

Draft Kenmare Municipal District Local Area Plan 2023-2029

Chief Executive's Report

January 2024



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1.0 Introduction

1.1 Legal Preamble

Under Section 18 of the Planning and Development Act 2000 (as amended), Kerry County Council as a Planning Authority may prepare for any particular area within its functional area, a Local Area Plan (LAP) in respect of that area. The Act requires the Plan to consist of a written statement and a plan, indicating objectives for the proper planning and sustainable development of the area. Such objectives are to be consistent with the objectives of the County Development Plan.

It is an objective of Kerry County Council as a Planning Authority to prepare local area plans for the settlements within the Municipal Districts as outlined in Objective KCDP 3-7 of the Kerry County Development Plan 2022-2028 (KCDP 2022-2028). The plan for each settlement shall zone sufficient lands for residential, commercial, economic and social development, within defined development limits, and in accordance with its function. Plans will also make provision for the conservation and improvement of the cultural, natural and built heritage of an area.

When adopted by the Council, local area plans provide the overall framework for the development of an area and are a material consideration in the assessment of planning applications. In addition to its regulatory functions, plans provide both a blueprint for maximising the social and economic potential of each settlement, and a tool for the spatial management of an area.

1.2 Environmental Assessments

In preparing the Local Area Plan, the Planning Authority determined that: -

- Pursuant to the relevant criteria as set out in the Planning & Development Regulations, 2001 as amended, that the proposed plan will not significantly affect the environment, and
- Following the preparation of an Appropriate Assessment, no adverse effects on integrity of the Natura 2000 sites were considered likely.
- A Strategic Flood Risk Assessment was carried out in accordance with Department Guidelines.

1.3 Public Consultation

In accordance with Section 20(1) of the Planning and Development Act 2000 (as amended) Notice of the Draft Local Area Plan, SEA Environmental Report, the Habitats Directive Assessment/ Natura Impact Report and the Strategic Flood Risk Assessment were published in a local newspaper and invited observations and submissions. Copies of the Draft Local Area Plan and Environmental Reports were placed on display for public inspection from Thursday 31st August 2023 until Friday 3rd November 2023 (both dates inclusive) and submissions/observations were invited during this period.

A number of well attended open days for members of the public were held in the Cahersiveen, Kenmare, Killorglin and Knightstown during the public consultation period.

The Draft LAP was also translated into Irish.

1.4 Statutory Bodies

Under Section 20(1) of the Planning and Development Act 2000 (as amended) the Planning Authority is required to consult the prescribed authorities listed under Part 3 Section 13 of the Planning and Development Regulations 2001 (as amended) and those prescribed under Article 13K of the Planning & Development (Strategic Environmental Assessment) Regulations 2004-2011.

1.5 Submissions Received

There were 230 no. submissions received during the public consultation period, 3 of which as gaeilge.

In accordance with Section 20 (3)(ja)(i) of the Planning & Development Act 2000, as amended, written submissions and observations were published on the website of the authority, <https://consult.kerrycoco.ie/en/node/1973/submissions>. In this Chief Executive's Report, submission reference numbers are hyperlinked to their published location.

The Chief Executive's Report in accordance with Section 20(3)(C) (i) & (ii) of the Planning & Development Act 2000, as amended, shall:

- i. list the persons who made submissions or observations,
- ii. provide a summary of –
 - a. the recommendations, submissions and observations made by the Minister, where the notice was sent before the establishment of the Office of the Planning Regulator,
 - b. the recommendations, submissions and observations made by the Office of the Planning Regulator, and
 - c. the submissions and observations made by any other persons, in relation to the draft local area plan in accordance with this section,
- iii. contain the opinion of the Chief Executive in relation to the issues raised, and his or her recommendations in relation to the proposed local area plan, amendment to a local area plan or revocation of a local area plan, as the case may be, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

Where it is recommended to alter the Draft Plan, additional text is highlighted in *italics* with deletions in ~~strike through~~.

2.0 List of Submissions/Observations

The following table lists those who made a submission on the Draft Kenmare Municipal District Local Area Plan 2023-2029 in alphabetical order. The table also includes a reference number for each submission along with the page of the report where the submission is summarised.

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Structure of the CE Report

The submissions received in relation to the Draft Kenmare Municipal District Local Area Plan 2023-2029 have been summarised and responded to following the order as set out in the Table of Contents based on the main topic/issue raised in each submission. Submissions that raised the same issue have been grouped together.

3.0 Submissions

3.1 Statutory Submissions

3.1.1 **Submission KE-C8-198: OFFICE OF THE PLANNING REGULATOR**

Submission Summary:

The Office of the Planning Regulator (OPR) commends Kerry County Council on the significant work undertaken by the Planning Authority to inform the draft LAP, in particular the inclusion of a Climate Action Audit and Settlement Capacity Audit (SCA). The submission includes 5 recommendations and 3 observations relating to the following themes.

Residential Land Use Zoning

The Office raises concerns that the extent of zoning for residential use in Kenmare, Killorglin and Waterville does not comply with the core strategy of the Kerry County Development Plan 2022-2028. It is stated that this has resulted in poorly located lands being zoned, which undermines the implementation of effective compact growth and the potential for regeneration of the town centres. It states that this would be further exacerbated by the proposed R4 Strategic Residential Reserve land use zoning objective, across all zoned settlements.

