listed in the table National Primary/secondary roads projects under paragraph 14.4 Road network of chapter 14. It is the policy of the plan to continue the ongoing upgrading, strengthening and improvement works on all regional & Local roads in a sustainable manner in compliance with the annual Roads Programmes. The Annual Roads projects for each municipal district is agreed by elected members. It is within this context that specific roads and safety issues raised within the submission should be considered.
KE-C1-12 David Monson	This submission refers to the L6072 road just off the N69 linking Banemore to Lyreacrompane.	It is the policy of the plan to continue the ongoing upgrading, strengthening and improvement works on all regional & Local roads in a sustainable manner in compliance with the annual Roads Programmes. The Annual Roads projects for each municipal district is agreed by elected members. It is within this context that specific roads and safety issues raised within the submission should be considered.
KE-C1-29 Castlecove Community Road Safety Group	This submission relates to speed limits in Castlecove Village and includes a report on what measures are they require to be put in place including Speed limits, Pedestrian Safety and General Speeding through the village.	It is the policy of the plan to continue the ongoing upgrading, strengthening and improvement works on all regional & Local roads in a sustainable manner in compliance with the annual Roads Programmes. The Annual Roads projects for each municipal district is agreed by elected members. It is within this context that specific roads and safety issues raised within the submission should be considered.
KE-C1-264 Johnny Healy-Rae	The submission seeks that Kerry County Council would endeavour to clear the Local Improvement Scheme list during the lifetime of this plan	The delivery of the LIS programme is dependent on national funding allocations
KE-C1-254 Johnny Healy-Rae	This submission states that Kerry County Council should include in the plan the provision of the second half of the inner relief road in Kenmare.	This is included in Table 14.3: Priority Roads Infrastructure Projects.
KE-C1-199 Dingle Business Chamber	The submission seeks the following: - Upgrade of the N86 continues as it is on the Wild Atlantic Wat - Upgrade of the R561 Annascaul to Castlemaine Road	The N86 and R561 are included in Table 14.3: Priority Roads Infrastructure Projects, as is the Dingle Relief Road.

	- Funding for Phase 5 of the Dingle Relief Road be secured so that the Dingle Relief Road is completed before 2025.	
KE-C1-22 Brendan O'Shea	This submission refers to Listry Bridge along the R563. It is requested that works are carried out to the bridge as it is causing traffic issues (local, tourist and economic).	It is the policy of the Plan to continue the ongoing upgrading, strengthening and improvement works on all regional & local roads in a sustainable manner in accordance with the objectives of the Plan and in compliance with the Annual Roads Programmes.
KE-C1-348 Lucian Horvat	This submission seeks the development of proper roads infrastructure on Valentia Island and on the Skellig Coast in general. The access road to Valentia Island Lighthouse (one of the main visitor attractions in the area with some 20 thousand visitors per annum) is very unsafe and in imminent danger of being washed off or partly destroyed by coastal erosion.	It is the policy of the plan to continue the ongoing upgrading, strengthening and improvement works on all regional & Local roads in a sustainable manner in compliance with the annual Roads Programmes. The Annual Roads projects for each municipal district is agreed by elected members. It is within this context that specific roads and safety issues raised within the submission should be considered.
KE-C1-358 Cllr. Breandán Fitzgerald	This submission states that the completion of the N86 Tralee to Dingle/An Daingean scheme should be included in Section 14.4.	The N86 Tralee to Dingle/An Daingean is included under table 14.4 National Primary/Secondary Roads Project
KE-C1-364 Cromane Community Council	The submission highlights the poor roads infrastructure and traffic issues experienced in Cromane due to the fishing industry.	It is the policy of the plan to continue the ongoing upgrading, strengthening and improvement works on all regional & Local roads in a sustainable manner in compliance with the annual Roads Programmes. The Annual Roads projects for each municipal district is agreed by elected members. It is within this context that specific roads and safety issues raised within the submission should be considered.
KE-C1-173 Milltown Community and Chamber Alliance	The submission raises concern that this chapter does not align with Chapter 1 & 2, and its thinking and approach are outmoded in respect of active and sustainable travel. The submission objects to the inclusion of the 'Milltown Bypass' in Table 14.3, and points out that despite constructive efforts to engage in dialogue with TII, the community has not been consulted about this project. Furthermore, the submission encourages the Council to enhance pedestrian safety in the vicinity of Milltown National School.	Table 14.3 lists the priority road infrastructure requirements for the County over the plan period 2022-2028 and beyond for National Primary/Secondary Roads Projects. Consultation has been undertaken over the past number of months and will be ongoing throughout the development of the project It is a policy of the county development plan to upgrade the strategic transport network in the County. The delivery of the Milltown Bypass has long been identified as a key element in achieving this. This a matter for the Municipal District and the Local Area Plan
Recommendations		
No changes recommended		

Chapter 14 – Connectivity - Public Transport (Rail & Bus), Air Transport and Ports, Harbours & Piers		
	Submission Summaries	CE Response and Recommendations
KE-C1-35 Cork Airport [Gary Mackin]	This submission supports Chapter 14 – Connectivity, specifically Objective KCDP 14-51 and the development of a Tri-Airport Strategy for the Southern Region (including Cork and Shannon airports).	The contents of the submission are noted and support is welcomed.
KE-C1-242 Maura Healy-Rae KE-C1-306 Danny Healy-Rae KE-C1-358 Cllr. Breandán Fitzgerald	This submission seeks that it is an objective of this plan to provide bus shelters along public transport routes.	KCDP 14 – 46 includes an objective in this regard.
KE-C1-421 Killarney Access Group	The submission states that all modes of transport need to be accessible, convenient and affordable with good connectivity. It states that the train station and bus station are not connected even though they are located adjacent to each other.	The provision of public transport is supported in the plan KCDP 14-41 - Promote the delivery of a reliable, integrated, low carbon and cost-effective public transport system for the County. Specific details in relation to providers infrastructure is outside the remit of the CDP
KE-C1-195 Caroline Hurley	The submission states that Kerry needs to improve local public transport offering and maintain current train lines. The submission highlights that due to high quality roads infrastructure this increases carbon emissions.	The provision of public transport is supported in the plan KCDP 14-41 - Promote the delivery of a reliable, integrated, low carbon and cost-effective public transport system for the County. The Plan contains specific objectives to for rail and bus transport
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional Objective in Section 14.5 which would state “Promote public transport over private vehicle and air transport, and do not support private vehicle and air transport initiatives if there are reasonable public transport alternatives that could be made available”, to achieve goal of the transition to a Low Carbon and Climate Resilient Society”.	The Council is strongly committed to the promotion of sustainable means of travel including public transport, walking and cycling and the encouragement of modal change from private car, where possible. However, the council recognizes that the private car will remain as a mode of transport for the foreseeable future, particularly in a rural county like Kerry.
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of words “and proactively support” in KCDP 14-41, so that it would read “Promote and proactively support the sustainable delivery of a reliable, integrated, low-carbon and cost-effective public transport system for the County” as not doing so would contravene the second goals of KCDP, “The transition to a Low Carbon and Climate Resilient Society”.	The policy of the plan as set out is considered very clear and does not require the proposed amendment
KE-C1-107 John O'Sullivan	The submission states that there is no public transport in the most deprived area of the county is the area around Ballylongford, Tarbert, Moyvane.	The plan is supportive of the expansion of the Local Link Rural Transport Programme ... See Objective KCDP 14-45
KE-C1-111 Mol Teic (t/a Dingle Hub)	Coordination will be required between the relevant bus service providers (Local Link Kerry, Bus Eireann and any relevant private operators) to ensure integration of services, seamless ticketing, origin to destination fares, etc.	Objectives KCDP 14 – 41 and KCDP 14-45 support this submission

<p>KE-C1-183 Local Link Kerry</p>	<p>The submission contains a significant quantum of suggested amendments to text within the Chapter 14 connectivity of the draft county development plan. It is requested to amend many objectives;(see capitals)</p> <p>Chapter 14 Connectivity 14.3 Sustainable Transport National and regional transport policy emphasises the need to reduce the demand for reliance on the private car in favour of public transport, cycling and walking –TEXT IN THIS PARAGRAPH BE AMENDED TO INCLUDE REFERENCE TO ‘CAR SHARING / CAR POOLING’.</p> <p>Figure 14.1: Modal and Intervention Hierarchy – NIFTI – UNDER ‘PRIVATE VEHICLES’, INCLUDE CAR SHARING / CAR POOLING.</p> <p>14.3.1 Sustainable Transport Planning It is requested to amend;(see capitals) THIS SECTION SHOULD INCLUDE THE PROVISION, (WITH NTA FUNDING) OF SUITABLE ATTRACTIVE, FUNCTIONAL AND ACCESSIBLE BUS SHELTERS AND BUS STOPS IN TOWNS AND VILLAGES.</p> <p>Sustainable Transport and Mobility It is requested to amend;(see capitals) KCDP 14-3 Support and promote the sustainable development of walking, cycling, public transport and other sustainable forms of transport, as an alternative to the private car, by facilitating and promoting the sustainable development of necessary infrastructure (SUCH AS, BUS STOPS AND BUS SHELTERS THAT WILL INCLUDE REAL TIME PASSENGER INFORMATION) at appropriate locations and by promoting initiatives contained within “Smarter Travel, A Sustainable Transport Future 2009-2020” and the “National Cycle Policy Framework” and any future national sustainable mobility policy. KCDP 14-4 Promote and support AN INCREASE IN THE NUMBER AND USAGE OF ELECTRIC VEHICLES and the expansion of the Electric Vehicle charging network (through direct provision by State agencies and in partnership with energy suppliers e.g., in the hospitality and retail sector) (THESE CHARGERS NEED TO BE FAST CHARGING AND CAPABLE OF SIMULTANEOUS CHARGING OF MULTIPLE VEHICLES) KCDP 14-5 Specify baseline figures and targets for modal share in new / varied Local Area Plans to encourage a modal shift (IN A DEFINITIVE TIMELINE) away</p>	<p>Throughout chapter 14 the county development plan makes reference and provides supports via objectives for alternative forms of sustainable transport in an effort to shift away the emphasis from the private vehicle from being the predominant form of vehicular transport in our county. The submission makes a significant amount of proposed wording changes within this section.</p> <p>Amend 14.4 to include reference to Car Sharing/Car Pooling</p> <p>This is the standard Modal Intervention hierarchy – NIFTI and as such will not be amended</p> <p>Amend 14.3.1 to include “Will facilitate the provision of suitable attractive, functional and accessible bus shelters and bus stops in towns and villages”</p> <p>KCDP 14 -3 Necessary Infrastructure implies the examples quoted</p> <p>Amend text to include; KCDP 14-4; An increase in the number and usage of electric vehicles</p> <p>The Electric Vehicle charging Strategy 2022-2025 will determine the type charging required</p> <p>The inclusion of Car Sharing/Car pooling in this Objective would be difficult to measure</p>
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	<p>from the private car to more sustainable forms of transport, such as public transport, CAR SHARING / CAR POOLING, cycling and walking.</p> <p>KCDP 14-7 Promote and support the provision of new technologies on decarbonising transport. SUPPORT THE MOVE TO ELECTRIC VEHICLE (EV) OR HYDROGEN. LOOK AT ESTABLISHING A COUNTY EV CHARGING NETWORK THAT HAS CAPABILITY TO ENSURE ELECTRICITY SUPPLY CAN MEET THE DEMAND IN CERTAIN AREAS.</p> <p>Active Travel & Greenways It is requested to amend;(see capitals) KCDP 14-9 Continue to work with BUS EIREANN, TFI LOCAL LINK KERRY AND OTHER transport providers, agencies and stakeholders to facilitate the integration of active travel (walking, cycling) with public transport and car sharing KCDP 14-12 Protect AND USE established/historic railway corridors throughout the County for recreational development. KCDP 14-16 Facilitate and support the provision of bicycle parking facilities throughout the county's settlements. (ENSURE THERE ARE BICYCLE PARKING FACILITIES AT BUS STOPS / SHELTERS.)</p> <p>14.3.4 Land Use Integration & Local Transport Plans Seeks to provide Local Transport Plans to areas outside Tralee/Killarney/Listowel</p> <p>KCDP 14-18 Enhance and improve regional connectivity through upgraded transport infrastructure (INCLUDING BUS SHELTERS / BUS STOPS) CARRY OUT A FULL AUDIT OF ALL BUS STOP LOCATIONS IN THE COUNTY.</p> <p>KCDP 14-19 Improve access TO ALL MODES OF TRANSPORT for all vulnerable road users and people with disabilities {TO ALL MODES OF TRANSPORT} thereby increasing and improving transport facilities for all users. ENSURE THAT A MINIMUM STANDARD OF REQUIREMENTS FOR ACCESS IS APPLIED TO ALL VEHICLES.</p> <p>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. (DINGLE DAINGEAN UI CHÚIS / DINGLE PENINSULA SHOULD BE INCLUDED AS A KEY TOWN / SETTLEMENT)</p>	<p>KCDP 14-7 is a specific objective looking a broad range of new technologies .. the proposed text additions do not add to this objective</p> <p>Amend as follows KCDP 14-9 Continue to work with Bus Eireann, TFI Local Link Kerry and other transport providers, agencies and stakeholders to facilitate the integration of active travel (walking, cycling) with public transport</p> <p>KCDP 14-12 Objective relates to the protection of lines</p> <p>KCDP 14-16 Current wording considered sufficient</p> <p>KCDP 14-18 clarification is not considered necessary</p> <p>KCDP 14 –19 The County development plan is not the appropriate instrument for setting standards for vehicles</p>
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	<p>14.5 Public Transport; Asks that the names of main transport providers be included in the text</p> <p>Requests that the word expansion be added to text relating to the extension and expansion of the of the Rural Transport Programme County Transport Strategy be amended to COUNTY TRANSPORTATION PLAN.</p> <p>Requests that Killorglin be included in the text re park and ride</p> <p>Public Transport It is requested to amend;(see capitals) KCDP 14-41 Promote the sustainable delivery of a reliable, ACCESSIBLE, integrated, low-carbon and cost-effective public transport NETWORK SYSTEM for the County.</p> <p>14.5.2 Bus Transport Requests that TFI be added to Local Link as a service provider in the text</p> <p>The Council will work closely with TFI LOCAL LINK KERRY, BUS EIREANN {A RANGE OF RURAL COMMUNITY DEVELOPMENT GROUPS} and allied stakeholders to identify and meet future bus transport requirements THROUGH THE CONNECTING IRELAND INITIATIVE.</p> <p>Bus Transport It is requested to amend;(see capitals) KCDP 14-45 Facilitate AND SUPPORT the development and expansion of the Local Link Rural Transport Programme & CONNECTING IRELAND INITIATIVE AS FUNDED by the National Transport Authority (NTA). KCDP 14-46 Facilitate improved rural public transport services including the provision of public {AND PRIVATE} bus services under the Rural Transport Programme AND CONNECTING IRELAND INITIATIVE and improved bus infrastructure including bus stops/shelters at appropriate locations. KCDP 14-47 Facilitate and support the NTA in its preparation of a County Transport Strategy (COUNTY TRANSPORTATION / MOBILITY PLAN) and Local Transport Plans, INCLUDING THE PROVISION FOR AN ONGOING MARKETING PLAN.</p> <p>Seeks a specific objective relating to increase bus services in the Kerry Hub & Knowledge triangle</p>	<p>These Text changes are minor and it is proposed to include</p> <p>The amendment to KCDP 14-41 is supported</p> <p>The text amendments are supported</p> <p>The minor amendments to the text of objectives 14-45, 14-46 & 14-47 are supported</p> <p>It is considered that the plan in its support of the expansion of bus services is adequate</p>
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	Requests specific objectives in relation to bus stop infrastructure	It is considered that this is adequately covered in the plan
KE-C1-147 Tarbert Development Association	Retain and if possible, expand the services provided by Local Link.	Objectives in this chapter seek 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.
KE-C1-45 Brendan O'Shea	Traffic calming and a ghost lane should be put at the main entrance to Kerry airport along the N23 for Airport traffic.	It is the policy of the plan to continue the ongoing upgrading, strengthening and improvement works on all regional & Local roads in a sustainable manner in compliance with the annual Roads Programmes. The Annual Roads projects for each municipal district is agreed by elected members. It is within this context that specific roads and safety issues raised within the submission should be considered.
KE-C1-13 Irish Aviation Authority	This submission states that the Safety Regulation Division Aerodromes of the IAA have no observations.	Comments noted
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional wording in Section 14.6, as follows "Kerry County Council acknowledges that Air Transport is an extremely carbon intensive form of travel, and air-travel is a significant contributor to climate change. As such, where reasonable lower-emission alternatives to air transport exist, as is often the case in regional journeys (such as the train from Farranfore to Dublin Heuston), it is the policy of Kerry County Council to support those alternatives rather than air transport", to be in line with the second goal of the KCDP. The submission also seeks the removal of the word 'sustainable' from KCDP 14-48 as air travel is in general not a sustainable form of transport.	The county development plan recognises the issues that are caused by unsustainable modes of transport and the impacts they have on the climate as regards climate change, in this regard the county plan provides objective support as regards modal shift example of which are throughout chapter 14, in particular KCDP 14-3, KCDP 14-5, KCDP 14-6. To use such wording as suggested in the submission would be counterproductive and negatively impact the outcomes as set out in the objectives of the plan as it would conflict with objective support such as KCDP 14-20 "Protect and sustainably develop the County's principal transportation assets including ports, Kerry Airport, and strategic road and rail corridors"
KE-C1-127 Farranfore Development Association	The submission states that the Plan should encourage Farranfore's position as a transport hub by facilitating the development of transport related facilities within the town and safeguarding Kerry Airports operation and expansion, as well as market & promote current routes available from Kerry Airport, both within Kerry, nationally & internationally, development of an integrated public transport terminal, extension of dedicated walk and cycle ways within Farranfore and continue to develop and expand the Broadband, Fibre Optic and Electricity Capacity of Farranfore.	Chapter 14 Connectivity of the draft county development plan under subsection 14.6 Air Transport refers to the strategic importance of Kerry International Airport. Regarding the improvement of infrastructure there are objectives specifically KCDP 14-48, KCDP 14-49, KCDP 14-50, KCDP 14-51, KCDP 14-52 all of which provides support for the greater provision and expansion of infrastructure at Kerry international Airport. Chapter 14 Connectivity the Draft County development plan supports the role out of the national broadband plan. Chapter 12 Energy in particular subsection 12.3 transmission grid provides support via objectives for the role out of the energy transmission grid county wide in a sustainable manner.

KE-C1-127 Farranfore Development Association	Enhance signage on approaches to Kerry Airport both from a visitor/tourist perspective as well as promoting use of routes to local population.	However, one of the aims of the Draft Plan is to support sustainable tourism within the County [Objectives KCDP 10-1 to KCDP 10-4]. Section 10.3.4.2 relates to Tourism and Wayfinding with an objective for signage provision [KCDP 10-23 & 10-24].
KE-C1-147 Tarbert Development Association	Further development of Kerry Airport to increase both overseas and business tourism. Perhaps the airport could become a Hub airport.	The Draft Plan recognizes the important of Kerry Airport as a key transport link and economic driver for the county and the regional. There are several objectives contained in the Draft Plan which relate to supporting and enhancing Kerry Airport.
KE-C1-281 Johnny Healy-Rae KE-C1-358 Cllr. Breandán Fitzgerald	The submission states that improvements should be made to Piers and harbours in terms of access, signage and facilities.	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 Submissions for individual piers should be included in the local Area plans
KE-C1-513 Mikey Sheehy	Support the expansion of connectivity links to the region including links with Cork Airport and Shannon Airport, the development of the Adare bypass and finalising a county transport plan.	The Plan recognises that “the provision of proper external road linkages from the county to National and International Networks greatly minimises the impact of peripherality”. The Draft Plan sets out several Objectives such as KCDP 14-20 “Protect and sustainably develop the County’s principal transportation assets including ports, Kerry Airport, and strategic road and rail corridors” and KCDP 14-50 states “Facilitate and support the development of an integrated multi-modal transport system to and from the airport”. Objective CDP 14-26 provides objective support for the development of the Adare, Newcastlewest and Abbeyfeale By-passes Objective KCDP 14-22 provides objective support for the preparation of local transport plans
Recommendations		
Amend 14.4 to include reference to Car Sharing/Car Pooling		
Amend 14.3.1 to include “Will facilitate the provision of suitable attractive, functional and accessible bus shelters and bus stops in towns and villages”		

Amend text to include; KCDP 14-4; An increase in the number and usage of electric vehicles

Amend KCDP 14-9 Continue to work with **BUS EIREANN, TFI LOCAL LINK KERRY AND OTHER** transport providers, agencies and stakeholders to facilitate the integration of active travel (walking, cycling) with public transport

Amend 14.5 Public Transport to include main transport providers

Requests that the word expansion be added to text relating to the extension and expansion of the of the Rural Transport Programme County Transport Strategy be amended to COUNTY TRANSPORTATION PLAN.

Amend KCDP 14-41 Promote the sustainable delivery of a reliable, **ACCESSIBLE**, integrated, low-carbon and cost-effective public transport **NETWORK SYSTEM** for the County.

Include TFI in Section 14.5.2 Bus Transport
The Council will work closely with **TFI LOCAL LINK KERRY, BUS EIREANN {A RANGE OF RURAL COMMUNITY DEVELOPMENT GROUPS}** and allied stakeholders to identify and meet future bus transport requirements **THROUGH THE CONNECTING IRELAND INITIATIVE**.

Amend KCDP 14-45 Facilitate **AND SUPPORT** the development and expansion of the Local Link Rural Transport Programme **& CONNECTING IRELAND INITIATIVE AS FUNDED** by the National Transport Authority (NTA).

Amend KCDP 14-46 Facilitate improved rural public transport services including the provision of public **{AND PRIVATE}** bus services under the Rural Transport Programme **AND CONNECTING IRELAND INITIATIVE** and improved bus infrastructure including bus stops/shelters at appropriate locations.

Amend KCDP 14-47 Facilitate and support the **NTA** in its preparation of a County Transport Strategy **(COUNTY TRANSPORTATION / MOBILITY PLAN)** and Local Transport Plans, **INCLUDING THE PROVISION FOR AN ONGOING MARKETING PLAN**.

Chapter 14 – Connectivity - Digital Connectivity		
	Submission Summaries	CE Response and Recommendations
KE-C1-171 Asdee Community Development Association	The submission highlights the lack of digital hubs in North Kerry and proposes Asdee as a location. It further highlights that there is no broadband connection point.	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.
KE-C1-147 Tarbert Development Association	High speed broadband is essential here so that people can potentially work from home.	See above response [KE-C1-171]
KE-C1-127 Farranfore Development Association	Enhance connectivity with public transport services, bus & rail & broadband connectivity.	See response to submission KE-C1-127 for public transport and KE-C1-434 for broadband connectivity.
KE-C1-138 Cllr. Michael Cahill	This submissions states that the general public should be protected from intrusive masts being erected in close proximity to family homes and residential areas, both with and without Planning Permission, i.e., exempted development.	<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. 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>Recommendation</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 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>

		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.
KE-C1-54 Samuel Moriarty KE-C1-55 Mélanie Queyroulet Baudo	This submission queries the guidelines with regards to the planning process for telecommunications masts.	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. It is within this context and section 1.14 Vol. 6 that proposals for telecommunication infrastructure are assessed.
KE-C1-98 Maria O'Shea	This submission relates to applications for telecommunications infrastructure and requests the submission of additional information on applications to assess their visual impact. The submission also suggests additional text and makes reference to separation distances.	See responses above to KE-C1-54, KE-C1-55 and KE-C1-138
KE-C1-80 Kerry IFA	The submission suggests that the Local Authority complies with the National Broadband Plan and that broadband is made available to all Farmers and Rural Dwellers in the County and speed up the process. The submissions requests that rural road networks should be maintained to an acceptable standard equitable to road standards in urban areas and that if a complaint is made to a Councillor/County Council Official in relation to road quality; a process to investigate the complaint should be put in place.	The plan provides supports in the form of objectives for the rollout of the National broadband plan, while not directly responsible for the provision of the rolling out of this critical infrastructure the plan does provide objective supports for its provision. Regarding the submission's comments on roads complaints, it is not within the remit of the planning authority or the development plan to address these issues it would more appropriately be raised with the roads section of Kerry County Council or the appropriate district engineer.
KE-C1-199 Dingle Business Chamber	The submission seeks that all properties seeks high standard of fibre connection be facilitated and that a minimum standard is set at 500mb for all.	The plan provides supports in the form of objectives for the rollout of the National broadband plan, while not directly responsible for the provision of the rolling out of this critical infrastructure the plan does provide objective supports for its provision.
KE-C1-346 Kerry Green Party KE-C1-107 John O'Sullivan	The submission states that KCC needs to refer to the recent PWC report on the HSE Cyber-attack outlining that lack of defined lines of responsibility for the strategy was the main cause.	The submission makes no reference to any planning relevant recommendations. Such an addition to the county plan would not be appropriate for a document that is solely a land use planning framework.
Recommendations		
<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 		

New objectives

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.