The Office further considers that there should be a focus on better located lands and the omission of peripheral and non-sequential zonings. In this context the Planning Authority is required to omit the following R1 new residential land use zoning objectives (reference numbers as per Settlement Capacity Audit as contained in the LAP):(i) KE-1, KE-2, KE-3, KE-4, KE-8, KE-9 and KE 13 in Kenmare (ii) KG-6, KG-7 and KG-8 in Killorglin; and (iii) other such lands in Kenmare and Killorglin and Waterville as necessary to ensure the remaining area lands zoned R1 bears a reasonable relationship with the core strategy of the development plan.

Strategic Residential Reserve Land Use Zoning

The Office raises concerns about the extent of the proposed R4 Strategic Residential Reserve land use zoning objective, across all zoned settlements. It states that there is no justification for the proposed R4 zonings under the current Development Plan, which makes no provision for residential reserve. Within this context, the Planning Authority is required to omit the proposed R4 strategic residential reserve zoning objective and associated Objective KENMD-76. It is further stated that it will be necessary for the Planning Authority to consider what appropriate zoning objective or objectives would best ensure the sustainable development of those settlements, consistent with the core strategy and taking account of infrastructural services capacity, including tiered approach to zoning.

Regeneration

The Office commends the Planning Authority for the positive, clear strategic vision for the LAP, which focuses on the reuse, restoration and regeneration of urban cores and implementation of the Town Centre First approach. It states that the policies, objectives and strategies for regeneration, have great potential to revitalise and renew these historic towns, as long as the pressures for urban sprawl are resisted, as recommended above.

Economy and Employment

The Office welcomes the positive policies and objectives for economic growth for the municipal district, and the inclusion of some key baseline data to inform same. However, the Office recommends that a stronger, evidence-based approach be provided for Kenmare town.

Transport and Accessibility

The Office welcomes the inclusion of many positive objectives to support and facilitate active and sustainable travel, the Office has determined that some amendments will be necessary to ensure the transport strategy and associated objectives take account of the current national transport policy and climate policy framework.

The Planning Authority is required to:

- i. insert an objective to confirm that access to lands outside the 50-60kph speed limit zone will conform to the requirements of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) to Objectives KCDP 14-29 and 14-30 of the Kerry County Development Plan 2022-2028,
- ii. insert an objective to deliver new roads infrastructure based on an objective evidence-base, such as through the Local Transport and Traffic Management Plans under KENMD-58, or otherwise, including demonstration of consistency with current national transport policy; and
- iii. amend KENMD-59, to add the following text: Facilitate the carrying out of the works stated in the 'Schedule of MD Works Plan' for the Kenmare MD which are compatible with environmental protection objectives for the area *and with the National Sustainable Mobility Policy (2022), the National Investment Framework for Transport in Ireland, or subsequent policy documents.*

The Planning Authority is also advised to appropriately reference a number of Policy Documents.

Flood Risk Management

Regarding flood risk management, the Office has identified a few issues that need to be addressed in respect of the strategic flood risk assessment and in the associated zoning objectives of the draft LAP. It is required that, the Planning Authority carry out plan making justification tests for the built-up area, including 'town / village centres' and 'mixed use / opportunity sites', in particular, where structural and non-structural measures are required.

In relation to Cahersiveen, it states that parts/or all of sites CH-11, CH-12 and CH-13 fall partly within flood zones A and B and requires an additional objective restricting uses.

In terms of data, it is required that the Strategic Flood Risk Assessment (SFRA) use the appropriate datasets in conjunction with other appropriate sources/datasets, and in certain instance should be combined to inform an overall combined flood risk.

Climate Action

On climate action, the Office welcomes the inclusion of a Climate Action Audit, which is an innovative and very positive addition to the LAP. However, the Office advises that the draft LAP (or the audit, where appropriate) should be amended in order to ensure alignment with the key actions identified in the audit. In addition, the Office welcomes the identification, by way of a symbol, of objectives contributing to the Planning Authority's climate action strategy. The Office considers these two elements to be good practice.

Environment, Heritage and Amenity

The Office notes the Planning Authority has carried out Strategic Environmental Assessment (SEA) and prepared an Environmental Report and the mitigation measures integrated into the draft LAP on foot of same. It states that no meaningful assessment of potential cumulative impacts appears to have been carried out as part of the SEA, the appropriate assessment itself does not refer to the conservation objectives for the European sites concerned, or to the potential for adverse effects arising thereon from the draft LAP. In addition, it is requested that all of the mitigation measures recommended in the AA for inclusion in the draft LAP should be incorporated into the draft LAP.

Implementation and Monitoring

The Office notes that no provision has been made for monitoring the implementation of the draft LAP. It states that the inclusion of a clear monitoring strategy of key plan objectives will enable the Planning Authority to be more effective in implementing the draft LAP and will assist in meeting obligations under section 15(1) and (2) of the Act in respect of securing the objectives of the development plan, under which the LAP sits.

Response:

The views of the Office of the Planning Regulator (OPR) in relation to the LAP are acknowledged and noted. The recommendations and observations of the OPR are dealt with as follows with each recommendation/observation being responded to.

Recommendation 1 – Residential Land Use Zoning

Having regard to the provision of new homes at locations that can support compact and sustainable development, and in particular to:

- the requirements under sections 19(2) and 20(5) of the *Planning and Development Act 2000*, as amended, concerning consistency with the objectives of the development plan and its core strategy;
- the core strategy of the Kerry County Development Plan 2022-2028 (Development Plan), and the housing targets allocated to Kenmare, Killorglin and Waterville;
- Objective KCDP 4-1 of the Development Plan to promote the sustainable development of land to achieve compact growth;
- NPO 3a and 3c, and RPO 3.7.22 for compact growth;
- the policy under section 6.2.3 of the Development Plan to 'support a sequential approach to residential development...'; and
- the policy and objective of the *Development Plans, Guidelines for Planning Authorities (2022)* to implement the sequential approach to zoning,

the Planning Authority is required to omit the following R1 new residential land use zoning objectives:

- i. KE1, KE2, KE3, KE4, KE8, KE9 and KE13 in Kenmare
- ii. KG-6, KG-7 and KG8 in Killorglin; and
- iii. other such lands in Kenmare and Killorglin and Waterville as necessary to ensure the remaining area lands zoned R1 bears a reasonable relationship with the core strategy of the development plan, having regard to the potential yield of those lands and other lands where residential units are open for consideration / permitted in principle under the land use zoning matrix.

The Planning Authority followed the criteria set out in Section 3.1.2 of the KCDP 2022-2028 when setting out the extent and location of residential zonings proposed for Kenmare, Killorglin and Waterville. Criteria such as need and policy context, sequential approach, capacity of infrastructure, supporting infrastructure and facilities, physical suitability and environmental and heritage policy were considered. In addition, lands were also zoned having considered the '*Rebuilding Ireland Action Plan for Housing and Homeless*' which is a national plan with an overarching aim to accelerate the provision of housing.

Having regard to Government Policy on housing as set out in the *Rebuilding Ireland Action Plan for Housing and Homeless* which priorities the construction of housing on suitable state owned lands, the serviced nature of the lands, the suitability of the lands contiguous to an existing Local Authority housing scheme, the detailed design and preparatory work carried out to date in seeking to deliver residential units through the Part VIII process it is considered appropriate to zone lands for residential use at the selected locations.

The Rebuilding Ireland Action Plan seeks to meet the demand for housing in towns and villages on suitable sites and to prioritise the creation of mixed communities of private, social and rented housing on state and local authority owned lands.

The Functional Area Local Area Plans (FALAPs) for Kenmare and Killorglin were adopted in 2010. A limited amount of development has taken place on residential lands zoned in those FALAPS in the intervening period. The zoning maps for the towns of Kenmare and Killorglin as included in the Draft Plan show a reduction of 18.9 (Kenmare) and 11.2 (Killorglin) hectares respectively in the quantum of lands zoned proposed residential. The Draft Plan, therefore, took steps to reduce the zoning of residential lands in these settlements. Based on the submission from the OPR which references the housing target as set out in the Core Strategy, and its exceedance by the lands zoned in the Plan, it is considered necessary to reassess the R1 proposed residential zonings in line with Recommendation 1 as contained in the OPR submission.

The omission in Killorglin of KG-8 in Bansha as recommended by the OPR would reduce the quantum of zoned land proposed in Killorglin. It is acknowledged that sequentially there are unzoned lands between this site and the town centre. This site is adjacent to an existing housing estate and does have the benefit of planning permission for 80 units (Planning Reg. No. 21/188), which if developed will contribute to meeting the housing supply target for Killorglin. This grant of planning permission would be unaffected by a change in the zoning, therefore the recommendation of the OPR to dezone these lands is considered to be appropriate for this location. With this change to the zoning it is considered appropriate to alter the settlement boundary for Killorglin to exclude the existing housing estate in Bansha, which is consistent with the approach taken in other areas of Killorglin.

In relation to KG-6 and KG-7 in Killorglin, these are considered sequential as they are surrounded by existing residential development. The footprint of the town is therefore not being extended. There are C5 lands located between this area and the town centre which would facilitate the development of a hotel in the town as per Objective KENMD-KG-18, it is therefore considered that there are no undeveloped lands between this part of Killorglin and the town centre. As these sites are surrounded by existing residential estates, the development of these sites would result in the consolidation of Killorglin. These sites are also in close proximity to employment, education and community facilities. There is planning permission for 30 dwellings on KG-7 (Planning Reg. No. 19/818), an R1 zoning is therefore considered appropriate for this site at this location. In order to better reflect the housing target for Killorglin as set out in the Core Strategy as highlighted in the submission from the OPR, it is recommended that the zoning of KG-6 be changed to R4. The response of the Council to the OPR's view on R4 lands will be addressed below.

A number of sites are identified in Kenmare, KE-1, KE-2, KE-3, KE-4, KE-8, KE-9 and KE-13 by the OPR and they recommend their omission. The submission from the OPR also refers to other such lands as necessary to ensure the remaining lands zoned R1 bears a reasonable relationship with the Core Strategy, it is therefore considered appropriate to include KE-6, KE-14, KE-15 and KE-16 in the consideration of these lands given their similar characteristics with the sites identified by the OPR.

In general, the sites identified by the OPR are in peripheral locations in Kenmare, and by their nature are infill sites. Having considered carefully the content of the submission received from the OPR and taking into account the infill nature of these sites, their location and extent of lands zoned for residential use and any amendments proposed to the LAP, it is considered appropriate to change the zoning of these lands from R1 Proposed Residential to either R2 Existing Residential or O1 Strategic Reserve. Those lands it is proposed to amend to R2 are considered mainly to be of an infill nature and contiguous to low density residential development, while the proposed amendment to O1 reflect larger sites but are also considered to be mainly of an infill nature that will be suitable for development in the medium to long-term.