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.

Volume 1 Appendices - Appendix 6 – Wind Zoning Methodology		
	Submission Summaries	CE Response and Recommendations
KE-C1-95 mike casey	The submissions raises the issue that there has been no updated wind energy guidance 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.
KE-C1-419 Marianne Browne	<p>This submission states that too many wind developments have been located in North Kerry in highly populated areas and that they are more suited in coastal areas, open hill tops or open plans. These wind developments have a negative effect on tourism and the landscape.</p> <p>Also that the construction of wind turbines on peatlands can result in the destruction of the peat soil thereby upsetting the carbon accumulation process, leading to an increase in the amount of carbon dioxide released into the atmosphere. Therefore, peatlands should be ruled out at planning policy stage so as to strategically guide development to more appropriate land.</p>	<p>The level of wind farm development has been acknowledged 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.</p> <p>Peat is considered to be a constraint to wind energy development in the Wind Zoning Methodology, and the development of any new wind farms on peat soils is not supported by the development plan as they have been determined to be unsuitable for wind farm development.</p>
KE-C1-425 Patrick J. Gilbert	This submission states that there is an over concentration of wind farms, especially in North Kerry and that needs to be taken into account when assessing and zoning re-powering and open to consideration areas for wind farm development.	See response to KE-C1-419
KE-C1-385 Cllr Jackie Healy-Rae	The submission requests clarity on the 'Areas of Further Assessment' for wind energy zoning, it needs to be made clear that the assessments for these areas are indeed finalised and that Map 12.4 is the final product of all the councils assessments.	<p>Areas for Further Assessment form one step of the Wind Zoning Methodology as contained in the Appendices to Volume 1 of the Draft Development Plan. It is set out in the introduction to this section that "following the identification of constraints in Step 2, the remaining areas of the county can be assessed with regards to their visual sensitivity to wind energy development.</p> <p>Following the assessment of the area a conclusion is reached as to whether the area is sensitive to wind energy development or has wind energy potential. Each of the 27 areas have been analysed comprehensively with potential for wind energy identified in 4 of the areas. The outcome of assessment has been incorporated into the Draft Development Plan as Map 12.4. With the zoning of areas in the</p>

		Development Plan it completes the process of the Wind Zoning Methodology.
KE-C1-75 Paul Mc Sweeney KE-C1-76 Paul Mc Sweeney	Redesignate land at Gortnakilla, Clonkeren, Killarney, County Kerry for the purpose of open for consideration for renewable energy type developments	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.
Recommendations		
No proposed amendments. See response to OPR submission [KE-C1-365]		

Volume 2 – Town Development Plans

Volume 2 – Town Development Plans - Tralee		
	Submission Summaries	CE Response and Recommendations
KE-C1-188 Tralee Chamber Alliance	<p>1. Generic recommendations</p> <p>The Tralee Chamber Alliance submitted an extensive submission dealing with a wide range of policy areas many of which are included in the plan. The Chamber seeks alignment with the NPF and RSES regarding population growth for Tralee, compact growth, brownfield regeneration and enabling infrastructure and a high quality public realm for future growth. The submission seeks to co-ordinate planning policy across the county, and to prioritise the delivery of sustainable public transport and active travel projects. The submission also seek clarity in relation to implementation of projects.</p> <p>2. Specific Recommendations</p> <p>-The National Policy Objective 3b of the NPF requires that at least half (50%) of all new homes should be constructed within existing built-up footprints for the major Urban Areas, and 30% in all other Urban areas.</p> <p>– Tralee as the capital town should have a target of 50% of all new housing built in the urban area if the town is to achieve real growth. The Submission also proposes particular densities for Tralee town centre</p>	<p>1. Generic Recommendations</p> <p>The submission of the Chamber is welcome, and its broad recommendations are consistent with the policies contained both within the Town Development Plan and the relevant chapters of the county development plan which should henceforth be read in unison as the formal planning policy for Tralee. The generic recommendations outlined by the Chamber are all covered in the plan and it is considered that no modification or additional text is required in relation thereto. The timeline for the implementation of projects is dependent on a number of factors, including the state of the economy, national funding, availability of appropriate resources, government priorities and unforeseen circumstances such as those we have witnessed over the past two years.</p> <p>2. Specific Recommendations</p> <p>The NPF standard for Tralee is 30% and this is included in the Plan</p> <p>The existing Tralee town plan states that all new development must comply with the Department of Environment, Heritage and Local Government publication, guidelines for Planning Authorities on 'Sustainable Residential Development in Urban Areas' and this is re-iterated in this plan through objective TR-15. Higher residential densities can be considered within the town centre or close to the centre, areas within walking/cycling distances to the town. Specifics in relation to density figures are</p>

	<p>-Under the housing for all strategy utilise vacant, derelict and underutilised properties in towns and provide incentives to develop over the shop residential units in the town centre. Residential units should be suitable for a mix of occupancy including young professionals relocating to the town for work purposes to young families looking for affordable accommodation.</p> <p>Student residential development should be prioritised in planning for existing 'above the shop' vacant properties in a coordinated manner in the town centre</p> <p>-The SDZ's (strategic development zones) / brownfield sites need a specific plan with timelines –KCC must identify a preferred range of uses and the support/incentive they will give for their redevelopment.</p>	<p>outlined in the department guidelines and Tralee town plan and therefore do not need to be re-stated in this plan. The town plan goes further to encourage a mix of house types within developments especially on opportunity sites, where it is a requirement that all new residential development schemes (over five units) provide for a mix of house types in order to meet and adapt to the changing demographic trends and household profiles</p> <p>Chapter 7 Housing for All covers this subject in detail and has significant objects in relation to the reuse of derelict and vacant properties. While the existing policies in the Tralee Town Plan and County Plan support this submission, the following additional text is proposed for the Tralee Plan.</p> <p>In compliance with national policy, it is envisaged that at least 30% of all new housing development in Tralee shall take place on infill and brownfield sites. This is supported by Objective KCDP 3-4 which requires that at least 30% of new housing development to be delivered within the existing built-up areas on infill and or brownfield sites in Tralee. The Council have identified a number of sites and areas that require attention in order to stimulate urban renewal and regeneration and target high vacancy levels. In order to encourage investment such areas will receive favourable consideration in terms of significantly reduced development contributions including a reduction of 75% in areas/streets that are identified in the Plan as suitable for renewal and regeneration. While retail development will receive a 33% reduction on lands zoned town centre.</p> <p>Insert new text into Section 1.4.2 of Volume 2, Tralee.</p> <p>"There is significant potential for increasing the population of the town core through the reuse of vacant and derelict properties and through maximising the use of upper floors in town centre properties. This plan supports the development of residential properties in Tralee Town Centre both for social and private housing developments, for families and individuals and for student residential developments."</p> <p>OBJ TR 13A Facilitate the reuse and redevelopment of town centre derelict/vacant and underutilized properties in Tralee Town Centre both for social and private housing developments, for families and individuals and for student residential developments</p> <p>In relation to Strategic Development Zones (SDZ), designations are matter for the relevant Minister and are not a function of the Planning Authority as per Section 166 of the Planning and Development Act 2000, as amended. The Town Plan identifies a number of opportunity sites which outline broad parameters for the development of</p>
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	<p>-The National Recommendation around having a 3rd level presence in the town centre needs to be included in the Development Plan – a clear plan is required that would see MTU with a physical presence in the town centre</p> <p>A Retail Plan must be done specifically for Tralee and not as part of a wider County Wide Retail Strategy, and it needs to be completed as a priority. Tralee’s retail sector is the town’s biggest employer, and plan must address the disconnect between Manor and Town Centre.</p> <p>-Clash has been rezoned to a mixed use – We no longer have industry standard of Enterprise Zones in Tralee. Stricter Planning enforcement and specific zoning is required to ensure appropriate businesses are based there – a specific Masterplan for the redevelopment and expansion of both existing Industrial Parks (Monavalley and Clash) is required that would allow Tralee attract more industry/R&D to these two locations. In particular Clash has significant vacancy, under-development and lapses/poor judgement in planning.</p> <p>The submission seek to support a number of tourism initiatives and plans that relate to Tralee</p> <p>Development of Community Hubs and Independent Living Housing for the older people and people with disabilities in Moyderwell and Balloonagh</p>	<p>these sites. The larger sites including John Joe Sheehy Road, and the Island of Geese are subject to existing or new masterplans</p> <p>The Council has been supportive of developing a third level education presence in the town centre and this has been successfully achieved with KETB in Denny Street. It is proposed to add the following additional text to the Plan “<i>This Plan supports the extension of 3rd level education facilities in Tralee Town Centre. This will assist in linking 3rd Level institutions the MTU and KETB with social and commercial life of Tralee and improve the vibrancy of Tralee Town Centre. The plan supports partnerships between 3rd level institutions and private and public enterprises.</i>”</p> <p>Amend OBJ TR 52 to read: Support and promote the future development of the Munster Technological University and Kerry ETB’s Higher Education Facilities in Tralee, including the establishment and strengthening of their Town Centre presence.</p> <p>Amend OBJ TR 53 to read: Support higher and further education and training investment, research investment and collaborations with both public and private enterprises</p> <p>A Retail Strategy will be undertaken for the County with specific recommendations for Tralee and other major settlements With respect to Clash/Monavalley industrial estates the proposed zoning M4 built up area simply reflects the already developed nature of the area. The zoning however will not permit town centre type developments such as retailing and other such uses in order to protect and promote a vibrant and strong Tralee town centre. In addition, the racecourse lands at Ballybeggan have been zoned C6, Mixed/general commercial/ industrial/enterprise. It is recommended that a masterplan be required for the overall development of these lands. As it is a priority of the Planning Authority to promote the town centre for business and retailing, such uses that would be more suitably accommodated within the town centre will not be permitted at this location.</p> <p>The Plan includes significant proposals for the development of Tourism in Tralee, including many of the individual projects identified in the Tourism in Tralee Action plan to 2025. Obj TR54 – TR 68. These projects will be incorporated into the Cliff Coast DEDP and will have a formal basis for seeking funding.</p> <p>New Objective TR 68A Facilitate and support the delivery of projects that will be identified in the Cliff Coast DEDP.</p>
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	-Develop the recommendations made under the '10-Minute Town, Accessibility and Framework Report for Carlow, Ennis and Tralee (July 2020)	<p>Strong policy included in both Tralee Plan, Chapters 6 & 7 of CDP</p> <p>The provision of community facilities is an ongoing priority of the Planning Authority, the Town Development Plan supports this with a number of objectives. Central community hubs for older people and independent living accommodation for people with disabilities will be facilitate throughout the town and especially on the Balloonagh Opportunity site. As an example, the refurbishment of Moyderwell Convent as a Day Care Centre, with an accompanying sheltered housing complex of 56 apartments has ensured a long-term sustainable use of this historic protected structure. The development of Áras an Phobal provides a community and service resource for the wider population and has helped in transforming the vitality of the area</p> <p>10-Minute Town - 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</p>
KE-C1-346 Kerry Green Party	The submission seeks an amendment to Objective TR 12 to specifically reference the need to provide permeability and connectivity in all housing developments. Suggested wording: "Facilitate the development of 2,087 residential units within the town boundary ensuring permeability between developments and connectivity to the urban core by active means" as recent social housing developments have been insufficiently connected to the town centre by sustainable infrastructure.	Objective TR 12 states "Facilitate the development of 2,087 residential units within the town boundary", it is not considered necessary to include additional wording in this objective as it primarily relates to residential growth figures. There are several other objectives within the Draft Plan which relate to permeability, connectivity, and sustainable infrastructure such as TR17, TR18, TR107 & TR108.
KE-C1-346 Kerry Green Party	The submission seeks amendment to Point 5 of Section 1.1.3 to read "Sustainably strengthen the settlement through investment in key infrastructure such as a network of high-quality, interconnected cycle paths, enhanced footpaths & walkways, bicycle parking and high-quality pedestrian measures at road junctions. Repurpose road space in the urban core for use for active travel modes and seek to locate car parking at the edges of the town to enable sustainable travel in the town for locals and visitors alike. For commuter and inter-county travel, the development of increased capacity for rail services, bus stops and bus priority will be supported" to promote active travel in the town.	It is not considered necessary to include the suggested wording amendments within Section 1.1.3 as other parts of Section 1.1 [including objectives] cover the points raised and therefore this would lead to repetition within this section of the plan.
KE-C1-346 Kerry Green Party	The submission seeks strengthening of Climate Action Objective TR17. Suggested wording: "Prioritise the regeneration of Tralee Town Centre as a	It is not considered necessary to include additional wording in Objective TR17 as it seeks to prioritise the regeneration of Tralee Town Centre which are accessible by

	compact town for residential, employment and services that are accessible by sustainable modes of transport including walking, cycling and public transport BY RE-PRIORITISING ROAD SPACE FROM MOTOR VEHICLES TO ACTIVE MODES, BUS LANES AND BUS STOPS.”	sustainable modes of transport including walking, cycling and public transport. This is reinforced by TR18 which seeks to ensure that ongoing and planned investment in public realm infrastructure, is given pedestrian priority, along with planned investment in active travel/cycleways aligns with and is integrated with the brownfield and R1 infill lands as designated in the plan. Objective TR112 further promotes sustainable modes of transport by seeking to liaise with NTA, Bus Eireann and private Bus companies to provide bus set-down areas, bus shelters and bicycle parking at strategic locations in the town centre area. Obj TR-98 and KCDP 14-10 which relate to Transport Mobility Plan for Tralee and KCDP 14-3 which outlines detailed county policy for smarter travel initiatives cover this area.
KE-C1-346 Kerry Green Party	The submission states that in section 1.4.1 Town Centre and Public Realm Strategy, the following statement would enhance the ability of the town to regain vibrancy. Following paragraph 6 when ends “...surrounding coastal landscape.” insert the following paragraph: “THE VIBRANCY OF THE TOWN CENTRE CAN BE ENHANCED FURTHER BY DIVERTING THROUGH MOTOR TRAFFIC AWAY FROM THE URBAN CORE. THE USE OF THE EASTERN BYPASS ROAD, NEW NORTHERN RELIEF ROAD AND INTERNAL LINK ROADS WILL BE USED TO MANAGE THROUGH TRAFFIC AWAY FROM THE TOWN CENTRE. SUCH MEASURES WOULD NOT IMPACT ACCESSIBILITY IN THE URBAN CORE FOR EMERGENCY VEHICLES, DISABLED PERSONS OR THOSE CHOOSING ACTIVE MODES.”	It is not considered necessary to include additional wording at the end of Section 1.4.1 as public realm improvements have been carried out in the town centre to date (supported by URD Funding & Active Travel) in to reduce vehicular activity within the urban core and there are several objectives within the Draft Plan which address the accessibility and permeability of the town centre such as Objective TR 97 which states “Facilitate, in a sustainable manner, the proposed traffic management measures, as contained in the Tralee Transport Strategy 2011” and Objective TR 98 which states “Develop a Transport and Mobility Plan in conjunction with all relevant stakeholders for Tralee Town” as well as Objectives TR 99 & TR 100 which relate to active travel.
KE-C1-188 Tralee Chamber Alliance	The Submission makes comments and suggestions as follows; -Regeneration of Pembroke Street, Edward Street, Castle Street and Boherbue must also be included in the Public Realm Strategy. -Advancement of connections to the ‘Tralee Ring-Road’ from Monavalley (Tralee Northern Relief Road from Forge Cross to Bracker O’Regan Road via R556 junction in Lisloose), and the creation of a critical exit back on to the	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 111 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. 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. The Draft Plan contains objectives relating to these roads infrastructure projects specifically Objective TR 110 which states “Facilitate the sustainable development of Northern Relief Road and Western Distributor Road and the upgrade of the Tralee to

<p>Tralee Ring Road from Clash, along with advancement of the Ballymullen to Clash Inner Relief Road would serve to improve both sites. Expansion of both locations to lands on the Bracker O'Regan Road and Ballybeggan Racetrack should be secondary to first maximising the potential from the existing industrial estates to create quality employment.</p> <p>-The Multi Storey car park on Edward Street and underground car park in Abbey Court should be re-opened to provide additional car parking spaces and reduce the requirement for on street car-parking. The multi-storey car park on Edward St. will also contribute to a balance in the provision of car-parking across the town.</p> <p>-The development of the Island of Geese as an Innovation District is welcomed but a timeline for this development is required.</p> <p>-The objective to expand the Kerry Technology Park and Business Innovation Centre for economic development and increased employment opportunities, should not be at the expense of town centre development of innovation zones and modern office facilities.</p> <p>-Town Centre should be prioritised for the development of modern office buildings of sufficient scale to encourage FDI and Indigenous Companies to locate to the town centre and create high quality employment. Locations identified for such developments include Island of Geese site and proposed regeneration areas on the John Joe Sheehy Road.</p> <p>-The development of the opportunity site at Fels Point on the Dan Spring Road as a conference and events centre and the development of the Ballymullen Roundabout site for modern office buildings should be linked with pedestrian access to the town centre.</p>	<p>Fenit road (R558)" and Objective TR 111 which states "Complete the Clash to Ballymullen link road".</p> <p>Tralee Town has a significant number of parking spaces available to the public at over 2200 spaces. The Local Authority already operates a 6 or 12 monthly parking payment system in Tralee, with public parking facilities further from the town core being less expensive. Any proposed changes to road traffic circulation and parking are always advertised inviting public consultation. As well as the Local Authority's statutory obligations in relation to advertising schemes, the Local Authority is increasingly using more on-line forms of communications (including MaaS). Kerry County Council has acquired the underground car park in Abbey Court and will reopen as soon as suitably upgraded.</p> <p>The development of the public realm space in the Island of Geese which is co-funded by the European Regional Development Fund's S&E Regional Operational Programme 2014-2022 Designated Urban Centres Grant Scheme, managed by the Southern Regional Assembly, and Kerry County Council is currently ongoing and it is expected to be completed this year. Kerry County Council is actively encouraging the development of the site as a contemporary, attractive and innovative urban district with planning approved for a high-end Grade A quality office accommodation appropriate to the vision for the regeneration of Tralee Town Centre. Opportunities are being sought for the sustainable development of the area which are aligned with the Masterplan and will meet the needs of Tralee Town Centre.</p> <p>Whilst it is acknowledged within the Draft Plan that the Kerry Technology Park plays an important economic and educational role within Tralee, the draft plan also contains objectives relating to the town centre in terms of its importance for retailing, employment, residential and recreational uses.</p> <p>A masterplan will be prepared for the John Joe Sheehy Road which is envisaged to encompass mixed use development including employment uses.</p> <p>There are objectives in the Draft Plan which support this statement and any future developments including Objective TR 108 which seeks to facilitate the enhancement of Tralee as a "10-minute town" and Objective TR 109 which seeks to facilitate improvement of existing footpaths and road network and support future projects for footpaths and roads with the provision of amenity areas at appropriate locations.</p>
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<p>KE-C1-44 Billy Nolan</p>	<p>This submission states that "Buildings in lower but mostly in Upper Castle St need grants to do them up for Business or Apartments and a plan if they do them up of alleviating rates for a certain length of time".</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 thereby contributing to a high standard of design. • supporting competitiveness and choice in the retail sector. • Contributing to the enhancement of the aesthetics and character for the overall betterment of the town through a collective and coherent approach. The Council is continually engaging with all stakeholders in order to enhance the public realm in line with the TTC Public Realm Strategy 2018 .</p>
<p>KE-C1-413 Hugh and Jean Campbell</p>	<p>The submission seeks an attractive and central location for a market in the town, instead of the current peripherally located market. The submission seeks clear aspirations for this within the plan and references the UK and Europe as good examples where this has been implemented.</p>	<p>The draft plan acknowledges and builds on the importance of towns as drivers for rural economic growth, and it sets out objectives and principles on placemaking for enterprise development. The Plan highlights that the Town Square facilitates everyday commuters, shoppers and visitors as well as events, gatherings, markets, stalls and festivals. The Local Authority will facilitate a transformative intervention in the Town Square which will serve to upgrade the historical town centre in conjunction with the creation of the new urban linear park in the island of Geese.</p>
<p>KE-C1-181 Avison Young (on behalf of Tesco Ireland Limited)</p>	<p>The submission seeks an amendment to Objective TR 46 to allow for the reinvestment and upgrading of Manor East and West where it does not alter its role and function with respect to Tralee Town Centre and the retail hierarchy.</p>	<p>Objective TR 46 states "Limit retail development in the Manor West and Manor East area (Map 1.9) to retail warehousing only as defined in the Guidelines for Planning Authorities, Retail Guidelines, DoECLG, 2012", and this does not disallow the reinvestment and upgrading of the existing retailing area. However, the Draft Plan seeks to promote the development of the town centre as the primary location for retail by seeking to protect the vitality and viability of town centres by ensuring that all significant retail & office developments, with the exception of neighbourhood shops are located in the town centre. There is a presumption in favour of town centre retail developments as opposed to out-of-town shopping centres and retail parks.</p>
<p>KE-C1-188 Tralee Chamber Alliance</p>	<p>The retail role in town centre is evolving, it is imperative that the County Development Plan revisits the retail control zone attributed to the town centre streets in Tralee, and as part of the overall strategy for Tralee town takes into consideration alternate office, community, culture and residential uses for vacated ground floor premises no longer fit for modern retail purposes.</p>	<p>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.</p>

	<p>The submission highlights the potential impact of out of town retail and the recent successful planning applications to expand same. In context this extra available space is just 20,000ft2 shy of the largest retail development in the Southwest Region (Mahon Point Retail in Cork).</p> <p>The further expansion of out-of-town retail development, while a welcome potential employer, will provide a greater challenge to town centre commercial activity and could if not addressed encourage people away from the town centre and into their cars which appears contradictory with the aims of the RSES and the NPF. Ensure that the town centre and Manor retail offering is supportive of each other, and acts as one single unit, an effective joint retail strategy is essential for Tralee that encourages people to both locations in Tralee town. The submission seeks development proposals for vacant retail units in Tralee Town Centre</p> <p>It is a policy of the Plan to identify sites in a poor state of repair or neglect under the Derelict Sites Act 1990. Derelict sites should be sympathetically renovated in keeping with the character of the area and should be finished in suitable materials.</p> <p>Enforcement orders should be acted on for owners of vacant and derelict properties in the town centre. Many properties on Denny St., Edward St, Rock St., Castle Street and Pembroke St. are vacant for many years and are not being maintained.</p> <p>The submission seeks a shuttle service between Manor Retail Park and the town centre</p>	<p>The expansion refers to solely retail warehouse space as defined by the Retail Planning Guidelines and the use of same shall be agreed with the council prior to first occupation.</p> <p>The Town Plan highlights a ‘retail core area’ and various policies and objectives to support the renewal and regeneration of this area are supported by the Planning Authority.</p> <p>The Planning Dept and the Economic Development Unit of the Council have been in discussion with the owners of the vacant properties and will continue to engage in the context of revitalising the town centre with regards to the possible redevelopment and upgrading of the premises.</p> <p>Shopfront design guidelines have been prepared by the Planning Authority which provide a valuable resource guide for property owners and businesses alike.</p> <p>It is a policy of the Council to identify sites in a poor state of repair or neglect under the Derelict Sites Act 1990 and appropriate enforcement action taken thereafter. It is preferable that these premises are developed and occupied rather than be allowed to remain vacant and prone to dereliction and vandalism. In view of this the Planning Authority will actively promote and facilitate the sustainable re-development and re-use of these structures and sites. The Town Plan actively promotes the development and employment potential vacant and derelict sites. Therefore, any development proposal received on this site will be considered on its merits subject to compliance with the policies and objectives of the Development Plan.</p> <p>The council will also liaise with Bus Eireann and private Bus companies to provide bus set-down areas, bus shelters and bicycle parking at strategic locations in the town and adjoining area and Objective TR 113 states “Promote the provision of a comprehensive local bus service within Tralee Town”.</p>
<p>KE-C1-44 billy Nolan</p>	<p>The tourist office should be relocated from the Ashe Memorial Hall to the town centre on a permanent basis.</p>	<p>While there are merits in having a tourist office close to town centre retail it is also important that immediate access to carparking is available. It is not considered appropriate to relocate the tourist office at this time. Kerry County Council is committed to improving connectivity with the construction of Cycle lanes, Wayfinding/ Green linkages, Safety School Access and promote Park and Stride through a necklace of carparks with strong pedestrian permeability and links to the town centre. Therefore, the location of the tourist office could be highlighted within the wayfinding proposal.</p>