With regards to KE-13, this site is considered to meet the criteria for residential zoning. This site borders the relief road to the west and to the east is an existing housing estate. Development of this site would help to consolidate the town of Kenmare and is considered to be sequential in terms of its location. The site is located within walking distance of the town's schools and supermarkets. It is acknowledged that the site is large, it is therefore considered appropriate to retain an R1 zoning on this site but to reduce the portion of this site zoned R1.

The lands zoned R1 in the Regional Towns of Killorglin and Kenmare as referred to in the submission by the OPR, where Kerry County Council does not feel that rezoning is appropriate, are in an area where demand for housing exists. The lands are contiguous to long established residential areas and are physically suitable in terms of access and provision of services. These lands are within walking distance of the town centre and all existing services including educational, health and sporting services and amenities. Housing on these lands will provide for a mix of house types thus addressing the housing needs of a wider spectrum of the population and surrounding area, contributing to a more diverse community.

As per the recommendation from the OPR, the quantum of zoned land in Waterville has been reassessed to ensure a reasonable relationship with the Core Strategy which identified a target of 41 houses for Waterville over the lifetime of the LAP, the errata in Table 3.10 as contained in

the LAP is acknowledged. It is therefore considered appropriate to amend the zoning on sites WE-6, WE-7, WE-8 and WE-9 in order to reduce the quantum of zoned land. It is proposed to change the zoning of WE-6 to O1 Strategic Reserve. For WE-9 it is proposed to reduce the amount of R4 Strategic Residential Reserve in a sequential manner and adjust the settlement boundary for Waterville. It is considered that the location of WE-2, a R1 zoning which is Kerry County Council land, will contribute to the achievement of the compact growth of Waterville as this site is located between existing housing estates, and will result in the potential delivery of local authority housing at a town centre location which would benefit the vibrancy of the town. It should also be noted that lands zoned R1 Proposed Residential in Waterville are the same as those zoned R1 in the West Iveragh Local Area Plan 2019-2025, notwithstanding the increase in the housing target for Waterville between the Core Strategies contained in the KCDP 2015-2021 and KCDP 2022-2028. Lands zoned R4 now show a reduction from that of the West Iveragh Local Area Plan 2019-2025.

The need for R4 Strategic Residential Reserve is justified in Waterville, and other settlements, by the increase in population that settlements in the Kenmare MD has seen between 2016 and 2022, e.g. Waterville increased by 19.7% between 2016 and 2022. It is considered that based on these levels of growth, R4 lands are therefore seen as being required in the short-medium term rather than medium-long term. The future change from R4 to R1 will be on a proportionate basis to meet relevant housing targets.

In the context of the OPR submission and ensuring that there is a relationship between the housing target for a settlement and the Core Strategy, the Settlement Capacity Audit for Sneem shows a potential yield that would be less than the Housing Target as set out in the Core Strategy. It is therefore considered appropriate to zone a limited amount of additional lands as R1 Proposed Residential in Sneem in order to ensure that the housing target for Sneem can be realised.

A revised Settlement Capacity Audit will be included in the Final LAP to reflect adopted amendments.

The National Planning Framework sets out a two-tier approach to land zoning, Tier 1 Serviced Zoned Land (this zoning comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development), and Tier 2 Serviceable Zoned Land (this zoning comprises lands that are not currently sufficiently serviced to support new development but have potential to become fully serviced within the life of the plan i.e. the lands are currently constrained due to the need to deliver some or all development services required to support new development, i.e. road or footpath access including lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity). Lands that have been zoned for residential development in the LAP, R1 Proposed/New Residential, have been zoned in accordance with this approach, and are considered to be Tier 1 lands as the services required to facilitate development are available.

The Development Plans Guidelines for Planning Authorities (2022) state that proposals to facilitate housing development through zoning must be grounded in the knowledge that appropriate services are/will be available to enable development within the plan period. It is also a policy and objective of these Guidelines that planning authorities adopt a sequential approach when zoning lands for development, whereby the

most spatially centrally located development sites in settlements are prioritised for new development first. The zoning of lands for residential development in the LAP are zoned in accordance with these principles.

The Planning Authority is therefore unable to consider the zoning of lands that do not meet the above policies as it would not be in accordance with Objective KCDP 3-6 of the KCDP 2022-2028.

Recommendation 2 – Residential reserve land use zonings

Having regard to the provision of new homes at locations that can support compact and sustainable development, and in particular to:

- the requirements under sections 19(2) and 20(5) of the *Planning and Development Act 2000*, as amended, concerning consistency with the objectives of the development plan and its core strategy;
- the core strategy of the Kerry County Development Plan 2022-2028 (the Development Plan);
- Objective KCDP 4-1 of the Development Plan to promote the sustainable development of land to achieve compact growth;
- NPO 3a and 3c, and RPO 3.7.22 compact growth;
- Development Plan policy under section 6.2.3 '*support a sequential approach to residential development...*'; and
- the policy and objective of the *Development Plans Guidelines for Planning Authorities (2022)* that the zoning of land should be informed by a settlement capacity audit, and to implement the sequential approach to zoning,

the Planning Authority is required to omit the proposed R4 strategic residential reserve zoning objective and associated Objective KENMD-76.