<p>KE-C1-188 Tralee Chamber Alliance</p>	<p>Real opportunity to promote Tralee as a leading destination as a family friendly, multiactivity destination for short and long-term holidays.</p>	<p>The Plan recognises the role of tourism for Tralee Town and policies and objectives for its promotion are set out in Section 1.8. In addition, as with all policies the Tralee Plan must be read in conjunction with the wider County Development Plan Strategy. There are significant policies included in the plan with a commitment to support the implementation of the County Tourism Strategy/Cliff Coast DEDP which will provide a comprehensive policy for the tourism in North Kerry. The county tourism strategy will be reviewed in 2022 and this will allow for a further detailed analysis of tourism policy which will be supported by this plan.</p> <p>The Plan recognises the value and popularity of adventure tourism. Section 10.4.1 of Chapter 10 relates to Outdoor Adventure tourism in Kerry with specific Objectives KCDP 10-33 to 10-43.</p> <p>Objective TR 55 states “Strengthen and promote the relationship of Tralee Town as central to the Tralee Bay Area on the Wild Atlantic Way and facilitate where appropriate the development of projects listed in County Kerry Tourism and Action Plan 2016-2022”.</p>
<p>KE-C1-413 Hugh and Jean Campbell</p>	<p>The submission seeks stronger reference to heritage buildings within the plan, particularly three churches by Augustin Pugin, the Dominicans & St. Johns in Tralee and the Cathedral in Killarney as well as two buildings in Tralee, the courthouse and the gaol (currently occupied by Kelliher's Electrical Ballymullen).</p>	<p>These structures are listed on the Record of Protected Structures as it is acknowledged that they are key heritage buildings in Tralee Town. The plan recognises the importance of the protection of the built heritage. Objective KCDP 8-36 seeks the retention and appropriate repair and upgrading of historic buildings/structures within the town. In addition the implementation of the Destination Town objectives will provide the opportunity for greater visibility of the Tralee's build heritage.</p>
<p>KE-C1-413 Hugh and Jean Campbell</p>	<p>The submission seeks inclusion of construction and design aspects so as to accurately reflect the history of buildings and sustainable materials of high quality should be used. Full details of materials and finishes should be requested from applicants for shopfronts.</p>	<p>The Draft Plan recognizes the importance of appropriate design in redevelopment projects in order to protect and enhance to culture and heritage of historical buildings. In any grant of planning permission for such redevelopments a condition is attached to the permission in relation to materials and finishes to ensure their appropriateness.</p>
<p>KE-C1-44 Billy Nolan</p>	<p>Lack of proper parking to service Businesses and Apartments in Tralee. CPOs and extensions of existing car parks should be considered.</p>	<p>The provision of adequate car parking throughout the County is essential for the proper functioning of the town centres and access to services. It is important in the siting and design of new carparks, that every effort is made to maintain the quality of the public domain. However, the provision of car parking in Town centres needs to be balanced against obligations to reduce overall car dependency and reduce CO2 emissions in order to achieve Climate change targets. 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 charging points and improving parking infrastructure for key Tourism sites/routes. There are several objectives which promote active travel</p>

		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. There are also specific objectives for Tralee itself such as Objective TR 98 which states “Develop a Transport and Mobility Plan in conjunction with all relevant stakeholders for Tralee Town” and Objective TR 108 “Facilitate the enhancement of Tralee as a 10-minute town”. Objectives TR 99 to TR 107 relate to Active Travel and Greenways.
KE-C1-44 Billy Nolan	Improvements to footpaths (pavements) in Tralee town centre are needed	The Draft Plan contains Objective TR 109 which seeks to facilitate improvement of existing footpaths and...support future projects for footpaths. The council has ongoing programme for such works.
KE-C1-346 Kerry Green Party	The submission proposes that the Tralee Transport Strategy and Mobility Plan should be reviewed within a short timeframe as it is outdated and all proposed re-design of junctions and road layouts be assessed with current design principles in mind and an update to TR 97 should reflect same.	It is an objective of the plan to prepare a Transport and Mobility Plan in conjunction with all relevant stakeholders for Tralee Town, as set out in Objective TR 98.
KE-C1-346 Kerry Green Party	The submission seeks an amendment to this objective to develop a Transport and Mobility Plan in line with current best practice design standards including measures to trial experimental traffic designs, with public consultation and input from subject matter experts, the Kerry County Council Active Travel team and relevant state bodies. It also states that Tralee Transport Strategy 2011 is outdated.	Measures such as these can be considered during the preparation of the Transport and Mobility Plan.
KE-C1-346 Kerry Green Party	The submission seeks removal of wording from Paragraph 1 of Section 1.11.2 Active Travel, “not only facilitate leisure and recreational use but” as referencing recreation within active travel is inappropriate and does not align with modern thinking on the development of active travel modes.	It is considered that the submission does not give the full context of the text and that it is appropriate to retain the wording within Section 1.11.2 as active travel relates to all users from residents, to employees, students, tourists etc.
KE-C1-346 Kerry Green Party	The submission seeks strengthening of Objective TR 10 to specifically reference the need to re-prioritise road space to enable active travel. Suggested wording: “Improve inclusivity, accessibility, permeability, and connectivity throughout the town and where appropriate with the town to adjoining amenities for alternative more sustainable modes of transport, including cycling and walking by reprioritising road space from motor vehicles to active modes.”	The revision is not considered necessary as existing objective provides opportunities for refocusing transport to a more sustainable model
KE-C1-346 Kerry Green Party	The submission seeks an amendment to this objective to remove the word “more” in the opening sentence as at present, there is no usable network of cycle infrastructure in the town.	The contents of the submission are noted however it is considered that there are cycle lanes currently in place in and around the town and therefore it would be inappropriate to remove the word “more” from Objective TR 99.
KE-C1-346 Kerry Green Party	The submission seeks an amendment to this objective to indicate that the route should provide connectivity for residential areas along the route. The following wording should be inserted: “The cycle path should ensure residential areas abutting the route have high quality, accessible access to the route”, as such a linkage is required to connect MTU to Blennerville, but it must also include residential areas along the route.	Objective TR 102 seeks to complete the sustainable development of the 6km cycle path from Forge Cross to Blennerville Village, linking the Munster Technological University, Tralee to Blennerville via the Town Centre (as per Tralee Active Travel Plan). It is not considered necessary to include additional wording in this objective as there is another Objective which relates to connecting cycle infrastructure to residential developments – Objective TR 107 states “Connect existing and future residential developments to completed and planned greenways”.

KE-C1-346 Kerry Green Party	The submission seeks an amendment to this objective to include reference to cycle infrastructure as well as greenways by inserting: “cycling infrastructure and cycle ways” at the end of the existing sentence.	The plan seeks to improve connectivity throughout the town by connecting/joining up existing and proposed cycle/walkways. Recommendation: It is considered acceptable to amend TR107 with the addition of “cycling infrastructure and cycle ways” at the end of the existing sentence.
KE-C1-346 Kerry Green Party	The submission seeks an amendment to this objective to remove the word “sustainable”, as road development is not sustainable.	Objective TR110 states “Facilitate the sustainable development of Northern Relief Road and Western Distributor Road and the upgrade of the Tralee to Fenit road (R558)”, the reference to sustainable relates to implementing cycling lanes, footpaths, crossings within the proposed roads infrastructure. It is also considered that the construction of these routes will reduce congestion in the town centre and surrounding predominately residential areas, and in doing so will increase the vibrancy and vitality of these areas making the town centre a far more attractive and sustainable place to live.
KE-C1-137 Liam Geary	The submission seeks that navigation around Tralee Town is made more user friendly for locals and tourists.	Kerry County Council is committed to improving connectivity with the construction of Cycle lanes, Wayfinding/ Green linkages, Safety School Access and promote Park and Stride through a necklace of car parks with strong pedestrian permeability and links to the town centre. The implementation of the Destination Town objectives will provide clearer navigation tools and wayfinding for both tourists and the local community.
KE-C1-484 Tulfarris CG Ltd	This submission requests that the proposed and detailed 'draft integrated framework masterplan' is included as a new urban quarter opportunity site at Cloon More, Tralee.	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. The Planning Authority seeks to ensure that all developments are carried out in a sustainable manner and comply with the ‘Sustainable Residential Development in Urban Areas Guidelines’. The appropriate density for applications for housing developments will be determined by and 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 are to 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 Plan for Tralee does not limit the consideration of higher densities to certain areas such as opportunity sites. Therefore, it is not considered necessary to specify specific locations outside of the town centre where higher densities may be suitable as doing so may exclude some suitable areas. The R2 existing Residential zoning on this site is flexible enough to cater for a development with increased densities that provide for a mix of unit types to meet the needs of the changing demographic trends and household profiles in the town. The existing policies and objectives proposed are

		considered sufficient. The planning authority will also ensure that residential densities reflect the density of appropriate adjoining developments.
<p>KE-C1-188 Tralee Chamber Alliance</p>	<p>The new County Development Plan must be underpinned by a commitment to investment in the inter-county infrastructure within the remit of the county council and the publication of new Active Travel and Town Mobility plans providing for greater internal connectivity within Tralee and connecting peripheral areas to the town. Particularly focused on sustainable mobility, the keys to which are public transport and active travel.</p> <p>Specifically, it must support delivery of strategic sustainable transport projects including an expansive urban electric public bus for the Tralee area and associated infrastructure, that integrates the MTU, Manor West and the suburbs of Tralee to the town centre and integrates further with a public bus service for neighbouring towns and villages.</p> <p>Leveraging off existing and planned greenways to extend the safe passageway for cyclists and walkers will make Kerry towns more enticing to visitors and encourage active and sustainable tourism. Active travel should be supported across Tralee. This will require further investment in cycling infrastructure and improvement of the public realm to support pedestrians, that interconnects and compliments the greenway infrastructure around the town.</p> <p>Tralee is a key component of the regional economy and performs an important role in the county. The new Development Plan must build on this by creating the right conditions for the creation of quality jobs in the right locations. Compact growth involves locating employment hubs in close proximity to high density residential areas, thereby eliminating or reducing the need to commute. Public transport should also be considered in this context, with employment zones located close to key transport hubs.</p>	<p>Given that the Draft Plan has been prepared during the current climate crisis a key facet of the plan is climate action. 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. There are also specific objectives for Tralee itself such as Objective TR 98 which states “Develop a Transport and Mobility Plan in conjunction with all relevant stakeholders for Tralee Town” and Objective TR 108 “Facilitate the enhancement of Tralee as a 10-minute town”. Objectives TR 99 to TR 107 relate to Active Travel and Greenways.</p> <p>The Council will continue to liaise with NTA, Bus Eireann and private Bus companies to provide bus set-down areas, bus shelters and bicycle parking at strategic locations within the town centre area with linkages to the MTU and nearby settlements” and (Objective TR 112 & 3). It is also an objective KCDP 14-7 to promote and support the provision of new technologies on decarbonising transport which include public transport.</p> <p>The Draft Plan contains several objectives which relate to Active Travel and Greenways such as Objectives TR 99 to TR 107 which aim to connect the town to greenways and to create a green infrastructure.</p> <p>Compact growth and incorporating higher densities, where appropriate, as well as the provision of sustainable infrastructure are key features of the Plan. An effective and multi-modal transport system is reliant on the successful integration with land use planning.</p> <p>Objective TR 113 relates to the provision of a comprehensive local bus service.</p>

	Regular high quality bus access linking manor west retail park to Tralee Town Centre, MTU and Kerry Technology Park to Tralee Town Centre. 'Shuttle services to Tralee Bay activity locations (Fenit, Maharees, Banna) should also be introduced during summer months.	
KE-C1-44 Billy Nolan	Increased connectivity with Manor Shopping Centre is required.	The plan facilitates increased connectivity throughout the town especially using sustainable methods. The council will continue to liaise with NTA, Bus Eireann and private Bus companies to provide bus set-down areas, bus shelters and bicycle parking at strategic locations while promoting the provision of a comprehensive local bus service within Tralee Town (see obj TTR112-113).

Recommendations

Insert new text into Section 1.4.2 of Volume 2, Tralee.

“ There is significant potential for increasing the population of the town core through the reuse of vacant and derelict properties and through maximising the use of upper floors in town centre properties. This plan supports the development of residential properties in Tralee Town Centre both for social and private housing developments, for families and individuals and for student residential developments.”

Amend OBJ TR 52 to read: Support and promote the future development of the Munster Technological University and Kerry ETB’s Higher Education Facilities in Tralee, including the establishment and strengthening of their Town Centre presence.

Amend OBJ TR 53 to read: Support higher and further education and training investment, research investment and collaborations with both public and private enterprises

New Objective TR 68A Facilitate and support the delivery of projects that will be identified in the Cliff Coast DEDP.

It is considered acceptable to amend TR107 with the addition of “cycling infrastructure and cycle ways” at the end of the existing sentence.

Volume 2 – Town Development Plans – Tralee - Land use Zoning and Flood Maps		
	Submission Summaries	CE Response and Recommendations
KE-C1-60 Ita O Donnell	This submission requests that a buffer zone along the North Side of the Canal Bank (including the 2 swan ponds) is retained and also that the area is retained as a special amenity area. SPA, SAC	These lands are zoned Green/recreation/conservation in the draft town plan. This area is at risk of coastal and fluvial flooding. Some of this area is also designated SPA, SAC and NHA. The landscape, public open space and the canal walk are a combination of natural and man-made features and are enjoyed by people of the town and visitors alike. The Council recognises the importance of these features and will strive to protect and enhance the landscape and physical beauty of the area
KE-C1-86 Woodlands Caravan Park	The submission states that the owners of the site are opposed to the proposed road which would split the land in half, prevent future expansion of the business, create noise pollution and have an ecological impact with the cutting down of trees.	The proposed route alignment of this road is indicative only and its final route will be determined upon further detailed assessment and consultation at detailed design stage.

		The Planning Authority is required to set out their proposals to indicate their intention in terms of any plans for the long-term future sustainable development of lands in the vicinity of the Woodlands Caravan Park. The indicative roads were originally included in the current Tralee Town Development Plan 2009-2015, as extended.
KE-C1-269 QDM Architecture	The submission seeks the re-zoning of lands at Mounthawk currently zoned S1 (Educational Use) to R1 (Residential Use).	<p>It is the policy of the council to ensure that adequate lands and services are zoned and reserved in appropriate locations to cater for the establishment, improvement, or expansion of primary and post-primary educational facilities in the County.</p> <p>Notwithstanding the submission from the Dept. of Education (KE-C1-383) where it states at post-primary level, that it is anticipated that the level of additional potential requirements arising from the projected population increase can be met at the existing facilities, It is also an objective KCDP 6-42 to facilitate where possible, that proposals for future developments are located as close as possible, to community facilities such as sports facilities, libraries etc. so that these can be shared between the school and the community, hence the proposed designation (change to S5) .</p> <p>It is considered inappropriate to zone this site for residential use due to its peripheral edge of town location, there is more suitably located lands closer to the town centre that are zoned and could be zoned for residential development.</p>
KE-C1-201 Diane Crean	The submission supports the zoning of the land as R1 'New/ Proposed Residential' as per previous Development Plan. The submission is also supportive of the indicative road providing access from the subject lands to Killeen Road, adjacent to Na Gaeil GAA grounds. The submission seeks to reach final agreement with Kerry County Council on the River Walk amenity as soon as possible.	The Local Authority engages with all landowners and stakeholders in order to deliver upon the proposed development of land and projects, particularly through the pre-planning process.
KE-C1-104 Dromjam Limited	the submission requests the rezoning of land at Camp ,Ballyseedy,Tralee for the purposes of residential development . The submission states that this is to complete an unfinished housing estate on lands that where previously deemed suitable for residential development by the council by way of material alteration to the Tralee municipal district plan, as per the documents attached with their submission.	It is not proposed to zone additional lands at this location given that they are spatially removed from the town centre and do not adhere to the sequential zoning of lands. There are un-zoned lands closer to the town centre than those subject to the submission.
KE-C1-126 MWP	The submission requests that two sites in Clogher be zoned for residential purposes	The zoning of these lands located on the southern peripheral edge of the town would not comply with the sequential approach to land zoning and would also exceed the housing land requirement of the Core Strategy.
KE-C1-371 Ruden Homes Ltd.	The submission seeks the rezoning of lands at Mounthawk, Tralee from P1 Agriculture to residential zoning.	In the preparation of the Draft Plan and associated Tralee Town Plan all the sites to be zoned R1 'proposed' residential were assessed using a number of criteria:

		<ul style="list-style-type: none"> •The sequential approach; the lands are located some 1.3km from the town centre (Rock St). it is considered that there are more suitable lands closer to the town centre that have potential to be developed for residential use. • Lands were changed to amenity and open space and other uses by variation no. 5 (2018) and these zonings have been put forward here again Some lands that are located within close proximity to the town centre have not been zoned for residential use as they have been identified as at risk to flooding or considerable archaeological potential exists on these lands <p>Compliance with core strategy; the main tenet of the core strategy is the compliance with the land requirement/housing target as set out in table 3.7. It is imperative that the land requirement standards are not exceeded. It is therefore considered contrary to the proper planning and development of the area to zone these lands for R1 proposed residential.</p>
<p>KE-C1-112 PSA Sugrue</p>	<p>This submission requests the reinstatement of the former residential landuse zoning on part of the remaining landholding of PSA Sugure Ltd. at Ballyvelly, Tralee adjacent to the existing Cois Laoi estate.</p> <p>It is submitted that the portion of lands formerly permitted for 52 no. housing units, is proven by the enclosed flood risk review to not be at risk of flooding and therefore merits reinstatement as a residential development site that is preferable to other lands, it being more proximate to the town centre and already serviced i.e. sequentially this site is preferable over lands further away and not serviced. In addition, it is submitted that the reinstatement of the residential development objective of the lands will allow for the completion of Cois Laoi in the manner that was originally envisaged and will benefit the appearance and legibility of the town on this important approach that is visible from the N86 road.</p>	<p>The Draft plan seeks to develop Tralee as a climate resilient, environmentally sustainable town and in doing so providing for adequate residential units at appropriate locations. It is a strategic aim of the plan to zone lands for residential use in a sustainable manner at appropriate locations.</p> <p>A Strategic Flood Risk Assessment has been carried out on the Draft Plan and has informed the land use zonings. Flood Maps indicating those areas in Tralee that are risk of flooding are included in Section 1.12. These lands in Ballyvelly have been identified at risk of flooding under the CFRAM study. Consequently, the lands were zoned for Amenity / Recreation under Variation No. 3 & 5 to Tralee Town Development Plan (2016 & 2018). The submission states that these lands have been partially filled. The filling of lands is not an acceptable flood mitigation measure in isolation. The filling of lands may have consequences for lands outside a subject site due to flood plain loss and / or flood flow displacement to other locations.</p> <p>In addition, the CFRAM Mid and High Range Future Scenarios model the increased flood risk associated with climate change and rising sea levels. Notwithstanding the partial filling of the site, under these scenarios the entire site is at risk of flooding.</p>

		<p>This puts the lands in Flood Zone A in accordance with the Department Guidelines, The Planning System and Flood Risk Management. The department guidelines outline the planning implications for Flood Zone A:</p> <p><i>Most types of development would be considered inappropriate in this zone including highly vulnerable development, such as hospitals, residential care homes, Garda, fire, and ambulance stations, dwelling houses and primary strategic transport and utilities infrastructure. Development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere, and where the Justification Test has been applied. Only water-compatible development, such as docks and marinas, dockside activities that require a waterside location, amenity open space, outdoor sports and recreation, would be considered appropriate in this zone.</i></p> <p>Therefore, in accordance with these guidelines residential development should not be permitted upon these lands. There are other sites in Tralee that are not considered at risk to flooding which are considered suitable for residential use. It is therefore considered necessary to zone these land G5 Green/recreation/conservation.</p> <p>TR 24 Protect the town’s existing floodplains and wetlands from inappropriate development in recognition of their function as attenuators and conveyors of flood water.</p>
KE-C1-32 Bertie Foran	The submission seeks mixed use zoning of lands in the authors ownership for split purposes, partially for the further development of facilities of MTU adjacent to the site and partially for residential purposes	These lands are spatially removed from the town centre and do not comply with the sequential zoning of lands required to be adopted in the preparation of development plans
KE-C1-34 Gerard griffin	This submission requests that the lands outlined on the attached maps at Rathass Tralee, are all zoned residential. The developer has developed housing on adjacent sites at Clashlehane Meadows and Lee Drive and has built a new bridge to access Clashlehane meadows.	These lands are spatially removed from the town centre and do not comply with the sequential zoning of lands required to be adopted in the preparation of development plans. The additional zone of lands in Tralee would be in excess of the core strategy allocation
<p>Recommendations</p> <p>No proposed amendments.</p>		

Volume 2 – Town Development Plans - Killarney		
	Submission Summaries	CE Response and Recommendations
KE-C1-346 Kerry Green Party	The 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.
KE-C1-187 mary mahony	The submission gives several references which state that even during Covid-19 air quality in Killarney improved less because of the burning of solid fuels. It further states that Killarney has average PM2.5 concentrations which can worsen asthma and chronic obstructive pulmonary disease, cause heart attacks, strokes and even death. The submission requests that an air monitoring station in Killarney Town so alerts can be sent out to vulnerable citizens when air quality is poor.	
KE-C1-122 mary mahony	It is very important to ensure that objective KA 21 is achieved since there are bats that are very sensitive to light pollution and will avoid brightly lit areas. See 'Guidelines for consideration of bats in lighting projects'.	The contents of the submission are noted. Section 1.14.2 Lighting and illumination of Volume 6 Development Management Standards sets out specific details in relation to the provision of lighting including: Prevent light trespass • Minimise sky glow • Choose light fixtures to allow for aesthetic considerations • Maximise energy efficiency • Take cognisance of protected species, where applicable.
KE-C1-123 mary mahony	The submission recommends the following "In addition to what is stated in objective KA 25, KCC should investigate opportunities to extend foraging areas and increase linear features such as hedgerows, treelines and stone walls in the Town so as to seamlessly join the green spaces of the Park into the urban experience and other green spaces in the Town as bats follows commuting routes from its roost to its foraging grounds and will not cross open ground."	Objective KA 25 states "Ensure that there is no significant decline in the extent of potential foraging habitat or significant loss of linear features / commuting routes associated with Lesser Horseshoe Bat Roosts named in the Conservation Objective Report for the Killarney National Park, MacGillycuddy's Reeks and Creagh River Catchment SAC (Oct 2017)". The submission seeks that the Local Authority investigate opportunities for foraging areas and linear hedgerows, treelines etc. It is considered that this is covered by Objective KA 26 which states "Protect non designated habitats and species, local biodiversity features and to maintain and enhance ecological corridors and natural features of the landscape such as hedgerows, trees, rivers, lakes, parklands, ponds and roadside verges".
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional Objective which would state "Retrofit council-owned buildings and conduct awareness campaigns to provide information to residents regarding the benefits of retrofitting, how retrofitting works, the types of retrofits appropriate for different types and ages of homes, and how to apply for grants etc", as it is a key action of the 2021 Climate Action Plan.	The National Standards Authority of Ireland have a code of practice in relation to the retrofitting of buildings. It is considered that the Local Authority could be more proactive in providing information and guidance to the public. The SEAI have a dedicated section of their website which provides everything you need to know about applying for a home energy grant. It is an objective (2-23) to promote energy conservation, energy efficiency including retro fitting of energy efficiency measures in the

		existing building stock, energy efficiency in traditional buildings and initiatives to achieve Nearly Zero-Energy Buildings (NZEB) standards For the last decade Kerry County Council has worked with the SEAI through a number of grants supports schemes to implement energy reduction and climate change mitigation projects. These projects have included the retrofitting council-owned buildings with insulation and upgrade heating system and conducting awareness campaigns with the wider public
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional Objective which would state “Encourage and support food-sellers to reduce food waste by utilizing apps such as ‘Too Good to Go’ or by coordinating between food-sellers and charities, and to reduce packaging waste through offering food refill options (such as in Beech Road’s ‘Going Green’ shop)”, given that food waste is contributor to climate change, due the greenhouse gases that are unnecessarily emitted when producing the wasted foods	The submission is noted. Chapter 2 outlines climate policy in the CDP while Chapter 13 addresses waste management. Objective KCP 2-9 specifically supports the circular economy including better resource management and sustainable supply chains. This implies the CDP already supports a reduction in GHG emissions within food production. This and other objectives in this chapter, including support for agri-climate policy, is deemed satisfactory as ultimately the CDP is a land use plan and emissions from food production/packaging falls outside its scope. Objectives KCDP 13-38 and 13-39 support the concepts of sustainable patterns of consumption and production at a community level within the circular economy. However, it is noted that specific mention is not made to food waste within the waste chapter. Further to the submission it is considered appropriate to amend Chapter 13 by adding new text and an objective as follows. <u>Recommended Amendment:</u> After 13.3.3 last sentence add: The Council supports the use of smart technologies and innovative approaches to waste management which promotes waste prevention and increased reuse, recycling and recovery of waste, with additional environmental and economic benefits. The Council will promote and implement new measures and practices to develop the circular economy at county level. This will include support for measures that are seeking to reduce food waste and food packaging. Innovative community/business lead initiatives such as co-ordinating food supply with local charities in need, will be supported. New objective KCDP 13-XX “Work with all stakeholders to encourage measures and initiatives that seek to reduce food packaging and food waste”.
KE-C1-124 mary mahony	The submission recommends that the draft county development plan provide support for Non drink related alternative entertainment venues in Killarney	The Council in collaboration with all relevant stakeholders will promote and facilitate a mix of compatible uses that will contribute to an enhanced provision of a range of entertainment uses (leisure, arts, craft, culture and