In their submission the OPR state that “there is no justification for the proposed R4 zonings under the Current Development Plan”. The zoning of land as R4 in Kerry is a long-established principle, lands are currently zoned R4 in the Tralee Municipal District Local Area Plan 2018-2024, the Killarney Municipal District Local Area Plan 2018-2024, the Listowel Municipal District Local Area Plan 2020-2026, the Corca Dhuibhne Electoral Area Local Area Plan 2021-2027, and also the West Iveragh Local Area Plan 2019-2025 which this LAP will replace. In the KCDP 2022-2028 there are 26 hectares zoned R4 in Killarney and 5.1 hectares zoned R4 in Listowel.

Volume 6 of the KCDP 2022-2028 contains a section on Land-Use Zoning. The following table is an extract from the land use zoning classification in Volume 6 – Land Use Zoning.

USE	CODE	ZONING	OBJECTIVE	DESCRIPTION
Residential	R4	Strategic Residential Reserve	Provide for future new residential development in tandem with the provision of the necessary	To provide for future residential areas/town extensions to ensure the provision of high quality new residential environments. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities. May also include a range of other ancillary uses for residential, particularly those that have the potential to foster the

			social and infrastructure	Physical	development of new residential communities. Residential Areas are intended primarily for housing development but may also include a range of other ancillary uses for residential, particularly those that have the potential to foster the development of new residential communities. These are uses that benefit from a close relationship to the immediate community, such as crèches, some schools and nursing homes. A limited range of other uses that support the overall residential function of the area may also be considered.
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This section starts by stating, “this Kerry County Development Plan 2022-2028 governs the overall land-use objectives for County Kerry and establishes a policy framework within which the more detailed town/settlement plans contained in Volume 2 of this Plan and the Municipal District Local Area Plans”. It is considered that the zoning of lands in the LAP as R4 Strategic Residential Reserve is therefore in accordance with the Development Plan.

The zoning of lands for residential development in the LAP also complies with Section 3.11 of the KCDP 2022-2028 as it will provide for the long-term sustainable development of the settlements. The period of this Plan is for six years only. However, it is preferable that adequate suitably located lands within settlements are identified in the interests of proper planning and longer-term sustainable development of the settlement. Lands are proposed to be zoned R4 Strategic Residential Reserve in the regional towns and district towns to ensure that they are identified and reserved for future long term residential use. The Settlement Capacity Audit therefore does not include R4 lands in the housing yield totals, therefore it not intended that they will contribute to Housing Supply Target for the next 6 years, with the tables in the LAP currently stating, “R4 lands are not included in the overall estimated housing yield calculations”.

Due to the proposed amendments in Killorglin, where it is proposed to change KG-6 from R1 to R4, it is considered that the quantum of R4 lands in Killorglin should therefore be reduced with the omission of KG-9. It is therefore proposed to alter the settlement boundary for Killorglin by omitting KG-9. It is considered that due to the quantum of lands zoned R1 in Kenmare that R4 lands will not be required over the lifetime of the LAP. It is therefore proposed to omit the lands zoned R4 in Kenmare (KE-18).

In relation to the OPR's recommendation to omit objective KENMD-76, this objective is applicable only to those settlements where both R1 (new/proposed residential zoned) and R4 (strategic residential reserve) lands exist. In any settlement it is considered unlikely that 100% of R1 lands will be developed due to various constraints associated with developing residential land and landownership. It is considered that the 50% as referenced in the objective should be increased to 80%. This will ensure a balance between ensuring that a greater proportion of suitable R1 lands are developed in advance of allowing development on R4 lands.

Objective KENMD-76 would not apply to villages where only R4 lands are zoned. It is considered appropriate to include a new objective in order to ensure that development of R4 lands in villages can be assessed on a case-by-case basis subject to the provision of adequate wastewater disposal and infrastructure. It is therefore proposed to include the following objective, *residential development on R4 (Strategic Residential*

Reserve) lands in those settlements where there is no R1 (New/Proposed Residential) zoned lands shall be subject to the provision of adequate wastewater disposal and infrastructure. It is also considered necessary to include specific text to state that no residential development shall be permitted on R4 lands in the Regional and District Towns in Section 3.1.2.2.

Recommendation 3 – Residential zonings for villages

Having regard to the provision of new homes at locations that can support compact and sustainable development, and in particular to:

- the requirements under sections 19(2) and 20(5) of the *Planning and Development Act 2000*, as amended, concerning consistency with the objectives of the development plan and its core strategy;
- the core strategy of the Kerry County Development Plan 2022-2028 (Development Plan), and the housing targets allocated to villages;
- Objective KCDP 4-1 of the Development Plan to promote the sustainable development of land to achieve compact growth;
- NPO 3a and 3c, and RPO 3.7.22 compact growth;
- NPO 72 tiered approach to zoning;
- Development Plan policy under section 6.2.3 'support a sequential approach to residential development...'; and
- the policy and objective of the *Development Plans, Guidelines for Planning Authorities (2022)* that the zoning of land should be informed by a settlement capacity audit, and to implement the sequential approach to zoning,

the Planning Authority is required to determine appropriate land use zoning objectives to replace the proposed R4 strategic residential reserve zoning objective, consistent with the core strategy and taking account of infrastructural services capacity of the lands concerned.

The MD plan proposes R4 Strategic Residential Reserve lands in Beaufort, Chapelstown, Dún Géagáin, Glenbeigh, Kilgarvan, Knightstown, and Portmagee. 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 (while acting as an alternative to one-off housing). The strategy for 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.

The zoning of residential land takes into consideration the level of housing demand indicated in Table 3.7. Core Strategy of the KCDP 2022-2028 where there is a housing allocation to both villages (432 units) and small villages (186 units). It is within this context that locations for future residential development have been identified in these settlements.