		<p>recreational) including a mix of day/night-time uses and casual/on street uses. The sale/consumption of drink is not an issue for the CDP.</p> <p>A revision included in the Sustainable Communities Chapter of the CDP sets out the following. This policy is a countywide policy.</p> <p>The Council will encourage and facilitate with key stakeholders and community groups diverse evening/nightlife activities that are suitable for all ages including young people.</p> <p>Objective Encourage the development of diverse evening/nightlife activities that focus on youth participation and facilities</p> <p>It is considered that this policy framework is sufficient to cover the sentiments of the submission</p>
<p>KE-C1-398 Irene Hartigan</p>	<p>The submission states the importance of community collective efforts and that fundamental principles are required so members of the community take responsibility for their environment. The submission seeks the implementation of a community police force, additional pedestrian crossings, smarter travel initiatives, new and improved street lighting, address traffic and parking, encourage sustainable travel, more play spaces, more litter bins. The submission states that European models provide good examples such as Chamonix and Canmore. The Canmore Recreation Masterplan is attached to the submission.</p>	<p>The council recognises that the management of all public spaces and built form areas will have a positive effect on the vitality and vibrancy of our town centres resulting in sustainable and safe recreational spaces.</p> <p>KA 73 commits to developing a Transport and Mobility Plan for Killarney Town. This is an important instrument in the development of smarter travel options in Killarney. The URDF submission and overall vision for Killarney seeks to include improved pedestrian and cycling mobility throughout the town. Obj KA 74 , 75, 76 add further policy in this area.</p> <p>KA 66 – KA71 detail the objectives for recreation, amenity and open space and these are supported by the policies contained in chapters 4, 6, 10 and 14 of CDP.</p> <p>This plan aims to harness and maximise new funding streams to improve the quality of all Kerry's Towns and Villages by applying the principles of placemaking, by providing accessible, safe, and distinct built environments that reflect the unique character, heritage and identity of each settlement supported by the creation of safe and attractive public places.</p>
<p>KE-C1-346 Kerry Green Party</p>	<p>The submission seeks the inclusion of an additional Objective which would state "Provide outdoor covered seating facilities in the town centre (for example, in the 'car park' area between High Street, New Market Lane, Bohereencael Glebe, and Old Market Lane Square – see the proposal below in the Opportunity Sites section) similar to what has been set up at Prince Street in Cork City, not only for the purpose of outdoor dining but also to provide</p>	<p>The Local Authority encourages and facilitates outdoor seating areas where such spaces will not impact negatively on the amenities of the area including the provision of adequate and safe passageways for pedestrians, with particular regard to those with disabilities. The Council has agreed at</p>

	a place for residents and visitors to sit outside in shelter to socialize, all the while enhancing the atmosphere of the town”, as more facilities are required within the town.	<p>municipal District level a number of locations for the provision of public realm improvements including seating facilities.</p> <p>New Objective KA xxx Facilitate and support the development of outdoor seating infrastructure at appropriate locations to support outdoor dining and to enhance the vibrancy of the town centre</p>
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of additional opportunity sites, with one at High Street, New Market Ln, Bohereencael Glebe, Old Market Ln square which is 0.25 acres and it states that the car park should be replaced with covered outdoor seating area available to customers of nearby restaurants, cafes, and general visitors, or as suggested elsewhere in the plan, a ‘craft quarter.’ It states that the old Sara Lee site should be also included and could include the building of social housing, development of a remote working hub, or provisioning to MTU.	<p>The Sara Lee site is zoned M5 in the proposed. This zoning permits a wide variety of use.</p> <p>The development of this area around Bohereencael Glebe, Milk Market Lane and Old Market Lane is necessary and will be reimagined, with the concept of a craft/market area in line with its history, supported by the highest quality of public realm, which, through the use of materials and design will again reinforce the heritage and history of the area. This will further enhance and extend the “Authentic” Killarney Offer.</p> <p>It is also the policy of the plan to facilitate outdoor dining proposals pursuant to a licence under section 254 of the Planning & Development Act 2000 (as amended) in suitable areas of the public realm including footpaths and roads subject to pedestrian and vehicular safety and maintaining adequate car parking to serve the settlement.</p>
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional Objective which would state “Facilitate the revitalization of the Outlet Centre, and additional use of the upstairs space” as it is currently underutilized.	An objective of the Draft Plan [KCDP 4-43] is to prepare a Retail Strategy for the County which will include the Outlet Centre in Killarney. The Council is committed to ensuring the town centre area remains, commercially viable, active and buoyant.
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional Objective which would state “Facilitate and support local food markets and offerings such as the NeighbourFood Killarney Market and the Killarney Fruit and Veg Market in Fairhill car park”, as there is growing demand for this.	<p>It is understood that a market currently operates in Killarney and that this is growing organically within the town. It is also Council policy to promote organic producers and producer-only products through supporting ‘Farmer Markets’ and to promote seasonal and craft markets throughout the county. It is Council policy to designate sites as Casual Trading Areas in suitable locations where they are deemed appropriate. In the implementation of this policy the Council will have regard to the terms of the Casual Trading Act 1995.</p> <p>This is also supported by the general policy in Chapter 4, Towns & Villages KCDP 4-41 Promote organic producers, craft makers and producer-only products through “Farmers Markets” at appropriate town and village centres throughout the county.</p>

KE-C1-172 Paul Mc Sweeney	The 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.
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional Objective which would state “Ensure that the biodiversity and the temperate rainforest ecosystem of Killarney National Park, as a UNESCO Biosphere Reserve and as part of both a Special Area of Conservation and a Special Protected Area, are conserved and enhanced”, 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.	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”.
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional Objective in Section 2.3.4 which would state “For every tree in the Killarney area that is removed by the council, at least ten native trees must be planted as replacements”, due to the benefits for both the health of communities, the atmosphere of a locale, biodiversity, and climate action.	It is the intention of the council to prepare a Tree Management Plan for each Municipal District in the county. It is also the policy of the Council to promote enhanced biodiversity within the town and the creation of green ecological corridors.
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional Objective which would state “On lands owned by the council, grass should be cut infrequently to increase biodiversity and to show leadership in taking steps, however small, in tackling the biodiversity crisis”, whilst KA29 refers to working with stakeholders regarding grassland management, it is important to include an explicit policy point regarding the council own actions regarding council-owned land.	It is proposed to add this additional text to the plan. As the proposal has countywide implications it is recommended that this text be included in chapter 11, in section 11.2.5 <i>“ As part of the councils commitment to biodiversity and Climate Change , Kerry County Council is seeking to return more open grassed areas such as grass verges along roads , sections of public parks , appropriate areas in graveyards etc . to natural biodiversity areas to encourage natural wildflowers to recolonise and support enhanced bee and insect populations. This will be achieved through a reduction in the amount of seasonal mowing and the establishment and restoration of rewilded areas. “</i> Additional obj KCDP 11-17A Support the management of appropriate green areas to become natural biodiversity areas to encourage natural wildflowers to recolonise and support enhanced bee and insect populations
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional Objective which would state “Advocate for the return of the Annals of Innisfallen to Ireland, preferably to Killarney or a least Kerry, to provide an additional tourism attraction to the town, to enhance the experience of those seeing the Annals, and to highlight the historical and cultural	Irrespective of the merits of this proposal it is considered that it is not appropriate objective for a land use plan.

	significance of Innisfallen Abbey”, given that it is an incredibly significant text that chronicles the medieval history of Ireland.	
KE-C1-346 Kerry Green Party	<p>The submission seeks the inclusion of an additional Objective which would state “Cycling infrastructure should be sufficiently protected and designs should accord with the latest cycling infrastructure design standards”, as quality of cycle lanes is key to active travel.</p> <p>The submission seeks the inclusion of an additional Objective which would state “Develop protected cycling infrastructure within a least a kilometre of all schools within the Killarney region to encourage active travel school journeys.”</p> <p>The submission seeks the inclusion of an additional Objective which would state “Provision increased numbers of bike racks throughout the town to encourage active travel”, as there are insufficient bike racks at present and are required to assist transitioning to a low-carbon society.</p>	Objectives KA 74 – KA 76 and KA 81 relate to the provision and promotion of cycling infrastructure in Killarney. Objective KA 81 relates to the provision of bicycle parking. It is considered that the points raised also relate to Chapter 14 Connectivity and in this regard Objectives KCDP 14-1, 14-3, 14-9 and in particular 14-11 states “Develop in accordance with the National Cycle Manual and the NTA, an integrated network of cycle ways in our larger urban centres, to ensure permeability within and between residential areas, linking to town centres, schools and places of work informed by Transport Mobility Plans for Tralee, Killarney and Listowel”. KA 74 covers this element of the submission Develop and promote a more cycle and pedestrian friendly network and ancillary infrastructure throughout Killarney.
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional Objective which would state “Implement higher parking fees for SUVs due to the additional space they take up and the additional air pollution attributable to them.”	As set out in the Development Management Guidelines within Volume 6, the dimensions for a standard parking space are 5.0m x 2.5m, therefore there is no requirement for larger spaces for SUVs. Car parking rates relate to the occupation of a space and do not relate to the type of vehicle.
KE-C1-346 Kerry Green Party	The submission seeks the inclusion of an additional Objective which would state “Not to undertake the building of new roads to alleviate traffic due to the risk that new roads will increase instead of decrease private vehicle traffic volume overall due to a more attractive road infrastructure. Improved active travel infrastructure should be provided instead.”	The plan supports and promotes sustainable infrastructure and active travel. It is considered that the overall transport policy of the CDP including the town plans offers significant opportunities to reduce car usage in our urban centres. In this context the consideration of additional roads can reduce the need to through urban centres and accordingly, create more cycling, pedestrian friendly zones.

Recommendations

After 13.3.3 last sentence add:

The Council supports the use of smart technologies and innovative approaches to waste management which promotes waste prevention and increased reuse, recycling and recovery of waste, with additional environmental and economic benefits. The Council will promote and implement new measures and practices to develop the circular economy at county level. This will include support for measures that are seeking to reduce food waste and food packaging. Innovative community/business lead initiatives such as co-ordinating food supply with local charities in need, will be supported.

New objective; “Work with all stakeholders to encourage measures and initiatives that seek to reduce food packaging and food waste”.

New objective; Facilitate and support the development of outdoor seating infrastructure at appropriate locations to support outdoor dining and to enhance the vibrancy of the town centre

Add text to Section 11.2.5 “ As part of the councils commitment to biodiversity and Climate Change , Kerry County Council is seeking to return more open grassed areas such as grass verges along roads , sections of public parks , appropriate areas in graveyards etc . to natural biodiversity areas to encourage natural wildflowers to recolonise and support enhanced bee and insect populations. This will be achieved through a reduction in the amount of seasonal mowing and the establishment and restoration of rewilded areas. “

New Objective KCDP 11-17A: Support the management of appropriate green areas to become natural biodiversity areas to encourage natural wildflowers to recolonise and support enhanced bee and insect populations.

Volume 2 – Town Development Plans – Killarney - Land Use Zoning		
	Submission Summaries	CE Response and Recommendations
KE-C1-17 Donal O'Donoghue	The submission seeks rezoning of land in Killarney from R2 Existing Residential to C5 Tourism. The zoning designation for the Gleneagle campus (currently under the control of the O'Donoghue family) is C5 Tourism and related uses. There are two properties, owned by the O'Donoghue Family, that are zoned R2 Existing residential and located directly adjacent to the Gleneagle Hotel campus and the submission seeks the rezoning of these properties to C5 Tourism.	It is considered that the R2 Existing Residential designation is appropriate for these properties. The planning history on these sites indicates that these are dwelling houses. Notwithstanding the use of one of the properties as a B&B (where planning exemptions apply up to 3 rooms) it is considered that a C5 zoning would result in loss of residential accommodation within a rent pressure zone where there is a strong need for residential units.
KE-C1-225 Portal Asset Holdings Ltd.	This submission notes that the zoning of a site on Port Road in Killarney has been changed from R1 Proposed Residential to S3 Community. The submission seeks that the zoning of the land is reverted to R1 Residential zoning.	It is considered appropriate to revert to the R1 Residential zoning. The inclusion of this site as S3 Community was a mapping error in the preparation of the Draft Plan, it is therefore appropriate to maintain the existing zoning in the current Town Plan as R1 residential as is the intention with all other zonings at town plan level. Recommendation: <i>It is recommended that an R1 zoning is outlined in the amended Plan for this site.</i>
KE-C1-129 Peter Murphy	The submission requests as per the attachment submitted as part of this submission to rezone lands for residential purposes at Mill Road Killarney	The zoning of these additional lands on Mill Road, Killarney would contravene the Core Strategy as it would exceed the amount of land required to cater for the housing target. In addition, these lands by virtue of their peripheral location on the edge of the town would not comply with the sequential approach to land use zoning. Furthermore, the surrounding road network of Mill Road is considered substandard in parts in terms of width and alignment. This taken together with the absence of pedestrian facilities serving the area and the challenges to provide these facilities on Mill Road, means that it is not considered sustainable or appropriate to zone additional lands for proposed residential use, at this time.
KE-C1-354 Chantal Shiels	This submission seeks the rezoning of land at Mill Road Killarney from G3 Conservation, Amenity and Landscape Protection to Residential use.	The site is zoned G3 landscape protection, as it is a wooded area adjacent to the River Flesk. The site is a designated Proposed Natural Heritage Areas (Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment) and is also contiguous to Fluvial flood risk area. It is an objective (11-2) to Maintain the nature conservation value and integrity of Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) and (KA30) to ensure the protection of existing trees and it is policy to protect and enhance the natural heritage of the area. The proposed redesignation of this site for residential development would seriously injure the visual amenities in this visually sensitive area.

KE-C1-412 J & Patrice Houlihan and Mengen	The lands at Killarney Racecourse, zoned G4 in relation to the use for camping/glamping etc. should be changed from Open to consideration to Not normally permitted.	This is considered to be an appropriate location for camping/glamping given the site context. However it should be noted that any development proposal will be subject to normal planning considerations during the planning permission and may be subject to conditions.
KE-C1-415 Gerry Coakley	This submission supports the zoning G1 Open Space/Park - The Demesne, Ross Road, Killarney.	Noted.
KE-C1-394 Michael O Sullivan	The submission states that the indicative road is not an effective solution given the serious and significant environmental impact it would have, most especially in the section that crosses the Flesk river, and potential flood risk. The submission objects to the passing of this road so close to their property and principle primary residence. Further states that the draft plan fails to provide any alternative routes for consultation. In line with Section 51 of the Roads Act 1993 and the EIA (Amendment) Regulations (S.I. 93 of 1999) alternative routes are required in any proposal.	The location of this proposed road is indicative only. It is acknowledged that a crossing of the Flesk River would require considerable environmental assessment. As a recognition of the potential sensitives surrounding this proposed crossing, the project requires that a feasibility study be carried out on the proposed River Flesk crossing and its potential for impact on Natura 2000 sites will be taken into consideration and 'where adverse impacts on Natura 2000 sites cannot be avoided this section of the indicative roadway will not be progressed.' (The indicative roads on the maps will be shown as an indicative broken line).
Recommendations		
It is considered appropriate to revert from S3 to the R1 Residential zoning for the Port Road Site.		

	Volume 2 – Town Development Plans - Listowel	
	Submission Summaries	CE Response and Recommendations
KE-C1-434 Listowel Business & Community Alliance	<p>The submission supports the positioning of Listowel as the key tourism driver for North Kerry in the context of the North Kerry Greenway and the Cliff Coast Development Plan.</p> <p>Suggested addition to objective LIS 3</p> <ul style="list-style-type: none"> • Support the policies and projects contained in the rural regeneration development fund submission for Listowel entitled; 'Where Stories Begin' project a new chapter in Listowel's economic transformation and prosperity; including <ul style="list-style-type: none"> • Re-establishing the 'Town Square' for both indoor and outdoor events and festivals as the Cultural Heart and Economic Centre of Listowel. • Positioning Listowel as a hub for Activity Tourism in North Kerry • Accommodating Enterprise Incubation, Expansion and Remote Working in Listowel 	The contents of the submission are noted. The submission suggests an addition to Objective LIS 3; however it is not considered necessary to make an amendment to this objective as the point outlined is covered by other sections of the Draft Plan. The Draft Plan is supportive of Digital Hubs and remote working and under the vision & strategy for Listowel it is viewed as important to sustainably support and strengthen Listowel's enterprise and employment opportunities, including both the Food Hub and Digital Hub and this is set out under Objective LIS 5.
KE-C1-434 Listowel Business &	<p>The submission suggests additional objective(s) as follows:</p> <ul style="list-style-type: none"> • Champion Listowel Town as a pilot Sustainable Town focusing on Sustainable Practices (community, business, and local authority). 	There are several objectives within the Draft Plan, if realized, will result in a Sustainable Town. These measures need to be put in place before a town could be

<p>Community Alliance</p>	<ul style="list-style-type: none"> • Incentivise the upgrading of existing buildings as they are an essential part of conserving our carbon budget over the coming decades. 	<p>piloted as a Sustainable Town, furthermore it is viewed that all towns within the county need to be adopting a sustainable approach given the current climate crisis.</p> <p>There are initiatives in place to assist property owners with the refurbishment of buildings as set out in Section 4.3 Active Land Management of the Draft Plan which include KCDP 4-31 which relates to the Repair & Leasing scheme; Buy & Renew scheme; and Living over the shop scheme.</p>
<p>KE-C1-429 Tom McElligott</p>	<p>This submission outlines suggestions for Listowel Town including:</p> <ul style="list-style-type: none"> - Distributing town centre uses throughout the town and not just in The Square - Consider traffic management measures - Improve street lighting - Activities for local community organisations inc. Kerry Parents and Friends. - Impact of / and on Greenway cyclists in terms of merging traffic, shared space with cars and pedestrians. - Use of existing town assets including the Listowel Racecourse which could be used more than twice a year. Open it up to ancillary Greenway use. - Additional car parking at Castleinch - Road realignment at Listowel 'Big Bridge' - Slip Road to Duagh 	<p>The majority of suggestions that are put forward in this submission for the town are already included in objectives contained in the Draft Plan, Listowel Municipal District Local Area Plan and associated strategies such as Listowel Historic Community led Regeneration, Listowel URDF etc. It is an objective (LIS7) of the plan to improve cycling and walking routes throughout the town and to enhance the public realm. The Council will also work with local stakeholders and community-based organisations to facilitate and support community led initiatives.</p> <p>The Plan recognises that the improvement of the public realm and its focus on strengthening pedestrian and cycling links into, through and further linkages to a wider cycle network in the town, the park and the North Kerry Greenway is key to the future sustainability of alternative transport modes. Creating an attractive town core with a high-quality environment and amenity offering will enhance the attractiveness of the town as a residential and business base.</p> <p>A masterplan is being undertaken for the Castleinch lands.</p>
<p>KE-C1-434 Listowel Business & Community Alliance</p>	<ul style="list-style-type: none"> • Continued investment in public realm improvements particularly in Listowel Town Centre and our surrounding villages. • Maximise the economic potential of the new North Kerry Greenway to help existing businesses and the development of new businesses in North Kerry. • Make Listowel a pilot town and provide supports and grants to make the upgrade and retrofitting of vacant properties economical. Make the planning and regulatory process less of a hindrance by positive and proactive engagement for change-of-use construction projects and above-the-shop conversions to expand the availability of housing in towns and villages. • Take cars off of the street and have a park and stride facility and/or provide alternative parking solutions i.e. use/purchase of lands in backways and infill lands so that more public space can be provided for businesses and residents. 	<p>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.</p> <p>The Local Authority acknowledges the economic potential of the Greenway given its successful implementation in other counties. LIS 6 sets out to realise the socio-economic potential of the North Kerry Greenway. Other objectives relating to the Listowel Greenway include Objective LIS 51, LIS 52 and LIS 81.</p> <p>The Draft Plan promotes and supports the redevelopment of vacant properties 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>It is an Objective of the Town Plan [LIS 25] to facilitate the preparation of a Town Centre Renewal Action Plan and create a Public Realm Plan and facilitate the sustainable regeneration and renewal of Listowel Town Centre's streets, public realm spaces, including the squares, park, nodes, walkways and greenways in order to</p>

	<ul style="list-style-type: none"> • The concept of placemaking is inclusive and incorporates the history, heritage and culture of towns and how they can develop and embrace the changing vision for towns. • A Placemaking Audit should be carried out/supported in conjunction with LBACA to help focus on what can be achieved by the town teams as outlined in the governments Town Centre First Policy • Public Service Departments should be relocated to Listowel i.e., a department of KCC similar to Castleisland Water Services. There are a number of vacant buildings within the town centre that could be used for this purpose. • More EV charging facilities at Neodata, Childers Park and Woodlands and the Church Carpark on the Bridge Road. 	<p>revitalise it as a prosperous, vibrant, attractive location in which to live, work, learn and visit.</p> <p>The Council is fully supportive of the Town Centre First Policy and several objectives within the Plan reflect this including LIS 25, 26, 27 & 30.</p> <p>The Local Authority seeks to implement Digital Hubs within Towns and settlements, including Listowel. Objective LIS 5 relates to strengthening and supporting Listowel’s enterprise and employment opportunities and Objective LIS 48 which relates to shared working spaces and a Digital Hub. Kerry County Council is currently preparing a new digital strategy for the county.</p> <p>A key strand of the Draft Plan is climate action and in this regard the Council is committed to implementing, supporting and enhancing sustainable transport methods. Objective KCDP 14-37 states “Support and facilitate the provision of electric charging facilities in car parks provided as part of commercial large retail or industrial developments” and Objective KCDP 14-4 states “Promote and support the expansion of the Electric Vehicle charging network (through direct provision by state agencies and in partnership with energy suppliers e.g., in the hospitality sector) and an increase in the numbers and usage of Electric Vehicles”.</p>
<p>KE-C1-434 Listowel Business & Community Alliance</p>	<p>The submission suggests the following:</p> <ul style="list-style-type: none"> • Local Renewable Energy solutions in the town should be prioritised and there should be a more open and proactive conversation between KCC and industry (for example Kerry Ingredients) regarding available land and renewable energy projects. • Identified opportunity sites (The Mart, Castleinch) should be developed in a sustainable way and should take into account Listowel’s status as a Heritage Town. 	<p>Kerry County Council is willing to engage with any industrial companies in relation to implementing sustainable energy solutions.</p> <p>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.</p>
<p>KE-C1-434 Listowel Business & Community Alliance</p>	<p>The submission is supportive of these objectives but questions when a retail strategy will be carried out. The submission further states that the Collaborative Town Centre Health Check should be reviewed and updated from the 2017 version.</p>	<p>It is an objective of the Draft Plan to carry out a Retail Strategy [KCDP 4-43] for the County within the lifetime of the plan, which may include elements of the Town Centre Health Check.</p>
<p>KE-C1-434 Listowel Business & Community Alliance</p>	<p>The submission questions if there are any planned projects in support of the North Kerry/ West Limerick/Shannon Estuary/Clare as a network including Listowel as an economic driver? It further questions what are the plans for the digital hub and cultural hub as outlined in objective LIS 69?</p>	<p>The Council supports the economic role and potential of the established towns of Listowel, Abbeyfeale, Newcastle West and Kilrush as economic drivers in a potential North Kerry/West Limerick/Clare network connected with the Shannon Estuary. This includes the Shannon Integrated Framework Plan (SIFP) area and strategic locations identified under the SIFP as a Shannon Estuary Coastal Network which includes the Tarbert/Ballylongford Landbank, which is supported by Objective KCDP 9-8.</p>