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. A focus on supporting vibrant rural communities centred on a network of rural village settlements is a cross cutting theme of the KCDP 2022-2028 and this LAP. This approach is supported by National and Regional strategies that seek to achieve sustainable settlements/communities by identifying the settlements which can, through targeted sustainable growth, create the critical mass in population and infrastructure necessary to drive economic growth. The identification of lands within rural villages is therefore imperative in the creation of the critical mass. This critical mass in turn will inform the Uisce Eireann Small Towns and Villages Growth Programme. The Planning Authority

recognises the challenges of providing for affordable housing in many of these settlements, to this extent additional lands have been identified and zoned for housing (R4) in tandem with the upgrading of the wastewater treatment plant and subject to environmental assessment. In addition to this, it is the policy of Kerry County Council to fully support the Uisce Éireann Small Towns and Villages Growth Programme (see Vol 1 appendices), where Glenbeigh and Knightstown are priority on the list while Dún Géagáin/ Ballinskelligs, Kilgarvan and Portmagee are also listed on the programme. In addition, it should be also noted that Beaufort and Chapeltown are included in Table 5.1: Settlements where clusters served by individual treatment systems may be considered in Chapter 5 of the KCDP 2022-2028.

If lands are not zoned R4 in the villages then it leaves no lands identified as being suitable for residential development. Development on R4 lands in the villages in the MD will therefore be facilitated in accordance with amended Objective KENMD-76. It is also considered prudent to update the text of Section 3.1.2.2 to better reflect this objective and to provide additional clarity in relation to residential development in villages and small village settlements.

Recommendation 4 – Sustainable transport and accessibility

Having regard to the need to provide for sustainable transport and, in particular:

- Objective KCDP 14-5 of the Development Plan to set modal share targets in Local Area Plans;
- RPO 163 Sustainable Mobility Targets, RSES, to set targets for sustainable mobility in Local Area Plans;
- The *Climate Action and Low Carbon Development Act 2015*, as amended, mandatory target to reduce greenhouse gas emissions by 51% and the *Climate Action Plan 2023* and *National Sustainable Mobility Policy (2022)* targets to reduce vehicle kilometres travelled per year and associated actions and goals;
- the *National Investment Framework for Transport in Ireland (2021)*; and
- the *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)* and Objectives KCDP 14-29 and KCDP 14-31 of the development plan,

the Planning Authority is required to:

- i. insert an objective to confirm that access to lands outside the 50-60kph speed limit zone will conform to the requirements of the *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)* to objectives KCDP 14-29 and 14-30 of the Kerry County Development Plan 2022-2028,
- ii. insert an objective to deliver new roads infrastructure based on an objective evidence-base, such as through the Local Transport and Traffic Management Plans under KENMD-58, or otherwise, including demonstration of consistency with current national transport policy; and
- iii. amend KENMD-59, to add the following text (in red):
Facilitate the carrying out of the works stated in the 'Schedule of MD Works Plan' for the Kenmare MD which are compatible with environmental protection objectives for the area and with the National Sustainable Mobility Policy (2022), the National Investment Framework for Transport in Ireland, or subsequent policy documents.

The Planning Authority is also advised to appropriately reference the following:

- a. *National Sustainable Mobility Policy (2022)*, the National Investment Framework for Transport in Ireland;

- b. Design Manual for Urban Roads and Streets;
- c. the Cycle Design Manual (2023),
- d. TII Publications Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads'

It is the policy of the KCDP 2022-2028 to comply with the requirements of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) as outlined in Objectives KCDP 14-29 and 14-30 of the KCDP 2022-2028. The LAP forms part of a planning policy framework hierarchy and therefore all policies and objectives in the KCDP apply to this LAP and there is no need for duplication.

There is an extensive network of National Roads throughout the MD area serving a number of settlements. Kerry County Council have reviewed the zoning designations and settlement boundaries and can confirm that any proposed access to lands (which adjoin or extend) along the national road network outside locations subject to a reduced 50 – 60kph urban speed limit shall comply to the requirements of the DoECLG Spatial Planning and National Roads Guidelines concerning the general restriction on access to national roads as well as Objectives KCDP 14-29 and KCDP 14-30 of the KCDP 2022-2028. Access will only be permitted within the designated speed limit area. All proposed developments along these routes are referred to the TII for their attention.

The Planning Authority is also advised to appropriately reference documents as listed in the recommendation. These documents are referenced throughout the relevant sections within the KCDP 2022-2028, see Sections 4.2.5, 4.2.7, 14.3.1, 14.4.1, and the subsequent objectives. It is considered appropriate to include reference to the new publication Cycle Design Manual (2023) in Section 2.11.1.2.1 of the Draft LAP.

It is considered appropriate to include an additional objective to ensure that new roads infrastructure is based on an evidence-base as suggested.

It is also considered appropriate to amend KENMD-59, to include the additional *text National Sustainable Mobility Policy (2022), the National Investment Framework for Transport in Ireland, or subsequent policy documents.*

Recommendation 5 – Flood Risk Management

Having regard to flood risk management and, in particular:

- NPO 57 requiring implementation of *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)* and integration of sustainable water management solutions; and
- RPO 3.10, flood risk management and integration of sustainable water management solutions,

the Planning Authority is required to:

- i. carry out the plan making justification tests for the built up area, including 'town / village centres' and 'mixed use / opportunity sites', in particular, where structural and non-structural measures are required;

- ii. limit development to only water-compatible development within Flood Zone A and less vulnerable development in Flood Zone B, on sites M1.1 (CH-13), M1.2 (CH-11) and M1.3 (CH-12) within Cahersiveen unless these sites first pass the plan-making justification test;
- iii. Ensure the Strategic Flood Risk Assessment, including any proposals to zone land, is based on appropriate datasets. Where data sets are not available, supplementary flood risk assessments will be required to inform the extent of flood risk areas;
- iv. take National Indicative Fluvial Mapping data into account for the flood zone maps for Sneem, Waterville and Portmagee; and
- v. provide combined datasets between coastal and fluvial flooding for Kenmare and Killorglin to inform single flood zoned maps for these settlements.