	<p>The submission states that a business incentive scheme for unoccupied outlets is urgently required as Listowel has experienced the highest number of business closures in the county during the Covid pandemic.</p> <p>It also states that further development is required to maximise Listowel's potential as a smart town and the availability of high-speed Broadband should be a priority now and used as a further economic and tourism driver for existing and potential new businesses as well as for remote working.</p> <p>The submission also seeks support for Greenway Business Support training similar to Limerick businesses.</p>	<p>Kerry County Council assists property owners in attracting new business as set out in Section 4.3 Active Land Management of the Draft Plan which include KCDP 4-31 which support the utilisation of current schemes to revitalise vacant properties in town centres.</p> <p>The Draft Plan contains several objectives in relation to digital connectivity and remote working. For Listowel specifically, Objective LIS 5 relates to strengthening and supporting Listowel's enterprise and employment opportunities and Objective LIS 48 which relates to shared working spaces and a Digital Hub. 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>KE-C1-434 Listowel Business & Community Alliance</p>	<p>The submission states that there is a Food Hub development in Listowel with potential for small food enterprise start-ups and tours and tastings from local producers once the facility is completed in 2022. The submission also seeks • upgrade and expand the current enterprise units located adjacent to the Listowel MD offices.</p>	<p>The contents of the submission are noted. Kerry County Council is willing to engage with interested parties in relation to the upgrade and expansion of the existing enterprise units. The upgrading of these units is included in the RRDF submission for Listowel.</p> <p>Amend LIS 5 Strengthen and support Listowel's enterprise and employment opportunities, including the development of the Listowel Food Hub, Digital Hub and upgrading of the existing enterprise units.</p>
<p>KE-C1-260 John Whelan</p>	<p>This submission relates to the development of Tourism and Retail Facilities in Listowel Town and for the North Kerry Area, and in particular the development of Charles Street, Colbert Street and Courthouse Road, Listowel.</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>KE-C1-434 Listowel Business & Community Alliance</p>	<p>The submission states that there is an urgent need for a Rural Recreation Officer for North Kerry to spearhead the positioning of Listowel as an Activity hub for Activity Tourism in North Kerry and also support new business ideas for rural tourism along the Greenway.</p>	<p>There is a Rural Recreation Officer for Kerry and whilst it is acknowledged that this position is located in South Kerry, the Department of Rural and Community Development is mandated with developing rural recreation in line with the objectives of the Walks Scheme and Rural Recreation Officers scheme. There are Objectives</p>

	<p>The submission states that increased visitor accommodation options including camper van and glamping, air b&b, guesthouses and farmhouse are needed.</p> <p>Listowel Business and Community Alliance requests additional supports to facilitate:</p> <ul style="list-style-type: none"> • Incorporate the Sustainable Development Goals {SDGs} logo on all future town signage. • Support and participate with groups such as Tidy Towns and local authorities to ensure the local landscape is protected and further enhanced. • Develop projects that will enhance our local heritage, specifically the literary culture that is the essence of what North Kerry is. • Further development and extension of the walk along the River Feale and a blueway plan for Listowel. • Peatlands - Grants for walks, bogs as amenities. • Funding is required for an Art Project for Listowel Inner Relief Road/Bypass and a signage strategy to encourage people to come into the town and increase footfall. 	<p>within the Plan relating to activity tourism which encompasses the Greenway. Relevant objectives relating to this include Objective LIS 51, LIS 52 and LIS 81.</p> <p>Kerry County Council recognises that the provision of varied accommodation types is essential to enable growth in the tourism sector. The Council recognises that the provision of suitable sites for camping/glamping, campervans and caravans is an important element in the range of tourist accommodation offers. The Draft Plan sets out objectives in relation to the provision of tourist accommodation including Objective KCDP 10-10. LIS 55 supports the development of a campervan and motor home facility in Listowel</p> <p>It is recommended to include the following additional objective in the Listowel Plan Obj LIS X Encourage the development of appropriate visitor accommodation in Listowel, to facilitate additional visitors to avail of the expanding tourism product in Listowel and North Kerry.</p> <p>Kerry County Council supports Tidy Town initiatives across the county. The Draft Plan sets out to develop the town in a sustainable manner and protect and enhance the local landscape and biodiversity, which is a key strand of the Draft Plan. Listowel’s Heritage is a key strand of the Town Development Plan and is outlined in Section 3.9. Objectives for its protection, enhancement and development are set out from LIS 58 to LIS 71. Section 3.10.2 of the Town Plan relates to the Listowel Blueway with a specific objective LIS 53 which seeks the sustainable development of the River Feale walkway and Blueway for Listowel and its incorporation into the trailhead, subject to environmental assessment as appropriate. It is an objective of the Plan [LIS 57] to provide improved tourist signage throughout the town. It may be possible to engage with the NTA/TII to obtain funding for signage for the Listowel Bypass.</p>
<p>KE-C1-434 Listowel Business & Community Alliance</p>	<p>Suggested Objective: To protect and conserve the special character of the historic core of Listowel and ensure that a full understanding of the archaeological, architectural, urban design and landscape heritage of the town informs the design approach to new development and renewal, in particular in Architectural Conservation Areas (ACAs).</p>	<p>Section 3.9 relates to Heritage & Built Environment. There are several objectives within the Town Plan which relate to protecting and enhancing the historic core of the town including Objectives LIS 58 to LIS 64.</p>
<p>KE-C1-41 Brendan O’Callaghan KE-C1-50 Brendan Danaher KE-C1-249 John Whelan</p>	<p>The submission outlines 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>

KE-C1-196 James Brennan		
KE-C1-50 Brendan Danaher	The River Feale is a designated Salmonid Fishery and SAC. Only people who have legal rights are angling clubs, riparian owners and landowners. Refer to the desktop study by Malachy Walsh and Partners - River Feale Catchment Management Baseline Data Collection and Desktop Study.	The contents of this submission are noted.
KE-C1-434 Listowel Business & Community Alliance	The submission is supportive of objective L for a bicycle pump track and urges KCC to apply for funding asap to help to achieve this as per the projects underway in Tralee and Killarney. However, states that the young people should be involved from the beginning as they know their town and co-design is required. A suggested location for the Bicycle Pump Track/Skate Plaza is on Kerry County Council owned lands to the rear of Listowel Castle running alongside the river Feale. This skate plaza development could form phase one of the overall masterplan for Castleinch and greater public realm improvements for Listowel.	The contents of this submission are noted. LIS 83 supports the development of a skate plaza at an appropriate location in Listowel town
KE-C1-87 Pat Carey	The submission raises concerns over the implications of road closures on vulnerable road users specifically in Listowel and if road closure is deemed unavoidable will mitigation measures be put in place in these instances. E.g., timely and up to date notification of elderly/vulnerable residents, weekly updates where works are ongoing and liaising with the Emergency Services and particularly An Garda Siochana. The submission also requests any operational procedures/manuals be referenced in the response to this submission.	It is a requirement that the public are notified of any road improvement works or road closure that are to take place. In this regard there is an opportunity for the public to engage with the roads department in relation to specific issues which may arise in relation to road improvement works.
KE-C1-434 Listowel Business & Community Alliance	The submission seeks that as part of the new bypass development upgrading is required for the entrance roundabouts including planting and road signage.	It is an objective of the Plan [LIS 57] to provide improved tourist signage throughout the town. It is possible to engage with the NTA/TII to obtain funding for signage for the Listowel Bypass as public consultation will be carried out prior to implementation of the works.

Recommendations

Amend LIS 5 Strengthen and support Listowel’s enterprise and employment opportunities, including the development of the Listowel Food Hub, Digital Hub and upgrading of the existing enterprise units.

New Objective LIS X Encourage the development of appropriate visitor accommodation in Listowel, to facilitate additional visitors to avail of the expanding tourism product in Listowel and North Kerry.

	Volume 2 – Town Development Plans – Listowel - Land Use Zoning	
	Submission Summaries	CE Response and Recommendations

<p>KE-C1-25 North Kerry Advertiser Ltd</p>	<p>The submission the rural areas under urban influence boundaries should be reduced from 10km to 2km or 1km.</p> <p>The Submission states upset that Listowel was not included in the 'Kerry Hub & Knowledge Triangle' and because of that requests that the boundary of Listowel be increased by 1km on all sides</p>	<p>The Rural Area Types map has been 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. An analysis of this data identifies the different types of rural areas. From the analysis carried out, the areas under significant urban influence, areas under urban influence and other rural areas have been identified and are shown on Map 5.1. The evidence clearly shows that there is an area under significant urban influence around Listowel town and at the same time there are 239ha of land zoned for agriculture within the town boundary. One of the main tenets of the Plan is to ensure compact sustainable growth thereby consolidating the town cores.</p>
<p>KE-C1-63 Homeland DAL Ltd.</p>	<p>The submission relates to a site located on the northern side of Listowel at Dun Álainn, Clieveragh, Listowel, and the proposed 'agricultural' zoning set out for same in the Draft Plan.7.5 The site, which was zoned as residential previously had permission for 156 no. housing units under application ref. no. 06/4032 but was not developed.</p> <p>The submission therefore requests that the proposed zoning of 'agricultural' is changed to residential zoning.</p>	<p>The zoning maps are aligned with the population allocation and housing land requirement as contained in the Core Strategy of the Kerry County Development Plan. To include additional lands for residential use would contravene the housing target/ land zoning requirement.</p> <p>In the draft plan, the Planning Authority has focused on renewing and developing the existing built-up area, making more efficient use of land in a sustainable manner rather than continued expansion and sprawl of the town in peripheral locations.</p> <p>The National Planning Framework, Ireland 2040 emphasises the need to consolidate town centres through prioritising the development of brownfield and infill sites first. From a sequential approach perspective, the lands are located on the periphery of the town and there are more suitable lands in closer proximity to the town centre and all its facilities.</p>
<p>KE-C1-163 John Barrett</p>	<p>The submission requests that as per the document accompanying the submission that the land be rezoned from mixed use within the CastleInch Master Plan for the purposes of Residential Development.</p>	<p>A mixed-use designation does not preclude the inclusion of residential use. A masterplan will be prepared for the Castleinch site whereby it will be detailed further as to the appropriate uses for the site. However, it must be noted that these lands are at risk of fluvial flooding and therefore vulnerable land use cannot be considered.</p>
<p>KE-C1-417 Louise and Cornelius Carey and O'Gorman</p>	<p>This submission refers to land at Clieveragh, Listowel. No map was attached.</p>	<p>The land is located adjacent to an existing industrial unit and the proposed Clieveragh Flood relief scheme on lands zoned (N2 Waste/wastewater).</p>
<p>KE-C1-178 Billy Sheehy</p>	<p>This submission requests that lands at Model Farm, Clieveragh and Curraghtoosane, Listowel are rezoned from agriculture to mixed use, general development, opportunity/proposal or industrial.</p>	<p>There is 38.8 ha of Commercial/industry/ enterprise lands zoned within the town boundary. These lands are situated at Clieveragh Industrial park or are adjacent to it. It is considered that there is adequate land zoned for this use. The proposed lands are situated in a peripheral location at the edge of town. Zoning of these lands is not appropriate from a sequential approach and would be contrary to sustainable development.</p>
<p>KE-C1-426 Shaun Hegarty</p>	<p>This submission outlines proposals regarding densities etc.</p>	<p>The Draft Plan provides strengthened policy support for sustainable higher densities, facilitates compact growth and the development of vacant brownfield/infill sites. The</p>

	Rationale for this submission relates to an infill site at Slí na Spéire Development, Clieveragh, Listowel and requests that any future planning applications would support a suitably higher density and that the original submission would be revisited and its content appropriately included in the Draft Kerry CDP 2022-2028.	Planning Authority seeks to ensure that all developments are carried out in a sustainable manner and comply with the 'Sustainable Residential Development in Urban Areas Guidelines and other relevant guidelines regarding density etc. The appropriate density for applications for housing developments will be determined by design/layout and to ensure the provision of a mix of unit types in proximity to existing and proposed services and infrastructure, in order to meet and adapt to the changing demographic trends and household profiles in a neighbourhood. Individual proposals can be dealt with on a case-by-case basis.
KE-C1-434 Listowel Business & Community Alliance	The submission seeks that the Plan ensures that enough land is zoned to cater for the projected increase in population.	There is sufficient residential land zoned within the Town Boundary to accommodate the projected population growth within the development plan cycle of 2022-2028. The Core Strategy envisages a population growth of 529 persons over the lifetime of the plan. This population growth equates to 415 residential units. It is envisaged that 30% of new housing in Listowel will be on infill and brownfield sites. The provision of the required housing unit shall occur within the town boundary in accordance with the Core Strategy.
Recommendations		
No proposed amendments		

Volume 3 – Heritage - 1. List of Public rights of Way		
	Submission Summaries	CE Response and Recommendations
KE-C1-37 Denise Collins	This submission requests that 4 Rights of Way in Kells should be included: Kells to Faillrí Kells Lough Foileye Pier Roadens Path from Roads to Foilmore Church	As it has not been confirmed that it is a public right of way, it cannot be included as per section 10(2)(o) of the Act which refers to the inclusion of existing public rights of way. 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
KE-C1-96 Fenit Community Network	The proposal contained in this submission is that the pathway around the coastal margins of Fenit Island, which have been in habitual use by the public for ten years, be listed as a public, pedestrian right of way (PROW) in the Kerry County Development Plan 2022-2028 in accordance with Section 10(2)(o) of the Planning and Development Act as amended.	The submission provides a very lengthy and detailed report and reasoning for the inclusion of the Fenit island coastal pathway as a Public Right of Way. Notwithstanding the potential economic, social and community benefits of the pathway on Fenit island this response can only deal with the substantive issue of whether there is a Public Right of Way at this location. The Council acknowledge that this pathway is well established and a trackway around the island giving access to the beach has also been in existence for a significant period of time.

		<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>The submission requests that Kerry County Council designate the path around Fenit Island as a public right of way. The evidence put forward in the submission outlines how the track around Fenit Island has been in habitual use but its legal status as a public right of way has not been confirmed. As it has not been confirmed that it is a public right of way, it cannot be included as per section 10(2)(o) of the Act which refers to the inclusion of existing public rights of way. 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>
<p>KE-C1-210 Fiona O'Sullivan KE-C1-209 Padraig O Suilleabhain</p>	<p>This submission supports the inclusion of the access road to Coomatloukane Beach, as a registered Right of Way.</p>	<p>Submission is noted</p>
<p>KE-C1-159 Brian Coffey</p>	<p>The submission comments that Kerry County Council should capitalize on the wave of enthusiasm for walking the land and significantly increase efforts to register more rights of way in the CDP. This will encourage greater tourism and safeguard access</p>	<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 included in the plan.</p>
<p>KE-C1-164 Ballylongford Enterprise Association</p>	<p>The submission requests the Walk to Napoleonic Battery site on Carrig Island be added to the list of public rights of way.</p>	<p>This submission refers to a path/track that runs from the L10033 on Carrig Island westwards along the edge of the island as far as the Napoleonic Battery. It passes over private land.</p>
<p>KE-C1-165 Kate Carmody</p>	<p>The submission recommends that the following be added to the list of public rights of way;</p> <p>The five ROWs are as follows</p>	<p>As it has not been confirmed that it is a public right of way, it cannot be included as per section 10(2)(o) of the Act which refers to the inclusion of existing public rights of way. 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>

<p>KE-C1-166 Niamh Daly</p> <p>KE-C1-397 North Kerry Environmental Forum /Association</p> <p>KE-C1-27 Caragh Lake Conservation Association</p>	<p>The path from the side of the new club house at Ballybunion golf club going to the strand. The path can be seen clearly on Google maps.</p> <p>The other four ROWs are on the old Ordinance survey maps. Three are from the end of the L1000-2. One goes over the sand dunes to the old boat house. The other two go left and right off the end of the road L1000-2. These routes are regularly walked and should be acknowledged.</p> <p>The other ROW goes off the L1000-2 down a track past the ruins of Beal Castle and onto the strand.</p> <p>The submission recommends that access to the north shore of Lough Leane be added to the list of public rights of way to allow future generations access and enjoy our lakes.</p> <p>The submission advises that the access to the beach at the old Daly's Seaweed Baths area on Ladies Strand was a traditional route of access and right of way to the seashore.</p> <p>This submission requests that a ROW to Caragh Lake (marked on online map) is accessible and open to the public.</p>	<p>The potential public right of way is described in the submission but a map to show its location or other supporting information has not been submitted. There is direct access to the Ladies Strand beach, it is therefore not necessary at this stage to list another without additional information regarding same being provided.</p> <p>The site is located at Glannagilliagh near the Caragh Lake Forest recreational park. There is a continuous stone wall on the lake side of the road with no visible breaks or gaps. Maps in the area also do not provide an indication of an access point to the lake at this location.</p>
<p>KE-C1-132 thomas staehlin</p>	<p>This submission supports inclusion of ROW 41 as a public right of way, as the landowner, but stipulates that it must be outlined in the Plan that this is for pedestrian use only.</p>	<p>Section 10(2)(0)P & D Acts states that the council shall identify public rights of way, inclusion on the list is simply a recording that a particular path/track is an existing public right of way. The listing of a public right of way does not change the status of same and does not stipulate if it is pedestrian or vehicular.</p>
<p>ROW 6b (access to the beach from the L10483 at Carrahane Lower, Ardfert)</p>		
<p>KE-C1-8 Pat Lawlor</p>	<p>This submission outlines concerns that residents have regarding proposed ROW reference - ROW 6b (access to the beach from the L10483 at Carrahane Lower, Ardfert). Their concerns include management of lands and the environmental impact the ROW could have on coastal erosion and the need for a NIS as it is through a Natura 2000 site (000332).</p>	<p>Response The inclusion of a Right of Way on the list is recording the existence of same, therefore no change to the status of this track/pathway is taking place.</p> <p>Evidence has been submitted as part of submissions on the development plan of a circuit court judgement from 1978 regarding the status of this public right of way. This public right of way gives access to the seashore. Its</p>

<p>KE-C1-77 Helen O'Carroll KE-C1-161 Helen O'Carroll</p>	<p>Banna / Carrahane Residents Group - ROW 6b (access to the beach from the L10483 at Carrahane Lower, Ardfert) - Addition to original submission</p> <p>Carrahane Tennants Group - ROW 6b (access to the beach from the L10483 at Carrahane Lower, Ardfert) - Further addition to original submission</p> <p>The Submission states that there is already an existing public right of way at the proposed Right of Way 6b Access to the beach from the L10483 at Carrahane Lower, The author states and provides documents in support of their claim that this existing public right of way was decided by a legal determination in circuit court.</p>	<p>listing in the development plan would therefore comply with Section 10(2)(o) of the Planning and Development Acts 2000-2020.</p> <p>The development plan is listing an existing right of way, not creating a right of way, it would therefore not require a NIS. The Draft Plan is subject to Strategic Environmental Assessment (SEA) which assesses the likely significant effects the implementation of the Plan will have on the environment, and an Appropriate Assessment (AA), contained in a Natura Impact Report (NIR), which assesses the likelihood for adverse effects on the integrity of the Natura 2000 network.</p> <p>It is therefore recommended that the list of public rights of way is not amended.</p>
<p>Recommendations No Recommended Changes</p>		

	<p>Volume 3 – Heritage 3. National Monuments & Registered Monuments</p>	
	<p>Submission Summaries</p>	<p>CE Response and Recommendations</p>
<p>KE-C1-37 Denise Collins</p>	<p>This submission requests that a walled structure at Foileye Pier, Kells and an EIRE sign in Roads is included</p>	<p>It is proposed to add the remaining Look Out Posts and EIRE signs to the RPS. Kindly see Additions Doc.</p>
<p>KE-C1-368 Adrian Sheehan</p>	<p>The submission requests that all historical sites, buildings and structures relating to the War of Independence be protected and maintained in order to preserve and document this influential time in our history for generations to come. It specifically references Headford junction.</p>	<p>It is considered that this would be more appropriately addressed by the Department of Heritage and the OPW.</p>
<p>Recommendations No Recommended Changes</p>		

	<p>Volume 3 – Heritage - 5. Record of Protected Structures</p>	
	<p>Submission Summaries</p>	<p>CE Response and Recommendations</p>
<p>KE-C1-165 Kate Carmody</p>	<p>This submission seeks the retention of NIAH 21300506 RPS5-6 on the record of protected structures.</p>	<p>See response to Ke-C1-18. By virtue of its dilapidated condition, it is recommended that the structure is removed from the RPS.</p>

<p>KE-C1-200 Amy Rudd</p>	<p>It is requested that Council consider the addition of the Latitude and Longitude stone at Waterville Cable Station to the list of protected structures.</p> <p>This memorial stone was erected by Commercial Cable Company Waterville Cable Station to record the Latitude and Longitude of Waterville, which was determined in 1892, The stone was lost for several decades but was restored to Waterville Cable Station in 2013</p>	<p>It is not considered appropriate to include this structure on the RPS as it is not considered to warrant inclusion in the RPS based on the criteria outlined in the Guidelines for Historical, Scientific or Technical interest.</p>
<p>KE-C1-200 Amy Rudd</p>	<p>The submission requests the addition of 'Scientific' to the description of the following Protected Structure - SPUNKANE 21309805 98-5. DETACHED HOUSE (FISHING LODGE) IVERAGH LODGE R ARCH, ART, HIST, SOC, TECH. The submission also requests the addition of 'Technology' to the description of the following Protected Structure - SPUNKANE 21309801 98-1. CABLE STATION WATERVILLE CABLE STATION R ARCH, ART, HIST, SOC.</p>	<p>The Architectural Heritage Protection Guidelines for Planning Authorities (2011) outlines the following in relation to Scientific Interest: Section 2.5.14 The scientific interest, or research value, of a structure depends on the importance of the data involved and on its rarity and/or quality. Its scientific interest should also be assessed as to how well it represents the area of research in question and the degree to which the structure may contribute further objective information. For example:</p> <ul style="list-style-type: none"> a) the results of scientific research may be seen in the execution of the structure; b) the materials used in the structure may have the potential to contribute to scientific research, for example extinct pollen or plant species preserved in the base layers of ancient thatch roofs; c) the structure may be associated with scientific research that has left its mark on the place, such as early Ordnance Survey benchmarks carved into stonework. <p>It is not considered appropriate to include the designation of Scientific special interest in this case as it is not considered to warrant inclusion in the RPS based on the criteria outlined in the Guidelines.</p>
<p>KE-C1-7 Bryan McKenna</p>	<p>This submission requests that protected structure reference RPS KY 043-028 known as Flahive's Bar, Strand Street, Dingle is removed from Kerry County Council's Record of Protected Structures. The property is included in the Dingle / Daingean Uí Chúis Architectural Conservation Area included in the Corca Dhuibhne Electoral Area Local Area Plan 2021-2027.</p>	<p>The submission relates to Flahive's Bar, Strand Street, Dingle, and it is requested to remove it from Kerry County Council's Record of Protected Structures. It states that the front building has been significantly altered over the past years. It states that 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.</p> <p>It is proposed to delete this structure – see Amendments to Draft CDP Additions & Deletions in the Appendix.</p>
<p>KE-C1-18 James Griffin</p>	<p>This submission requests the removal of the house known as "Allens", Lahesrough North, Ballybunion. NIAH 21300506 RPS 5-6 from the record of protected structures.</p>	<p>The submission relates to a property at Allens, Lahesrough North, Ballybunion. It is requested that the structure be removed from the list due to its current condition.</p>

		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 in the Appendix.
KE-C1-137 Liam Geary	The submission states that the Listed buildings section of planning should be revisited as the submission questions if it is fit for purpose.	The contents of this submission are noted. No change to the Draft County Development Plan is recommended.
KE-C1-83 Peter Browne	It states that the Granada Convention was introduced in 1987 to protect Europe's Heritage and Ireland ratified the Convention in 1997; the RPS process being an instrument of the Convention. Mr Browne is the registered owner of a property adversely affected by a 2019 RPS process, and has grave concerns that a local authority can act outside of the principles on the Convention with the support of the Dept of Heritage.	The contents of this submission are noted. No change to the Draft County Development Plan is recommended.
KE-C1-333 Maurice Coffee	The submission relates to Ballybrack Cottage, Waterville. It is requested that it is removed from the list of protected structures.	This structure was previously added to the RPS on the basis of its special architectural category of interest and for its significant contribution to the architectural heritage of Waterville. It should be highlighted that Kerry County Council administers conservation grants for conservation-led upgrading and renovation of protected structures. As a protected structure, the owner would be eligible to apply for this grant-aid. The designation of a structure as a protected structure does not impede its redevelopment but seeks to achieve a high-quality design and finish maintaining the inherent character of the structure. No change recommended.
<p>Recommendations Proposed deletions,</p> <p>NIAH 21300506 RPS5-6 on the record of protected structures- See response to Ke-C1-18. It is recommended that the structure is removed from the RPS.</p> <p>Flahive's Bar, Strand Street, Dingle Reference RPS KY 043-028 -It is proposed to delete this structure – see Amendments to Draft CDP Additions & Deletions doc.</p> <p>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</p>		

	Volume 3 – Heritage - 6. Additions to the Record of Protected Structures
	Submission Summaries CE Response and Recommendations

<p>KE-C1-47 Edmond & Ian Cahill</p>	<p>The submission is opposed to the proposed addition of the Former Presbytery, Adrea, Tousist to the Record of Protected Structures (RPS) as it states that it is not the original building.</p>	<p>This structure was proposed for addition to the RPS on the basis of its special architectural, historical and social categories of interest. The architectural style of this building is most distinctive and significantly adds to the character of the Ardea area. It should be highlighted that Kerry County Council administers conservation grants for conservation-led upgrading and renovation of protected structures. As a protected structure, the owner would be eligible to apply for this grant-aid. The designation of a structure as a protected structure does not impede its redevelopment but seeks to achieve a high quality design and finish maintaining the inherent character of the structure.</p> <p>No change recommended.</p>
<p>KE-C1-28 BRIAN FARRELL</p>	<p>This submission outlines the historical importance of Look Out Posts (LOPs) on the coast and encourages listing all the LOPs in the County.</p>	<p>The submission relates to Lookout Posts in the County Development Plan. The submission congratulates KCC on having the vision to recognise the value of these posts . It is suggested that KCC examine the remaining Lookout Posts in the county with a view to listing them in the County development plan and ensuring the structures are preserved.</p> <p>It is proposed to add the remaining Look Out Posts to the RPS. Kindly see Additions as contained in the Appendix.</p>
<p>KE-C1-30 Dermot Mangan KE-C1-37 Denise Collins</p>	<p>This submission (linked to previous submission KE-C1-28 and KE-C1-20) requests the preservation of Look Out Posts (LOPs) and EIRE signs along the coast.</p> <p>It is requested that the preservation of all the remaining Lookout Posts are included in the Development Plan. It is suggested that Kerry CC should have a policy of encouraging local groups to reinstate their EIRE signs where possible. They would be a wonderful Tourist Attraction.</p>	<p>See KE-C1-20 Donard deCogan and KE-C1-28 BRIAN FARRELL</p> <p>It is proposed to add the remaining Look Out Posts to the RPS. Kindly see Additions as contained in the Appendix.</p>
<p>KE-C1-118 Seamus Lynch</p>	<p>It states that the Valentia Trans Atlantic Cable project should not be included in the Kerry County Development Plan or submitted to the tentative list for consideration until all the Residents of Valentia are informed of its implications and the majority are in agreement. It states that the Two Storey House at Farranreagh, Knightstown, Valentia that is recommended to be added to the Record of Protected Structures by Kerry Co Council, was already delisted from the Record of Protected Structures.</p>	<p>This structure was proposed for addition to the RPS on the basis of its special architectural and social categories of interest. The architectural style of this building is most distinctive and significantly adds to the character of Knightstown. It should be highlighted that Kerry County Council administers conservation grants for conservation-led upgrading and renovation of protected structures. As a protected structure, the owner would be eligible to apply for this grant-aid. The designation of a structure as a protected structure does not impede its redevelopment but seeks to achieve a high-quality design and finish maintaining the inherent character of the structure.</p> <p>It is not recommended to omit this structure from the RPS.</p>
<p>Recommendations</p>		

It is proposed to add the remaining Look Out Posts and EIRE signs to the RPS. See Additions Documents in the Appendix.

Volume 3 – Heritage - 7. Architectural Conservation Areas		
	Submission Summaries	CE Response and Recommendations
KE-C1-200 Amy Rudd	This submission 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
Recommendations		
It is proposed to include this as an ACA, see appendix for more details		

Volume 4 – Maps 6. Tarbert – Ballylongford Landbank		
	Submission Summaries	CE Response and Recommendations
	<p>Issue: Proposed Tarbert Ballylongford landbank zoning at Ardmore and zoning extension at Tarbert</p> <p>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 and greenfield lands within the site of the Bastioned star shaped fort at Tarbert within the landbank. It is noted that the Natura Impact Report undertaken as part of the plan making process recommends removal of the pNHA land from the proposed extension. The OPR submission supports this recommendation. Submissions have also been submitted in support of proposed Development Objective KCDP 9-28 in the draft plan which seeks to protect sites of significant historical military importance along the Shannon Estuary, including the Battery on Carrig Island, Carrigafoyle Castle, the Bastioned Star Shaped Fort in Tarbert and the core area of Fort Shannon at Ardmore point.</p>	<p>CE Recommendation</p> <p>It is recommended that the lands contained within the Tarbert Bay pNHA, identified in red in the following map to be removed from the Tarbert Ballylongford landbank maps contained in Volume 4 of the plan. In addition, and notwithstanding proposed development objective KCDP9-28, it is recommended to remove the landbank zoning from the Bastion star shaped fort site in Tarbert and the Fort Shannon WWII military compound. The stated area of the landbank as outlined in S9.6.1 of Volume 1 should be reduced accordingly.</p>
Recommendations		
Check where this amendment is in the report??		

Volume 5 – Environmental Reports - 1. Strategic Environmental Assessment (SEA)		
	Submission Summaries	CE Response and Recommendations
KE-C1-388 Safety Before LNG	The submission states that the Strategic Environmental Assessment and the Natura Impact Report submitted with the Draft County Development do not take any account of the climate, public health and adverse human rights impacts of a fracked gas import terminal proposal on the Tarbert-Ballylongford Landbank.	An overview of an assessment of the policies and objectives relating to the Tarbert/Ballylongford land bank is outlined in Chapter 7 of the SEA with mitigation provided in Chapter 8. The SEA in its assessment of the zoning and associated policy addresses the key environmental

		<p>parameters of the SEA Directive, namely populations/human health; biodiversity; water; geology/soil; air/climate factors; cultural heritage; material assets; landscape; Flooding and associated interrelationships. Furthermore, the SEA is informed by an assessment as outlined in the SIFP of likely effects on the above parameters as informed by its own SEA undertaken as the plan was drafted, in consultation with key environmental stakeholders including the EPA. This equally addresses likely significant effects on human populations/health. Regarding climate policy, it is acknowledged widely in European, National and Regional policy that gas will form part of the energy mix as Europe transitions towards a decarbonised energy sector.</p>
<p>Recommendations</p> <p>No change Recommended</p>		

<p>Volume 5 – Environmental Reports - 2. Natura Impact Report (NIR)</p>		
	<p>Submission Summaries</p>	<p>CE Response and Recommendations</p>
<p>KE-C1-74 Irish Hen Harrier Winter Survey</p>	<p>Kerry County Council is encouraged to engage with statutory and non-statutory ecological data holders to inform sustainable development and seek to avoid inadvertent damage, particularly to Annex species.</p> <p>It is also suggested that reference is made to winter roosting as clear reference must be made to the fact that 8 months of the year are outside the breeding season which require close attention.</p>	<p>This submission highlights the importance of Hen Harrier Winter Roosting Sites, which can be located outside of designated SPAs, for achieving the conservation objectives of Hen Harrier SPAs. While amending Natura 2000 site boundaries to include additional areas of significant importance for qualifying Interest species is a matter for the National Parks and Wildlife Service (NPWS), Kerry County Council acknowledges that lands located outside of SPAs designated for Breeding Hen Harrier can potentially be of importance to Qualifying Interest Hen Harrier. To this end, both S12.5.4.1.4 and S12.5.4.1.7 refer to at least 2 years of annual (breeding and wintering) bird survey work to inform planning applications. In light of the submission received, it is considered appropriate to highlight within the plan, the availability of relevant ecological data, including data held by the Irish Hen Harrier Winter Survey to better inform planning proposals from the onset. This information would subsequently be taken into account by the relevant Consent Authority, which may or may not be Kerry County Council.</p> <p>Recommended amendments</p> <p>12.5.4.1.4 Open-to-Consideration Second last bullet point to be amended as follows:-</p>

		<p>Ensure that all applications are in compliance with Article 6 Habitats Directive, EIA Directive and Water Framework Directive. Where applicable, this should be informed by at least 2 years of annual (breeding and wintering) bird survey undertaken to best practices guidelines <i>in addition to early engagement with statutory and non-statutory holders of ecological data, including with the Irish Hen Harrier Winter Survey.</i></p> <p>12.5.4.1.7 Repower Areas KCDP 12-16 bullet point (C) to be amended as follows:- (c) Ensure that all mitigation measures outlined in a Natura Impact Statement, submitted in support of Repowering proposals within or in proximity to SPAs designated for Breeding Hen Harrier shall be certain beyond all reasonable scientific doubt and shall be supported by robust evidence including at least 2 years of annual ornithological survey work. <i>As part of this, early engagement with statutory and non-statutory holders of ecological data should be undertaken, including with the Irish Hen Harrier Winter Survey.</i></p>
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Recommendations		
<p>12.5.4.1.4 Open-to-Consideration Second last bullet point to be amended as follows:- Ensure that all applications are in compliance with Article 6 Habitats Directive, EIA Directive and Water Framework Directive. Where applicable, this should be informed by at least 2 years of annual (breeding and wintering) bird survey undertaken to best practices guidelines <i>in addition to early engagement with statutory and non-statutory holders of ecological data, including with the Irish Hen Harrier Winter Survey.</i></p>		
<p>12.5.4.1.7 Repower Areas KCDP 12-16 bullet point (C) to be amended as follows:- (c) Ensure that all mitigation measures outlined in a Natura Impact Statement, submitted in support of Repowering proposals within or in proximity to SPAs designated for Breeding Hen Harrier shall be certain beyond all reasonable scientific doubt and shall be supported by robust evidence including at least 2 years of annual ornithological survey work. <i>As part of this, early engagement with statutory and non-statutory holders of ecological data should be undertaken, including with the Irish Hen Harrier Winter Survey.</i></p>		

	Volume 6 – Other Documents - 1. Development Management Standards & Guidelines	
	Submission Summaries	CE Response and Recommendations

<p>KE-C1-363 NEWKD</p>	<p>The submission states that in the planning application process, no objection should be allowed from persons living more than 40 km from the development, and all objections should require a payment.</p>	<p>The Planning and Development Regulations 2001, as amended under Article 9, sets out the requirements in respect to making a submission or observation. Any person has a right to make a submission and all submissions received must be accompanied by the appropriate fee. Kerry County Council has no legal authority to amend these provisions.</p> <p>No amendment proposed.</p>
<p>KE-C1-375 Southern Region Waste Management Office</p>	<p>The submission suggests that a reference to the importance of incorporating within sustainable design principles the planning for re-purposing and reuse of buildings in preference to demolition and rebuild, especially in relation to design of commercial and large-scale buildings.</p>	<p>Point raised is noted. Under Section 1.3.1 Energy Efficiency, Sustainable Design and Construction of the Development Management Standards Chapter, a specific reference is made to the use of sustainable building principles and retrofitting existing buildings which is understood to mean that the re-purposing and reuse of buildings should be considered where possible. However, in the interests of clarity the following text should be inserted at the end of paragraph 5.</p> <p>It is important that the potential to re-purpose and re-use a building is considered in the first instance in preference to demolition and rebuild where practicable and reasonable to do so.</p>
<p>KE-C1-74 Irish Hen Harrier Survey</p>	<p>Suggested wording for: Kerry County Council will engage with statutory and non-statutory holders of ecological data to inform sustainable development and seek to avoid inadvertent damage, particularly to Annex species.</p> <p>Elsewhere in the development plan, where there is a reference to the Hen Harrier, clear reference must be made to the fact that 8 months of the year are outside the breeding season which require close attention. It is advisable to try to protect a bird for 25% of the year if it is under significant pressure for 75% of the year. For example, some wind farms were developed in winter roosts and those roosts were lost, affecting the breeding population of the SPA. This is an issue recognized by the EU Commission and relevant to the Birds Case which is currently open against Ireland by the Court of Justice of the European Union. Planning in advance to include winter roost sites reduces the threat of persecution when proposing developments at these sensitive sites.</p>	<p>Volume 6, S1.15.1 Wind Energy bullet point to be amended as follows:-</p> <ul style="list-style-type: none"> • Ornithological (bird) survey (winter and breeding) for at least 2 years prior to a planning application being made. As part of this, the Irish Hen Harrier Winter Survey (IHHWS) should be consulted with in relation to Hen Harrier Winter Roost locations.
<p>KE-C1-397 North Kerry Environmental Forum /Association</p>	<p>This submission highlights That while the plan states that lighting proposals are required to demonstrate that they do not interfere with the integrity of the Kerry Dark Sky Reserve but seeks that all lighting proposals should be well designed countywide using shield lighting, reduced energy consumption as light pollution [urban sky glow, light trespass, glare & clutter) is an increasing problem.</p>	<p>It is an objective of this plan and where resources allow to replace the public lighting system throughout Kerry with a more energy efficient, money saving, dark-sky compliant lighting system. The council will also encourage measures to support the Kerry International Dark-Sky Reserve throughout the lifetime of the Plan and ensure that external lighting and lighting schemes are designed so that the incidence of light spillage is minimised ensuring that the amenities of adjoining properties, wildlife and the surrounding environment are protected</p>

	<p>The submission does states that non-compliance with drawings/plan approved under planning permission does not respect the central importance of public notice and participation under the Planning & Development Acts and the pillars of the Aarhus Convention.</p>	<p>The plan is supportive of improved energy efficiency projects and initiatives, including retro fitting of energy efficiency measures.</p> <p>The Planning and Development Regulations 2001, as amended clearly specifies the information to be submitted in order to make a valid planning application. Where the specified requirements have not been met, the application is deemed invalid and the planning application returned to the applicant. All relevant parties are informed of this decision. This does not in any way infringe an individual's rights in terms of public participation with respect to making an observation or submission.</p>
<p>KE-C1-106 An Post</p>	<p>The submission seeks that the existing and future operational requirements for postal facilities are considered within the County Development Plan including parking, deliveries and access.</p> <p>It also requests that Kerry County Council provide flexibility with car parking standards for postal facilities and important to note that Postal facilities may require a greater quantum of car parking spaces going forward as postal trends continue to evolve, making it imperative that facilities are future proofed to ensure the long-term viability of An Post's operations. Therefore, the submission requested that the new Parking Strategy for the County consider these factors</p>	<p>The points raised are noted. The car parking standards set out under Table 4 of the Development Management Standards indicate minimum requirements in accordance with the location of a proposed development (within one of the three planning areas identified under section 1.20.7) reflective of the anticipated parking demand.</p> <p>The Development Plan states that a flexible approach to these standards may be applied where 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.</p> <p>Equally the Development Plan does not preclude the provision of additional car parking if required by the planning applicant to facilitate the site-specific solution.</p>
<p>KE-C1-137 Liam Geary</p>	<p>The submission states that any objection to a planning application can only be entertained if the objector resides within 5km.</p>	<p>Point made is noted, see response to submission No. KE-C1-363.</p>
<p>KE-C1-359 Circle K Ireland Energy Group Limited</p>	<p>The submission raises concerns in relation to a retail cap of 50sqm as set out in the Development Management Standards of the Plan. The submission believes that this is a misinterpretation of the Retail Planning Guidelines and that these do not even preclude retail developments in excess of 100m² net, rather, they state that in respect of any development in excess of 100m² net the sequential approach will apply. It is also set out in the submission that several Circle K service stations are located within established urban centre locations in the county and should not therefore be inhibited by any restrictive policies in terms of their retail development and that their location in itself justifies retail development.</p> <p>The submission seeks that the Plan takes account of the following: Recognition that the nature of the service station market has evolved considerably and acceptance of their various forms and locations. Support for the important local service function performed</p>	<p>The proliferation of and the growth of edge of town petrol filling stations have undermined existing town centres and retail services in satellite small village settlements . It is essential in order to reduce car dependency to achieve our climate change targets and in the interest of retaining retail services in the core of small villages that car dependant retail in the periphery of settlements is discouraged</p>

	by urban stations and the sustainability of those established in residential neighbourhoods. Acknowledgement of the expectations and requirements of the modern consumer in determining appropriate policies for this type of retailing. Incorporation of reference in accordance with the Retail Planning Guidelines to development in excess of 100sqm net retail sales area being acceptable in principle, subject to normal planning and development considerations.	
KE-C1-304 MWP	The submission seeks inclusion of wording "The Council also recognises that expansion and diversification of existing or vacant tourist visitor facilities can attract a more diverse visitor base." to Section 1.12.1. The submission also seeks amendments to the wording of how planning applications would be assessed.	Points raised are noted. The Council actively encourages and facilitates the diversification in the tourist industry and the renovation and renewal of existing vacant properties. Objective KCDP 10-27 specifically supports development that ' <i>...involves the re-use or diversification of an existing building, subject to normal planning criteria,</i> while objective KCDP 10-28 states it is an objective of the Council <i>to encourage the sensitive redevelopment and / or return to suitable use, of derelict, vacant or redundant buildings, in appropriate locations in order to provide for visitor accommodation and tourism development.</i>
KE-C1-358 Cllr. Breandán Fitzgerald	The submission states that any future residential developments of a substantial size that are more than 1km from the urban centre should provide recreational amenities and footpaths/cycle lanes.	Point raised is noted. The zoning of residential land (outside of the settlements of Tralee, Killarney, and Listowel) will occur as part of the relevant settlement Local Area Plan (LAP) and will take into consideration the Core Strategy set out in the County Plan, relevant national policy and Ministerial Guidelines in respect to the most suitable location of lands to be zoned for residential use. It is the policy of the Council to prioritise the development of residential units on vacant and infill sites, which are available within close proximity to the town/village centre in the majority of settlements. All developments will be assessed on (amongst other issues) the availability of services or the ability to provide for same including the provision of pedestrian and cycling infrastructure and recreational facilities as appropriate.
KE-C1-148 Eibhlín Gleeson	The submission requests that we ensure the correct spelling is used when naming housing estates.	In March 2021 Kerry County Council established an external independent three person Irish Language Advisory committee to advise the Council in identified areas. The Committees advises the Council generally in terms of the promotion and development of the language within the Local Authority. In particular, however, the committee advises the Council on the naming of Housing Estates both private and public in the Gaeltacht areas.
KE-C1-181 Avison Young (on behalf of	The submission seeks clarity on the car parking requirements for convenience retail operators.	Table 4: Parking Requirements under Section 1.20.7 – Car Parking Standards contained in the Development Management Standards and

<p>Tesco Ireland Limited)</p>	<p>The submission also seeks that the Plan acknowledges the requirements of modern retailers including appropriate floorplates, car and bicycle parking and servicing access, where possible.</p>	<p>Guidelines – Volume 6, illustrates the car parking standards for different types of development. These planning areas are as follows: Area 1 Retail core areas (Tralee, Killarney & Listowel) Area 2 Lands Located within town centres (Areas zoned M2) Area 3 All other areas (& other settlements) (Note: the retail core & town centres M2 lands are shown on the land use zoning maps in the relevant towns plan & LAPs) A convenience shop comes under the column title Shops, Retail Stores.</p> <p>Comment noted in respect of the requirements of a modern retailer. It should be noted however that the Plan states that a flexible approach to these standards may be applied where 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.</p>
<p>KE-C1-320 Harmony Solar Ireland Limited</p>	<p>The submission seeks to ensure that the Council acknowledges that solar panels are considered water compatible and will not be impacted by a flood event. Their provision in a flood zone should not be precluded. Section 1.15.2 should be revised to state the following: “Adequate drainage, surface water run-off and flooding mitigation such as placement of panels above the flood level. All development proposals within or incorporating areas of moderate or high risk of flooding (Flood zone A & B) shall be accompanied by a site-specific Flood Risk Assessment in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (DHELG and OPW, 2009)”.</p> <p>Also seeks inclusion of specific objectives which should state the following “The duration of the permission for solar PV developments (The period in which the development can be completed), should be for a period up to ten years from the date of grant of planning permission.” An objective should be included that “The lifetime for future solar PV developments be granted planning permission for an operational period of between 35-40 years”.</p>	<p>The Planning System and Flood Risk Management Guidelines for Planning Authorities (DHELG and OPW, 2009) classifies the vulnerability to flooding of different types of development as set out under Table 3.1 of those Guidelines. Section 3.5 of those Guidelines sets out clearly the type of development that can or cannot be considered within Flood Zone A, B and C. These are Section 28 Ministerial Guidelines, and the Local Authority is obliged to comply with them. It should be noted the Guidelines do not preclude the consideration of certain types of development such as Solar Panels within Flood Zone B, once a justification test is met.</p> <p>The standard timeframe for planning permission to be completed is 5 years under the Planning and Development Act, 2000, as amended. However, a Planning Authority under Section 41 of the Act may having regard to the nature and extent of the relevant development specify a period of more than 5 years to enable a development to be completed.</p> <p>The Draft Plan does not stipulate that the lifetime of a permitted solar development should be a particular length. Not specifying such a length allows the planning authority flexibility when attaching conditions to the grant of solar developments in line with best practice for these types of development, particularly given that no Section 28 Guidelines have been issued in relation to this form of development.</p>

<p>KE-C1-375 Southern Region Waste Management Office</p>	<p>The submission suggests that references are updated to the most recently published guidelines, Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects, published in 2021.</p>	<p>The Guidelines referred to in the submission were published by the EPA. The Council is committed to implementing all national guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000, as amended, including future guidelines or amendments to existing guidelines, where appropriate in the performance of its duties, following their adoption.</p> <p>However, it is not necessary to list all Guidelines issued by other authorities in the Development Plan.</p>
<p>KE-C1-221 jane Dennehy</p>	<p>This submission to amending Section 1.5.6.4 and Dependent Relative Accommodation. The submission seeks the inclusion of the following wording: The reuse of an existing structure within the curtilage of the main dwelling may be considered by the Council where an adequate standard of accommodation can be demonstrated.</p>	<p>Point made is noted. Under Performance-based criteria, section 1.4.1 of the Development Management Standards Chapter, it is already stated that <i>The council may consider applying flexibility in the application of development standards where performance-based criteria appropriate to the location result in high-quality design outcomes. For example, exceptions to prescribed standards set out in various guidelines may be considered in relation to the redevelopment of brownfield/regeneration sites. Flexibility will only be permissible in response to well-designed development proposals.</i></p> <p>In addition, please note that the Development Plan states that the principle of mews development will generally be acceptable where there is adherence to the qualitative and quantitative standards set out in this chapter.</p> <p>Therefore, the Development Plan does allow for the potential to consider alternative solutions to Dependent Relative Accommodation on a case-by-case basis.</p>
<p>Recommendations Ornithological (bird) survey (winter and breeding) for at least 2 years prior to a planning application being made. <i>As part of this, the Irish Hen Harrier Winter Survey (IHHWS) should be consulted with in relation to Hen Harrier Winter Roost locations.</i></p>		

<p>Volume 6 – Other Documents - 2. Land-Use Zoning –Local Area Plans (LAPs)</p>		
	<p>Submission Summaries</p>	<p>CE Response and Recommendations</p>
<p>Tralee MD LAP</p>		
<p>KE-C1-366 Kane Williams Architects</p>	<p>Fenit The submission requests the removal of a portion of the land from the Rural Areas Under Urban Influence designation in order to allow for the provision of accommodation and Maritime educational training facilities along the new greenway route.</p>	<p>The submission relates to lands located in Fenit which are zoned in the Tralee Municipal District Local Area Plan 2018-2024 and to lands immediately outside of the development boundary.</p> <p>It is envisaged that the development potential for the area and in particular for zoned land will shortly increase with the opening of the Tralee to Fenit Greenway and Irish Waters planned upgrade to the waste water treatment plant.</p>

		<p>The submission highlights the potential development of an amenity area, across the lands that are zoned and the lands immediately outside the settlement boundary.</p> <p>All areas outside settlement boundaries are zoned as one of three rural area types. This zoning applies to rural housing only and would not form part of the assessment for a proposal as outlined in the submission. It is not necessary therefore to amend the rural area's type maps.</p>
KE-C1-349 Neil Fitzgibbon	This submission requests that land currently zoned as residential and active open space in Fenit is retained on the site.	No change recommended , The subject lands are located within the Tralee MD LAP and do not form part of the CDP Process.
KE-C1-58 Yvonne and Jerry Carmody	This submission requests that a site to the rear of Radharc Na Cuin, Knockanish, The Spa, Tralee is zoned residential.	The submission relates to lands located outside of the Tralee town boundary and contained in the Tralee Municipal District Local Area Plan 2018-2024 and therefore cannot be considered.
KE-C1-23 Noel McSweeney	This submission requests the rezoning of lands (currently zoned P1 Agriculture and G1 Open Space/Park under the Tralee M.D. LAP 2018-2024) to residential.	The submission relates to lands located outside Ardfert and contained in the Tralee Municipal District Local Area Plan 2018-2024 and therefore cannot be considered.
KE-C1-6 Alan Collins	We respectively request that consideration be given for the re-zoning of lands located adjacent to Lios Ard, Lisloose, Tralee for residential development to serve the town. This land is ideally located with suitable access to the public road and to all services in the local area.	The submission relates to lands located outside of the Tralee town boundary and contained in the Tralee Municipal District Local Area Plan 2018-2024 and therefore cannot be considered.
KE-C1-361 James Brosnan	This submission relates to land use zoning and submission ref. no. KE-C1-6 and ownership of the lands in question.	The submission cannot be considered.
KE-C1-59 Gerard griffin	This submission requests that KCC consider rezoning the site at No.8 Cahir Airde, Ballygarron, The Spa for residential use and that the developer could build a house on the site and try and get the estate complete once and for all.	The submission relates to lands located outside of the Spa settlement boundary and contained in the Tralee Municipal District Local Area Plan 2018-2024 and therefore cannot be considered.
KE-C1-335 Jeremy Walsh Project Management	<p>Unfinished Dromcairn Estate , Camp. Tralee.</p> <p>The submission requests that 13 serviced sites be placed on a register of sites within unfinished estates and therefore that the Planning Authority would look favourably upon granting permission in order to complete the development, subject to the standard planning guidelines and conditions.</p>	<p>The submission relates to lands located outside of the Tralee town boundary and contained in the Tralee Municipal District Local Area Plan 2018-2024 and therefore cannot be considered for zoning purposes.</p> <p>In relation to unfinished estates, it is the policy of the Council to address the issue of unfinished housing estates in the County by implementing the guidance manual Managing and Resolving Unfinished Housing Developments (DoECLG 2011). Given the planning history of the site, the number of dwellings in the development already occupied and the provision of services it is envisaged that this legacy can be dealt with in the next Tralee MD Plan.</p>

KE-C1-78 Davan Developments Ltd	The Re-zoning of lands at Camp Ballyseedy, Tralee County Kerry for the purposes of residential development. The author states that the proposed site for re-zoning is part of an unfinished housing estate.	The submission relates to lands located outside of the Tralee town boundary and contained in the Tralee Municipal District Local Area Plan 2018-2024 and therefore cannot be considered.
KE-C1-168 O Connell Family	The submission requests that land as indicated in the documentation attached to the submission be zoned for residential purposes at Killeen, Tralee	The submission relates to lands located outside Tralee boundary and contained in the Tralee Municipal District Local Area Plan 2018-2024 and therefore cannot be considered
KE-C1-117 Diane Crean	The submission requests that land at Camp Ballyseedy Tralee as per the attachment with the submission for the purposes of residential development	The submission relates to lands located outside Tralee boundary and contained in the Tralee Municipal District Local Area Plan 2018-2024 and therefore cannot be considered
KE-C1-356 Circle K Ireland Energy Group Limited	The submission seeks inclusion of the service station within the Tralee development boundary and zoned as 'Mixed Use (M3) – District/Neighbourhood Centre'	The submission relates to lands located outside Tralee boundary and contained in the Tralee Municipal District Local Area Plan 2018-2024 and therefore cannot be considered.
KE-C1-72 Alan Boyle	Retain residential use for lands at Roscartan, Ballycarty, Tralee. Planning ref 11/718.	It is an objective of the plan (KCDP 5-15) to seek/ ensure the completion of existing residential and cluster type developments throughout the county.
KE-C1-367 McCutcheon Halley	The submission requests the re-zoning of land at Caherweesheen for residential use.	The submission relates to lands located outside of the Tralee Town Boundary and contained in the Tralee Municipal District Local Area Plan 2018-2024 and therefore cannot be considered. Notwithstanding the above, from a sequential approach, these lands are located some distance (2.2km) from the town centre (Square). It is considered that there are far more suitable lands closer to the town centre that have potential to be developed for residential use.
Killarney MD LAP		
KE-C1-73 Sean Mac Carthy	To recognize the residential use of the authors land in land use maps for Killarney town	The Lands in question are outside the boundary of Killarney town and therefore cannot be considered
KE-C1-427 Freddie Bartlett	Requests that lands at Barraduff, Killarney are rezoned residential.	The land in question is located outside Killarney town boundary, and therefore cannot be considered
KE-C1-284 Healy Family	Lands at Farranaspig , Killarney The submission seeks that the site zoning be changed from special secondary amenity to rural general, or any new category of zoning proposed in the draft County Development Plan, which will allow for family members to obtain planning permission on family-owned land which has been in family ownership for generations.	The submission relates to lands designated as a visually sensitive area in the Draft Plan (see Map K). Visually sensitive landscapes are particularly notable by virtue of their scenic and visual quality and offer significant opportunities for tourism development and rural recreational activities. The Council seeks to ensure that a balance is achieved between the protection of sensitive landscapes and the appropriate socio-economic development of these areas. <u>Development is not precluded in visually</u>

		sensitive landscapes; however, development proposals will be required to demonstrate that they integrate and respect the visual quality of the landscape.
KE-C1-331 Jeremy Walsh Project Management	The submission seeks to include land at Killahane, Fieries, within the Fieries settlement boundary and to be zoned as 'Industrial, Enterprise and Employment' as it is adjacent to the Kerry Food Hub.	The submission relates to lands located outside of the Fieries settlement boundary and contained in the Killarney Municipal District Local Area Plan 2018-2024 and therefore cannot be considered.
KE-C1-162 Eoghan Mac Sweeny	the submission request that the land as shown in the attachment that accompanies the submission be zoned for residential development at Farranfore	The submission relates to lands located in Farranfore and contained in the Killarney Municipal District Local Area Plan 2018-2024 and therefore cannot be considered
KE-C1-17 Donal O'Donoghue	This submission requests that lands at Farranaspig, Aghadoe, Killarney are rezoned from G3 - Landscape Protection (Killarney Environs Zoning Map A) to Rural General as the landowner would like to accommodate housing for family members (the O Donoghue/Healy families).	The submission relates to lands located outside Killarney boundary and contained in the Killarney Municipal District Local Area Plan 2018-2024 and therefore cannot be considered.
KE-C1-422 Paraic O'Donoghue	This submission calls for the Zoning of Lands at Dromhumper, Killarney to be zoned P1 Agriculture.	The submission relates to lands located outside Killarney boundary and contained in the Killarney Municipal District Local Area Plan 2018-2024 and therefore cannot be considered.
KE-C1-128 John Brosnan	The submission requests that the residential zoning at the submitter's lands at Castleisland be extended to the rest of their land holdings as per the maps attached to the submission	The submission relates to lands located in Castleisland and contained in the Killarney Municipal District Local Area Plan 2018-2024 and therefore cannot be considered.
KE-C1-101 Sean O'Mahony KE-C1-424 Sean O'Mahony	The submission requests that land at Faha East, Killarney, Co. Kerry as per the attachment for the purposes of Residential Development.	<p>Faha is classified as a small village settlement in the Settlement Hierarchy (Table 3.6). It is the policy of the Council to seek to strengthen and diversify rural towns and villages to be a focus for local housing. It is also an objective of this plan to permit clusters of housing served by (existing or proposed) individual wastewater treatment systems in the small villages and small village settlements listed in Table 5.1 (which includes Faha) where there is no wastewater infrastructure or no plans for such infrastructure. The strategy for these clusters within these settlements is to facilitate a small number of additional dwellings and/or small enterprises to consolidate the existing pattern of development around these focal points and utilise existing services in the area.</p> <p>The Development Plan is not defining a settlement boundary for small village settlements, nor is it zoning land in settlements. Settlement boundaries for small village settlements will be undertaken as part of the local area plan process. It is the policy of the council to consolidate the existing pattern of development around these focal points and utilise</p>

		existing services in the area. Any such development will therefore have to consolidate a settlement rather than result in an extension or enlargement of suburban type development into the countryside.
Listowel MD LAP		
KE-C1-24 Noel Hillard	This submission requests that lands currently rural general outside the Listowel Town boundary are zoned residential.	The submission relates to lands located outside Listowel town and contained in the Listowel Municipal District Local Area Plan 2020-2026 and therefore cannot be considered.
KE-C1-33 Billy O Connell	This submission requests that lands at Dromin Upper, Listowel are zoned residential.	The submission relates to lands located outside the Listowel Town boundary and contained in the Listowel Municipal District Local Area Plan 2020-2026 and therefore cannot be considered.
KE-C1-414 Jim and Samantha Kelly	The submission requests the re-zoning of land from agriculture to residential as it serviced, adjacent to the Listowel town boundary and future bypass, bounded by existing residential development and not subject to flooding.	The submission relates to lands located outside the Listowel Town boundary and contained in the Listowel Municipal District Local Area Plan 2020-2026 and therefore cannot be considered.
KE-C1-334 QDM Architecture	The submission seeks an extension to the Listowel Town Boundary to include the unfinished estate of The Writings which previously had planning permission for 44 units however only 33 units have been completed.	The submission relates to lands located outside of the Listowel Town boundary and therefore contained in the Listowel Municipal District Local Area Plan 2020-2026 and therefore cannot be considered for zoning purposes. In relation to unfinished estates, it is the policy of the Council to address the issue of unfinished housing estates in the County by implementing the guidance manual Managing and Resolving Unfinished Housing Developments (DoECLG 2011). Given the planning history of the site, the number of dwellings in the development already occupied and the provision of services it is envisaged that this legacy can be dealt with in the next Listowel Municipal District Local Area Plan.
KE-C1-220 Pat O' Mahony	The submission seeks the re-zoning of land in Abbeydorney, for it be included within the settlement boundary to allow the owner to apply for planning permission for a single private dwelling house as a permanent residence.	The submission relates to lands located outside of the Abbeydorney village boundary therefore contained in the Listowel Municipal District Local Area Plan 2020-2026, and therefore cannot be considered for inclusion as part of the development plan.
KE-C1-170 Jeremy Walsh Project Management	The submission requests that lands at Abbeydorney Village Co. Kerry that is currently zoned education to part Residential part Educational.	The land in question is located cannot be considered as it is located within the Listowel MD LAP 2020-26. A significant portion of the lands referenced in the submission are zoned residential in the Listowel MD LAP
KE-C1-79 Michael Quilter	The submission seeks a boundary extension and the rezoning of land for residential purposes at the Green Lixnaw. The author states it is to facilitate the completion of an unfinished housing estate.	This issue if a boundary extension and the zoning of additional lands cannot be considered as part of the CDP process

		<p>In relation to unfinished estates, it is the policy of the Council to address the issue of unfinished housing estates in the County by implementing the guidance manual Managing and Resolving Unfinished Housing Developments (DoECLG 2011).</p> <p>it is considered acceptable to include a new objective which supports the completion of Unfinished estates (on residential zoned land), particularly where all services are already in-situ.</p> <p>Recommendation:</p> <p>Please see response to KE-C1-513</p>
KE-C1-36 Angela and Denis Dowling	This submission requests that lands at Doon East, Ballybunion are zoned residential. Please note that no map was attached to this submission.	The submission relates to lands located outside Ballybunion and contained in the Listowel Municipal District Local Area Plan 2020-2026 and therefore cannot be considered.
KE-C1-19 Paul Pierce	This submission requests the proposed inclusion and zoning of Paul Pierce's caravan park in Ballybunion. Zoning requested to be applied is C5 Tourism & Related.	The submission relates to lands located in Ballybunion and contained in the Listowel Municipal District Local Area Plan 2020-2026 and therefore cannot be considered.
KE-C1-15 Desmond O'Driscoll	Submission requests that lands outside of Ballyheigue Village be zoned residential (currently rural general).	The submission relates to lands located outside Ballyheigue and contained in the Listowel Municipal District Local Area Plan 2020-2026 and therefore cannot be considered.
KE-C1-428 Tim McEllistrim	Requests that lands on the edge of Ballylongford village are zoned residential.	The submission relates to lands located outside Ballylongford and contained in the Listowel Municipal District Local Area Plan 2021-2027 and therefore cannot be considered.
Corca Dhuibhne MD LAP		
KE-C1-102 David O'Connor	<p>The submission states that the presence of the public sewer in Brandon was not acknowledged and consequently, in our opinion has resulted in the Local Authority being 'precluded from zoning residential lands' because it incorrectly deemed Brandon to have 'inadequate wastewater treatment'.</p> <p>In respect of the lands that have been zoned, the proposed boundary only encompasses some of the developed lands already in existence within Brandon village which have access to the public sewer, namely a lane comprising seven houses to the south of the village boundary as identified in the current plan.</p>	Brandon is classified as a small village settlement with planning policy including its settlement boundary contained in the Corca Dhuibhne LAP. The zoning of lands in this settlement therefore cannot be considered as part of the CDP process

	The submission seeks the plan to be revised, zoning lands for development which have access to the existing public sewer which has significant capacity to accommodate further development.	
KE-C1-476 Mid-Kerry Co-operative Livestock Mart Ltd	This submission requests that lands at Ballyoughtragh South, Milltown, Co.Kerry are zoned for industrial use.	The submission is noted however it relates to the zoning of lands located in Milltown which are contained in the Corca Dhuibhne EA Local Area Plan 2021-2027 and therefore cannot be considered
KE-C1-146 Delores McGlynn	That land adjacent to the Primary school in Milltown is a field zoned for education and community purposes, we wish that field should be zoned only for education purposes and the county council remove the community zoning from the planning section. There is a plan for 31 houses and medical centre. Also it has been suggesting it could be community housing.	The submission is noted however it relates to the zoning of lands located in Milltown which are contained in the Corca Dhuibhne EA Local Area Plan 2021-2027 and therefore cannot be considered
KE-C1-1 Robert Falvey KE-C1-4 Teresa Leneghan KE-C1-99 Majella Mangan	This submission relates to zoning in Milltown. The field referred to is zoned S5 Mixed/General Community Services/ Facilities Uses in the current Corca Dhuibhne Electoral Area Local Area Plan 2021-2027. The submission suggests that the field adjacent to Nagle Rice Primary school should be kept for educational purposes only and no developments allowed besides educational related facilities and parking. The wording of community should be removed from the development plan for this field.	The submission relates to lands zoned in the Corca Dhuibhne Electoral Area Local Area Plan 2021-2027 and therefore cannot be considered.
West Iveragh MD LAP		
KE-C1-341 Brendan Mangan	The submission requests the inclusion of lands within the Waterville Settlement Boundary in order to accommodate residential development.	The submission relates to lands in Waterville and contained in the West Iveragh Electoral Area Local Area Plan 2019-2025 and therefore cannot be considered.
KE-C1-10 Paul Keating	Residential Zoning - The Cloisters, Spunkane, Waterville	The submission relates to lands located outside Waterville and contained in the West Iveragh Electoral Area Local Area Plan 2019-2025 and therefore cannot be considered.

Future East Iveragh [South Kerry] LAP		
<p>KE-C1-213 Fionán Hickey KE-C1-294 Johnny Healy- Rae KE-C1-287 Johnny Healy- RaeKE-C1-395 Orla SheeranKE- C1-351 Orla SheeranKE-C1- 344 Maureen WalshKE-C1- 169 OHR Developments Ltd Cherryhill Development Ltd</p>	<p>This submission seeks the rezoning of land for residential use in Kilgarvan as the land in question is within the village boundary, it is inside the 50km speed limit, it is a fully serviced site and was previously zoned residential.</p> <p>The submission seeks more zoned land in Kilgarvan and Kenmare for residential use.</p> <p>The submission seeks that more land would be zoned for residential use in Kilgarvan, Kenmare, Sneem, Waterville, Cahersiveen and Killorglin.</p> <p>This submission requests that lands in Kenmare be zoned residential.</p> <p>This submission requests that lands which were previously within the Kenmare Settlement Boundary are re-incorporated into the town boundary.</p> <p>The Submission Requests that 2.28 Ha of land at Banshagh Killorglin be zoned for residential purposes</p>	<p>The areas outlined in the submission would be more appropriately dealt with in the context of the forthcoming East Iveragh LAP which will review land use zonings in Kilgarvan, Kenmare, Killorglin and Sneem.</p> <p>No change Recommended</p> <p>In relation to Waterville and Cahersiveen, these settlements form part of the west Iveragh LAP. The zoning of lands in these settlements in the CDP cannot be considered</p>
<p>Recommendations No Change recommended</p>		

List of Submissions

Reference Number	Name	Organisation/On behalf of
KE-C1-1	Robert Falvey	
KE-C1-3	Corporate Support Unit	Department of Environment, Climate and Communications (DECC)
KE-C1-4	Teresa Leneghan	
KE-C1-5	David Galvin	Environmental Protection Agency (EPA)
KE-C1-6	Stephen Kearney	On Behalf of Alan Collins
KE-C1-7	Michael Williams	On Behalf of Bryan McKenna
KE-C1-8	Pat Lawlor	
KE-C1-9	Tom Kennedy	
KE-C1-10	Frank Curran	On Behalf of Paul Keating
KE-C1-11	Ciarán O'Sullivan	Roadstone Ltd.
KE-C1-12	David Monson	
KE-C1-13	Deirdre Forrest	Irish Aviation Authority
KE-C1-14	Michael Doody	Killarney Salmon & Trout Angling Club
KE-C1-15	Desmond O'Driscoll	
KE-C1-17	John Hickey	On Behalf of Donal O'Donoghue
KE-C1-18	James Griffin	
KE-C1-19	Pat Boyce	On Behalf of Paul Pierce
KE-C1-20	Donard deCogan	
KE-C1-21	Charlie Coakley	Woodlands Equestrian Club and Showground
KE-C1-22	Brendan O'Shea	
KE-C1-23	Stephen Kearney	On Behalf of Noel McSweeney
KE-C1-24	Brendan Nolan	On Behalf of Noel Hillard
KE-C1-25	Denis Walsh	North Kerry Advertiser Ltd
KE-C1-26	Spatial Planning	Irish Water
KE-C1-27	Nuala Corkery	Caragh Lake Conservation Association
KE-C1-28	BRIAN FARRELL	

Reference Number	Name	Organisation/On behalf of
KE-C1-29	alfred jones	Castlecove Community Road Safety Group
KE-C1-30	Dermot Mangan	
KE-C1-31	Patrick Galvin	
KE-C1-32	Brendan O Connell	On Behalf of Bertie Foran
KE-C1-33	Brendan Nolan	On Behalf of Billy O Connell
KE-C1-34	Michael Burke	On Behalf of Gerard griffin
KE-C1-35	Gary Mackin	
KE-C1-36	Angela and Denis Dowling	
KE-C1-37	Denise Collins	
KE-C1-38	Teresa Oshea	
KE-C1-39	Maire Ui Leidhin	Coiste Forbartha na Sceilge & Ballinskelligs Evironmental Action Group (B.E.A.G.)
KE-C1-40	Maire Ui Leidhin	Coiste Forbartha na Sceilge & Ballinskelligs Evironmental Action Group (B.E.A.G.)
KE-C1-41	Brendan O'Callaghan	
KE-C1-42	Sean O'Reilly	
KE-C1-43	Des (Coiste Forbartha na Sceilge) Cronin	Coiste Forbartha na Sceilge
KE-C1-44	billy Nolan	
KE-C1-45	Brendan O'Shea	
KE-C1-46	Cllr. Charlie Farrelly	
KE-C1-47	Nial Murphy	On Behalf of Edmond & Ian Cahill
KE-C1-48	Keep Ireland Open KIO	Keep Ireland Open
KE-C1-49	Marie Moloney	
KE-C1-50	Brendan Danaher	
KE-C1-51	Peadar O Fionnáinn	
KE-C1-52	Catherine White	
KE-C1-53	Fred O'Sullivan	
KE-C1-54	Samuel Moriarty	
KE-C1-55	Mélanie Queyroulet Baudo	
KE-C1-56	Des (Coiste Forbartha na Sceilge) Cronin	Coiste Forbartha na Sceilge

Reference Number	Name	Organisation/On behalf of
KE-C1-57	Majella Daly	HSE
KE-C1-58	James Sugrue	On Behalf of Yvonne and Jerry Carmody
KE-C1-59	Michael Burke	On Behalf of Gerard griffin
KE-C1-60	Ita O Donnell	
KE-C1-61	David Trant and Kenneth O Connell	North Kerry Biogas Farmers Association
KE-C1-62	Seamus Fleming	
KE-C1-63	Alannah Hurley	Homeland DAL Ltd.
KE-C1-64	Cllr. Donal Grady	
KE-C1-65	Michael Casey	
KE-C1-66	Land Use Planning Unit Transport Infrastructure Ireland	Transport Infrastructure Ireland
KE-C1-67	Dan Smyth	Knockaderry National School Board of Management,
KE-C1-68	Dan Smyth	
KE-C1-69	Joe Harrington	Lyreacrompane Heritage Group
KE-C1-70	Catherine White	
KE-C1-71	MJ Kearney	
KE-C1-72	Michael Burke	On Behalf of Alan Boyle
KE-C1-73	Sean Mac Carthy	
KE-C1-74	Barry O'Donoghue	Irish Hen Harrier Winter Survey
KE-C1-75	Paul Mc Sweeney	
KE-C1-76	Paul Mc Sweeney	
KE-C1-77	Helen O'Carroll	
KE-C1-78	Liam Davis	Davan Developments Ltd
KE-C1-79	Michael Quilter	
KE-C1-80	Karol Kissane	Kerry IFA
KE-C1-81	Ian Crowley	
KE-C1-82	Robert Fennelly	Southern Regional Assembly
KE-C1-83	Peter Browne	

Reference Number	Name	Organisation/On behalf of
KE-C1-84	Niall Marshall	
KE-C1-85	Niall Marshall	
KE-C1-86	Jane Murphy	Woodlands Caravan Park
KE-C1-87	Pat Carey	
KE-C1-88	mary mahony	
KE-C1-89	mary mahony	
KE-C1-90	mary mahony	
KE-C1-91	mary mahony	
KE-C1-92	mary mahony	
KE-C1-93	mary mahony	
KE-C1-94	mary mahony	
KE-C1-95	mike casey	
KE-C1-96	Matthew Hopper	Fenit Community Network
KE-C1-97	Maria O'Shea	
KE-C1-98	Maria O'Shea	
KE-C1-99	Majella Mangan	
KE-C1-100	Céline Lavelle	
KE-C1-101	Donagh O'Regan	On Behalf of Sean O'Mahony
KE-C1-102	Warren Reidy	On Behalf of David O'Connor
KE-C1-103	Brid Cody	CIF
KE-C1-104	Michael Slattery	Dromjam Limited
KE-C1-105	Niamh Hardiman	
KE-C1-106	Heather McMeel	An Post
KE-C1-107	John O'Sullivan	
KE-C1-108	Liam & Mary Scully	
KE-C1-109	Tadhg Casey	On Behalf of Tina and Barry Godley
KE-C1-110	Fionan McCarthy	JOAM Consulting Ltd
KE-C1-111	Deirdre de Bhailís	Mol Teic (t/a Dingle Hub)

Reference Number	Name	Organisation/On behalf of
KE-C1-112	Cathal Costello	PSA Sugrue
KE-C1-113	Sinead O'Malley	FuturEnergy Ireland
KE-C1-114	Denis Michael Galvin	
KE-C1-115	RICHARD FORAN	
KE-C1-116	Johnnoel McCarthy	
KE-C1-117	Diane Crean	
KE-C1-118	Seamus Lynch	
KE-C1-119	Martin Leane	Lyreacrompane Community Development
KE-C1-120	Michelle Carmody	
KE-C1-121	Patrick Walsh	
KE-C1-122	mary mahony	
KE-C1-123	mary mahony	
KE-C1-124	mary mahony	
KE-C1-125	Ruary Rudd	
KE-C1-126	Eoin OConnor	MWP
KE-C1-127	Farranfore Development Association	Farranfore Development Association
KE-C1-128	Eoghan McGillicuddy	On Behalf of John Brosnan
KE-C1-129	Peter Murphy	
KE-C1-130	Karen Donovan	Office of Public Works
KE-C1-131	John Prendergast	Tobar Dhuibhne - Plean Teanga Chiarraí Thiar
KE-C1-132	thomas staehlin	
KE-C1-133	Linda Edwards	
KE-C1-134	John Fox	
KE-C1-135	Linda Edwards	
KE-C1-136	Michael O Hanlon	
KE-C1-137	Liam Geary	
KE-C1-138	ClIr. Michael Cahill	
KE-C1-139	Patrick O Donoghue (Sen)	

Reference Number	Name	Organisation/On behalf of
KE-C1-140	Fred O Sullivan	
KE-C1-141	Jake Fleming	
KE-C1-142	Fiona Fleming	
KE-C1-143	Alicia Heapes	
KE-C1-144	Breada Heapes	
KE-C1-145	Caroline Toal	Kerry PPN
KE-C1-146	Delores McGlynn	
KE-C1-147	Joan Murphy	Tarbert Development Association
KE-C1-148	Eibhlín Gleeson	
KE-C1-149	Chris Jones	
KE-C1-150	Norma Guerin	
KE-C1-151	Tim Culloty	
KE-C1-152	Conor Culloty	
KE-C1-153	Brenda Culloty	
KE-C1-154	Joan Heapes	
KE-C1-155	Shauna Heapes	
KE-C1-156	Shauna Guerin Crowley	
KE-C1-157	Joan O Connell	
KE-C1-158	John O Connell	
KE-C1-159	Brian Coffey	
KE-C1-160	Denise Gallagher	
KE-C1-161	Helen O'Carroll	
KE-C1-162	Eoghan Mac Sweeny	
KE-C1-163	John Barrett	
KE-C1-164	Noel Lynch	Ballylongford Enterprise Association
KE-C1-165	Kate Carmody	
KE-C1-166	Niamh Daly	
KE-C1-167	Linda Edwards	

Reference Number	Name	Organisation/On behalf of
KE-C1-168	Ger O Keeffe	On Behalf of O Connell Family
KE-C1-169	Tricia O'Sullivan	OHR Developments Ltd Cherryhill Development Ltd
KE-C1-170	William Casey	Jeremy Walsh Project Management
KE-C1-171	Eoin Kennedy	Asdee Community Development Association
KE-C1-172	Paul Mc Sweeney	
KE-C1-173	Stewart Stephens	Milltown Community and Chamber Alliance
KE-C1-174	James Redmond	BayWa r.e. Ireland
KE-C1-175	Ruary Rudd	
KE-C1-176	John G Borgeat	
KE-C1-177	Claire O Sullivan	
KE-C1-178	Brendan Nolan	On Behalf of Billy Sheehy
KE-C1-179	Pádraig de Brún	
KE-C1-180	Mairead Connelly	
KE-C1-181	Robert McLoughlin (on behalf of Tesco Ireland Limited)	Avison Young (on behalf of Tesco Ireland Limited)
KE-C1-182	Steve Edwards	
KE-C1-183	Alan O' Connell	Local Link Kerry
KE-C1-184	Steve Edwards	
KE-C1-185	Eamonn Sayers	
KE-C1-186	Eamonn Sayers	
KE-C1-187	mary mahony	
KE-C1-188	Colette O'Connor	Tralee Chamber Alliance
KE-C1-189	Marie Moloney	
KE-C1-190	John O'Grady	
KE-C1-191	Marie Moloney	
KE-C1-192	Amy Rudd	
KE-C1-193	Marie Moloney	
KE-C1-194	Alan Morris	

Reference Number	Name	Organisation/On behalf of
KE-C1-195	Caroline Hurley	
KE-C1-196	James Brennan	
KE-C1-197	Aoife Power	
KE-C1-198	Steve Edwards	
KE-C1-199	John Sheehy	Dingle Business Chamber
KE-C1-200	Amy Rudd	
KE-C1-201	Diane Crean	
KE-C1-202	Todhchaí na Tuaithe	Todhchaí na Tuaithe
KE-C1-203	Todhchaí na Tuaithe	Todhchaí na Tuaithe
KE-C1-204	Tim o'SULLIVAN	
KE-C1-205	Todhchaí na Tuaithe	Todhchaí na Tuaithe
KE-C1-206	Paudie Lynch	
KE-C1-207	John Prendergast	
KE-C1-208	Todhchaí na Tuaithe	Todhchaí na Tuaithe
KE-C1-209	Padraig O Suilleabhain	
KE-C1-210	Fiona O'Sullivan	
KE-C1-211	Steve Edwards	
KE-C1-212	Caroline O'Connor	Ballylongford GAA Club
KE-C1-213	Fionán Hickey	
KE-C1-214	Britta Thiemt	Not Here Not Anywhere
KE-C1-215	Joe Langan	Shannon Rangers
KE-C1-216	Michael McEnery	
KE-C1-217	Eoghan Harris	Future generations kerry
KE-C1-218	Aidan Linnane	
KE-C1-219	Aidan Linnane	
KE-C1-220	Stephen Kearney	On Behalf of Pat O' Mahony
KE-C1-221	Orla O'Sullivan	On Behalf of jane Dennehy
KE-C1-222	Siobhan SiobhanOS	Screen Kerry

Reference Number	Name	Organisation/On behalf of
KE-C1-223	John Willoughby	EDF Renewables Ireland
KE-C1-224	Jimmy Green	Stacks Mountain Windfarm Ltd.
KE-C1-225	HW Planning	Portal Asset Holdings Ltd.
KE-C1-226	Stephen Prendiville	Killokrim/Finuge Fishing Club
KE-C1-227	Liam & Mary Scully	
KE-C1-228	Aine Ui Dhubhshlaine	
KE-C1-229	Oidhrecht Chorca Dhuibhne	Oidhrecht Chorca dhuibhne
KE-C1-230	Caitlín Breathnach	Tascfhórsa Uíbh Ráthaigh
KE-C1-231	Gerald McEnery	MacGillycuddy Reeks Mountain Access Forum
KE-C1-232	Manager DAU	Department of Housing, Local Government and Heritage
KE-C1-233	Sean de Buitlear	SKDP
KE-C1-234	Deirdre Horgan	
KE-C1-235	Maura Healy-Rae	
KE-C1-236	Michael O'Shea	
KE-C1-237	Michael O'Shea	
KE-C1-238	Johnny Healy-Rae	
KE-C1-239	Johnny Healy-Rae	
KE-C1-240	Eddie Keane	
KE-C1-241	Johnny Healy-Rae	
KE-C1-242	Maura Healy-Rae	
KE-C1-243	Maura Healy-Rae	
KE-C1-244	Maura Healy-Rae	
KE-C1-245	Maura Healy-Rae	
KE-C1-246	Noel Lynch	Ballylongford Enterprise Association
KE-C1-247	Maura Healy-Rae	
KE-C1-248	Paula Kelleher	Corex Consultancy Ltd
KE-C1-249	John Whelan	
KE-C1-250	Maura Healy-Rae	

Reference Number	Name	Organisation/On behalf of
KE-C1-251	Maura Healy-Rae	
KE-C1-252	Maura Healy-Rae	
KE-C1-253	Maura Healy-Rae	
KE-C1-254	Johnny Healy-Rae	
KE-C1-255	Maura Healy-Rae	
KE-C1-256	Maura Healy-Rae	
KE-C1-257	Johnny Healy-Rae	
KE-C1-258	Maura Healy-Rae	
KE-C1-259	Maura Healy-Rae	
KE-C1-260	John Whelan	
KE-C1-261	Noel Lynch	Ballylongford Enterprise Association
KE-C1-262	Maura Healy-Rae	
KE-C1-263	Maura Healy-Rae	
KE-C1-264	Johnny Healy-Rae	
KE-C1-265	Maura Healy-Rae	
KE-C1-266	Maura Healy-Rae	
KE-C1-267	Maura Healy-Rae	
KE-C1-268	Maura Healy-Rae	
KE-C1-269	QDM Architecture	QDM Architecture
KE-C1-270	Johnny Healy-Rae	
KE-C1-271	Maura Healy-Rae	
KE-C1-272	Johnny Healy-Rae	
KE-C1-273	Maura Healy-Rae	
KE-C1-274	Johnny Healy-Rae	
KE-C1-275	Johnny Healy-Rae	
KE-C1-276	Maura Healy-Rae	
KE-C1-277	Orla Ní Shithigh	
KE-C1-278	Johnny Healy-Rae	

Reference Number	Name	Organisation/On behalf of
KE-C1-279	Yvonne Jackson	Fáilte Ireland
KE-C1-280	Maura Healy-Rae	
KE-C1-281	Johnny Healy-Rae	
KE-C1-282	Maura Healy-Rae	
KE-C1-283	Johnny Healy-Rae	
KE-C1-284	Barth Warren	On Behalf of Healy Family
KE-C1-285	Maura Healy-Rae	
KE-C1-286	Maura Healy-Rae	
KE-C1-287	Johnny Healy-Rae	
KE-C1-288	Maura Healy-Rae	
KE-C1-289	Brian HARDING	
KE-C1-290	Noel Lynch	Ballylongford Enterprise Association
KE-C1-291	Johnny Healy-Rae	
KE-C1-292	Johnny Healy-Rae	
KE-C1-293	Clíodhna Ní Bheaglaoich	
KE-C1-294	Johnny Healy-Rae	
KE-C1-295	Johnny Healy-Rae	
KE-C1-296	Maura Healy-Rae	
KE-C1-297	Dingle Peninsula Tourism Alliance	Dingle Peninsula Tourism Alliance
KE-C1-298	Johnny Healy-Rae	
KE-C1-299	Johnny Healy-Rae	
KE-C1-300	Eoin OConnor	MWP
KE-C1-301	Maura Healy-Rae	
KE-C1-302	Thomas Morelli	
KE-C1-303	Michael Leahy	Old Road Partnership
KE-C1-304	Eoin OConnor	MWP
KE-C1-305	Cathy Donoghue	
KE-C1-306	Danny Healy-Rae	

Reference Number	Name	Organisation/On behalf of
KE-C1-307	Maura Crean	On Behalf of Vincent Crean
KE-C1-308	Danny Healy-Rae	
KE-C1-309	Susan Ní Churnáin	Údarás na Gaeltachta
KE-C1-310	Paudie Se	CFCO
KE-C1-311	Danny Healy-Rae	
KE-C1-312	Mary O'Connor	Dromclough NS
KE-C1-313	Danny Healy-Rae	
KE-C1-314	Danny Healy-Rae	
KE-C1-315	Danny Healy-Rae	
KE-C1-316	Eoin O Leithin	Gluaiseacht
KE-C1-317	Danny Healy-Rae	
KE-C1-318	Danny Healy-Rae	
KE-C1-319	Aine O' Donoghue	Social Action Group Rathmore
KE-C1-320	Steve McCarthy	Harmony Solar Ireland Limited
KE-C1-321	Sara Tinsley	Energia Renewables
KE-C1-322	Steve Edwards	
KE-C1-323	James Dunne	Iarnród Éireann / Irish Rail
KE-C1-324	Environmental Co-Ordination Unit	Department of Agriculture, Food & the Marine
KE-C1-325	Michael Horan	Scartaglin Wind Awareness Group
KE-C1-326	Marie Moloney	
KE-C1-327	Marie Moloney	
KE-C1-328	Eimear Kelleher	The Arts Council / An Chomhairle Ealaíon
KE-C1-329	Sinéad O Donoghue	Land Development Agency
KE-C1-330	Colm Cummins	Electricity Supply Board
KE-C1-331	William Casey	Jeremy Walsh Project Management
KE-C1-332	Michael Lyne	Valentia Island Dev Co Limited by guarantee
KE-C1-333	Ian Brosnan	On Behalf of Maurice Coffee
KE-C1-334	QDM Architecture	QDM Architecture

Reference Number	Name	Organisation/On behalf of
KE-C1-335	William Casey	Jeremy Walsh Project Management
KE-C1-336	jimmy Moloney	
KE-C1-337	Rosalie Scanlon	
KE-C1-338	Danny Healy-Rae	
KE-C1-339	Paul Lynch	
KE-C1-340	Michael Dineen	On Behalf of Alexander Kelly
KE-C1-341	Albert Walsh	On Behalf of Brendan Mangan
KE-C1-342	Caoimhín Ó Cadhla	Conradh na Gaeilge
KE-C1-343	martin moriarty	
KE-C1-344	Maureen Walsh	
KE-C1-345	Robert O'Connor	
KE-C1-346	Ashley Champion	Kerry Green Party
KE-C1-347	Oengus Skehan	
KE-C1-348	Lucian Horvat	
KE-C1-349	Stephen Kearney	On Behalf of Neil Fitzgibbon
KE-C1-350	Tomas Bradley	EirGrid Group PLC.
KE-C1-351	Orla Sheeran	
KE-C1-352	T Ní Mhainín	
KE-C1-353	CorporateSupport Unit	Department of Environment, Climate and Communications
KE-C1-354	Chantal Shiels	
KE-C1-355	Cristín de Mórdha	Dúchas an Daingin
KE-C1-356	Alannah Hurley	Circle K Ireland Energy Group Limited
KE-C1-357	HW Planning	HW Planning
KE-C1-358	Brenadán Fitzgerald	
KE-C1-359	Alannah Hurley	Circle K Ireland Energy Group Limited
KE-C1-360	Brian Morgan	Atlantic Villa
KE-C1-361	James Brosnan	
KE-C1-362	Danny Healy-Rae	

Reference Number	Name	Organisation/On behalf of
KE-C1-363	Éamonn O'Reilly	NEWKD
KE-C1-364	Liam Hayes	Cromane Community Council
KE-C1-365	Seán Woods	Office of the Planning Regulator
KE-C1-366	Cormac Kane	Kane Williams Architects
KE-C1-367	Emma Barry	McCutcheon Halley
KE-C1-368	Adrian Sheehan	Adrian Sheehan
KE-C1-369	Peter Malone	
KE-C1-370	M Shanahan	
KE-C1-371	Michelle O'Shea	Ruden Homes Ltd.
KE-C1-372	Michael Dineen	On Behalf of James Dineen
KE-C1-373	Jerry Mac Evilly	Friends of the Earth
KE-C1-374	Peter Malone	
KE-C1-375	Margaret Murphy	Southern Region Waste Management Office
KE-C1-376	Fiona Lyne	
KE-C1-377	Cristín de Mórdha	
KE-C1-378	CorporateSupport Unit	Department of Environment, Climate and Communications
KE-C1-379	M Shanahan	
KE-C1-380	MARTIN MULVIHILL	
KE-C1-381	Mairead O Sullivan	North Kerry Football Board
KE-C1-382	Martin Brosnan	The Kerry Food Hub
KE-C1-383	Mary Carney	Department of Education
KE-C1-384	Yvonne Murphy	SSE plc
KE-C1-385	Cllr Jackie Healy-Rae	
KE-C1-386	Catriona Power	Circular Bioeconomy Cluster South-West
KE-C1-387	Art Ó Laoghaire	
KE-C1-388	John McElligott	Safety Before LNG
KE-C1-389	Michael MacAree	National Transport Authority
KE-C1-390	Leonard Hobbs	Valentia Transatlantic Cable Foundation

Reference Number	Name	Organisation/On behalf of
KE-C1-391	anita McKeown	Cahersiveen Community and Business Alliance
KE-C1-392	Denis Devane	Wind Energy Ireland
KE-C1-393	Victor Bayda	Brí Uíbh Ráthaigh - Plean Teanga Chiarraí Theas, ceanneagraíocht - Comhchoiste Ghaeltacht Uíbh Ráthaigh
KE-C1-394	Michael O Sullivan	
KE-C1-395	Orla Sheeran	
KE-C1-396	Bernie O Donoghue	
KE-C1-397	M Beasley	North Kerry Environmental Forum /Association
KE-C1-398	Irene Hartigan	
KE-C1-399	James Fogarty	
KE-C1-400	Adrian Collins	
KE-C1-401	Brendan Horgan	
KE-C1-402	Brendan O Grady	
KE-C1-403	Bridget Carmody	
KE-C1-404	Bridget Reidy	
KE-C1-405	Scartaglin Region Wind Energy Multiple Submissions	
KE-C1-406	Scartaglin Region Wind Energy Multiple Submissions	
KE-C1-407	Cathal Horan	
KE-C1-408	Catherine & Phil Sheehy	
KE-C1-409	Clementine O'Keefe	
KE-C1-410	Crainn Chiarraí	Crainn Chiarraí
KE-C1-411	Frank Quilter	
KE-C1-412	J & Patrice Houlihan and Mengen	
KE-C1-413	Hugh and Jean Campbell	
KE-C1-414	John Hegarty	On Behalf of Jim and Samantha Kelly
KE-C1-415	Gerry Coakley	
KE-C1-416	Linda and John Edwards and Grady	

Reference Number	Name	Organisation/On behalf of
KE-C1-417	Louise and Cornelius Carey and O'Gorman	
KE-C1-418	Donal Mangan	Castlemaine Harbour Co-Operative Society TTD
KE-C1-419	Marianne Browne	
KE-C1-420	Mary Behan	
KE-C1-421	Mary O'Shea	Killarney Access Group
KE-C1-422	Paraic O'Donoghue	
KE-C1-423	Donal Mangan	Castlemaine Harbour Co-Operative Society TTD
KE-C1-424	Sean O'Mahony	
KE-C1-425	Patrick J. Gilbert	
KE-C1-426	John Hegarty	On Behalf of Shaun Hegarty
KE-C1-427	Donal Moynihan	On Behalf of Freddie Bartlett
KE-C1-428	Kevin Kenneally	On Behalf of Tim McEllistrim
KE-C1-429	Tom McElligott	
KE-C1-430	William Dore	
KE-C1-431	Máiréad Ní Chaomhánaigh de hOra	
KE-C1-432	Padraig Griffin	
KE-C1-433	Linda Edwards	Lixnaw Wind Aware Group, Luachra wind awarness group, Tullamore action Group, North Kerry Wind Turbine Awareness Group
KE-C1-434	Rose Wall	Listowel Business & Community Alliance
KE-C1-435	Catherine Horgan	
KE-C1-436	Greta Maher	
KE-C1-437	Hanora Morrin	
KE-C1-438	Helen Murphy Stack	
KE-C1-439	Jake Heffernan	
KE-C1-440	James Keane	
KE-C1-441	Jeremiah Kirby	
KE-C1-442	John Horgan	
KE-C1-443	John Kelly	

Reference Number	Name	Organisation/On behalf of
KE-C1-444	John Quirke	Micheal F Quirke & Sons
KE-C1-445	Seosaimhin Ni Beaglaioich	
KE-C1-446	John O Keeffe	
KE-C1-447	Martin Ahern	Shannon LNG
KE-C1-448	Chris O Sullivan	
KE-C1-449	Dan Cronin	
KE-C1-450	Denis Collins	
KE-C1-451	Denise Carroll	
KE-C1-452	Edmund McSweeney	
KE-C1-453	Gillian Collins	
KE-C1-454	Jimmy Buckley	
KE-C1-455	John Doody	
KE-C1-456	John Sullivan	
KE-C1-457	Julia Shea	
KE-C1-458	Katherine Carroll	
KE-C1-459	Mandy Carroll	
KE-C1-460	Marie Cawley	
KE-C1-461	Mary Cronin	
KE-C1-462	Mary O Connor	
KE-C1-463	Michael Coakley	
KE-C1-464	Michael Herlihy	
KE-C1-465	Nicola Doody	
KE-C1-466	Noirin Herlihy	
KE-C1-467	Pa Fitzgerald	
KE-C1-468	Paddy O Rourke	
KE-C1-469	Patrick Bradley	
KE-C1-470	Richard Brosnan	
KE-C1-471	Robert Carroll	

Reference Number	Name	Organisation/On behalf of
KE-C1-472	Sean Gallagher	
KE-C1-473	Sean O'Brien	
KE-C1-474	Shane Brosnan	
KE-C1-475	Tom Doody	
KE-C1-476	Donal Counihan	Mid-Kerry Co-operative Livestock Mart Ltd
KE-C1-477	Todhchaí na Tuaithe	Todhchaí na Tuaithe
KE-C1-478	Tony Lowes	Friends of the Irish Environment
KE-C1-479	Joseph Heffernan	
KE-C1-480	Kathleen Keane	
KE-C1-481	Kayleigh Sheehy	
KE-C1-482	niamh ní dhúill	Transition Kerry
KE-C1-483	Kieran and Nora Murphy	
KE-C1-484	John Phelan	Tulfarris CG Ltd
KE-C1-485	stop wind turbines	
KE-C1-486	Liam and Liliy Kirby	
KE-C1-487	Karen Costello	
KE-C1-488	willie Dillane	
KE-C1-489	Lucy Kelly	
KE-C1-490	Veronica moloney	
KE-C1-491	Tracey Horan	
KE-C1-492	Tony Maher	
KE-C1-493	Timmy Dillane	
KE-C1-494	Luke O Keeffe	
KE-C1-495	M Keane	
KE-C1-496	Thomas McNamara	
KE-C1-497	Siobhan Kelly	
KE-C1-498	Margaret Heffernan	
KE-C1-499	Mary Horgan	

Reference Number	Name	Organisation/On behalf of
KE-C1-500	Maurice Stack	
KE-C1-501	Sean Kirby	
KE-C1-502	Megan Maher	
KE-C1-503	Michael Carmody	
KE-C1-504	Mikey Kelly	
KE-C1-505	Niall Horgan	
KE-C1-506	Nuala and Gerard O Brien	
KE-C1-507	Rosaleen Sheehy	
KE-C1-508	P Reidy	
KE-C1-509	Rita O'Keeffe	
KE-C1-510	Paul Heffernan	
KE-C1-511	Rebecca Lloyd	
KE-C1-512	Shane Horgan	
KE-C1-513	Mikey Sheehy	
KE-C1-514	Frank Walsh	
Submission 2 and submission 16 were withdrawn as they were test submissions with technical issues		