The Planning Authority should consult the Office of Public Works in addressing this Recommendation

Following the receipt of the submission from the OPW, Kerry County Council has engaged in consultation with its SFRA consultants and the OPW in relation to the content of their submission. The issues raised by the OPR and OPW are responded to and further addressed in Section 3.1.10.

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:

- 1) include additional mitigation measures for existing development in areas zoned Mixed-use/opportunity site (M1), Town Centre (M2), Built Up Area (M4) and Existing Residential (R2). 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 are 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.
- 2) regarding the three opportunity sites (CH-11, CH-12 & CH-13) within Cahersiveen, *only water-compatible development is permitted within these sites. In the interests of clarity it is necessary to specify and limit development to only water-compatible development within Flood Zone A and water compatible/less vulnerable development in Flood Zone B, unless proposals within these sites first pass a flood risk management justification test, to the satisfaction of the Planning Authority.*

Observation 1 – Economic and employment

The Planning Authority is advised to review its zoning objectives for lands for employment uses with a view to clarifying the type of employment uses based on their intensity and nature relative to the accessibility of their location, and the servicing status of those lands.

The LAP, in providing for employment zonings within the settlement network 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. Also, it should be noted that in exceptional cases some types of economic development can only be accommodated on more remote sites and that this type of development needs to be provided for in a careful and considered manner. In addition, the future development of land uses such as enterprise and employment and industrial lands are dependent on a range of external factors beyond the control of the Local Authority such as land ownership, funding etc.

Lands have been zoned for C2.1 (industrial/employment/enterprise) and C6 (Mixed use/general commercial/industrial/enterprise) in a number of settlements in the LAP. A number of these sites represent existing industrial enterprises such as Astellas and Temmler in Killorglin, where additional lands have been zoned to enable further development of these enterprises.

In Kenmare lands have been zoned for employment uses within the town boundary to allow for an increased employment/enterprise presence in the town as opposed to the previous pattern of such development which located to the north of the town, in particular the developments in the Gortamullen area. The lands as zoned would facilitate employment opportunities in the town to complement its envisaged residential growth.

The Economic Development Unit of Kerry County Council 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.

Observation 2 – Environmental Assessments

The Office advises the Planning Authority to satisfy itself that:

- i. it has adequately addressed cumulative impacts in its carrying out of and reporting its strategic environmental assessment of the draft LAP, having regard to the *Strategic Environmental Assessment: Guidelines for Regional Assemblies and Planning Authorities (2022)*;
- ii. it has carried out appropriate assessment of the draft LAP on any European site in view of its conservation objectives; and
- iii. the mitigation measures recommended in the Natura Impact Report have been incorporated into the draft LAP.

A SEA has been carried out to consider all the likely significant effects on the environment of implementing the LAP. The NIR confirms that all AA recommendations were incorporated into the Draft Plan.

Cumulative impacts were considered throughout the preparation of the Environmental Report of the SEA of the LAP, rather than set out in one specific section. In the interests of clarity, however the Planning Authority will provide an additional section addressing cumulative impacts in the Kenmare MDLAP ER Addendum Report, which will be prepared at the proposed amendment stage of the LAP making process.

The Planning Authority is satisfied that an appropriate assessment of the draft LAP on European sites in view of their conservation objectives has been undertaken. Conservation objectives for the European Sites potentially impacted by the Plan are discussed in S4.4. of the Natura Impact Report. In the interests of clarity, the Planning Authority will provide additional information on European Site Conservation Objectives and the potential for adverse effects arising thereon, within the Kenmare MDLAP NIR Addendum Report, which will be prepared at the proposed amendment stage of the LAP making process.

In relation to the Kenmare LAP, it should be noted that the zoning south of the River Finnihy, referred to in NIR mitigation measures was changed to C5 Tourism and Related and that the recommended buffer was incorporated in to the LAP. It is accepted that a number of the other mitigation measures could have been more completely incorporated into the LAP. Accordingly, the following amendments to the LAP are now proposed:

Section 3 Killorglin

3.2.3.9.5 Dromavally (N72) Tourism Site (C5)

This site is located between the River Laune and the N72. The site is also strategically located in proximity to the town centre and to the Killorglin Bridge. Potentially, the site presents an opportunity to provide for the transitory service needs of recreational vehicles users in a sustainable manner. There are some development constraints associated with the site including the following:

- Nature Conservation - ~~This site~~ These lands adjoins a European Natura 2000 site, which is a nature conservation site of international importance. Accordingly, ~~and therefore~~ development proposals for these lands will be required to demonstrate compatibility with the conservation objectives of the Natura 2000 site and an *Appropriate Assessment (AA) Screening Report* and possibly a *Natura Impact Statement* should be submitted as part of any development proposal. A buffer zone between the Natura 2000 site and a development proposal may be required. As part of the ~~NIS~~ AA Screening, the potential for wildlife disturbance, *water quality degradation*, trampling of sensitive vegetation and the potential spread of invasive introduced species should be considered. It is noted that stands of Japanese Knotweed are currently located ~~within the site~~ in the vicinity. This is a vigorous introduced invasive species and accordingly development proposals for these lands should include proposals for the appropriate removal and long-term control of this species, as appropriate.
- Flood Risk Management - The site is also partly located on the historic floodplain of the River Laune. Development proposals will be required to incorporate sustainable flood risk management designs and practices as recommended in the DoEHLG (2009) publications 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities and Technical Appendices'. As part of this, proposals should not reduce the overall flood water storage capacity in the area and sustainable urban drainage systems (SUDS) should be incorporated.
- Water Quality - Development proposals should include detailed proposals for dealing with surface water runoff from the site so as to ensure that water quality of the River Laune is not adversely affected. As part of this hydrocarbon filters and sediment traps should be incorporated, where appropriate
- Visual impact / landscaping - Proposals should be appropriately screened and carefully designed having particular regard to its sensitive location on the approach road to the Town from Killarney and to its visibility from the opposite bank of the River Laune, which is used for recreational purposes. Landscaping proposals should be compatible with the Nature Conservation objectives of the adjoining Natura 2000 site, while a high standard of finished materials will be expected. Proposals should have regard to Inland Fisheries Ireland's guidance document on managing watercourses in urban environments, as appropriate.
- Waste Management - Development proposals shall be accompanied with a detailed waste management plan which shall cover both the construction and operation phases of the development.

The following to be included after the second paragraph in Section 3.2.2.7.3 Natural Heritage;

The development of lands adjoining the River Finnihy including lands adjoining the tidal waters downstream of Cromwell bridge will be subject to project level environmental assessment and be required to take into consideration the requirements of the Habitats Directive, Departmental flood risk management guidelines and Inland Fisheries Ireland's planning guidelines on urban watercourses, as appropriate.

The following to be included in Section 3.5 (Small Village Settlements);

As the settlement of Templeoe is located in the vicinity of an important Lesser horse bat roosting site associated with the Old Domestic Building Dromore Woods Special Area of Conservation (SAC), development proposals within this settlement will be required to be compatible with the conservation objectives of the SAC. As part of this careful consideration should be given to lighting and landscaping proposals so as to avoid unnecessary light spillage / pollution.

It is considered to include the change to Section 3.2.2.7.3 as an amendment to the LAP and the other changes are not considered to be material amendments.

Observation 3 – Implementation and Monitoring

The Office advises the Planning Authority to include a monitoring strategy for implementation of the draft LAP, having regard to section 6.5 of the *Local Area Plan Guidelines for Planning Authorities (2013)*, the provisions of the *Development Plans, Guidelines for Planning Authorities (2022)* and section 15 of the Planning and Development Act 2000, as amended).

Kerry County Council is committed to reporting on and spatially analysing the planning and development trends in the County. Assessment includes the development trends being experienced at Municipal District and settlement level, with the agreed housing and population targets as set out in the core strategy of the KCDP 2022-2028.

To assess how well this LAP is being implemented, it is necessary to have an ongoing monitoring system for the LAP. The Planning Directorate of the County Council is primarily responsible for monitoring and implementing the Development Plan, mainly through the development management function. It is important to note that this Plan co-ordinates the work and objectives of other key departments within the Local Authority, such as Economic Development, Roads, Environment, Housing and Community Development.

The Council is committed to the preparation of an 'Annual Development Plan Monitoring Report' containing this key information which will be assembled by the Planning Authority and presented to the elected members. This report will then be published on Kerry County Council's website. Monitoring of the LAP will form part of this report.

It is recommended that reference to Implementation & Monitoring is included in Section 1 of the LAP.

Recommendation:

Kenmare - It is recommended to amend the Kenmare zoning map on sites KE-1, KE-3, KE-4, KE-5, KE-6, KE-8, KE-9, KE-14, KE-15, KE-16 to R2 Existing Residential, it is recommended to amend the zoning on sites KE-2 and part of KE-13 to O1 Strategic Reserve, and it is recommended to amend the zoning of site KE-18 to O1 Strategic Reserve. See Amendment 17 in Section 4.5.1.

Killorglin - It is recommended to amend the Killorglin zoning map to omit the zoning of KG-8 and adjacent lands zoned R2 Existing Residential and to omit the zoning of KG-9, and it is recommended to change the zoning of KG-6 to R4 Strategic Residential Reserve. See Amendment 25 in Section 4.6.1.

Sneem - It is recommended to amend the Sneem zoning map from O1 Strategic Reserve to R1 New/Proposed Residential. See Amendment 27 in Section 4.7.1.

Waterville - It is recommended to amend the Waterville zoning map to amend WE-6 from R4 Strategic Residential Reserve to O1 Strategic Reserve, it is recommended to change the zoning of WE-7 and WE-8 to R4 Strategic Residential Reserve, it is recommended to change the zoning of WE-7 and WE-8 from R4 Strategic Residential Reserve to R2 Existing Residential, and it is recommended to amend WE-9 by omitting part of the lands zoned R4 Strategic Residential Reserve and adjoining R2 Existing Residential. See Amendment 29 in Section 4.8.1.

It is recommended to amend the text of Section 3.1.2.2 as follows:

- Residential development on R4 (Strategic Residential Reserve) lands will be permitted only on completion of ~~50%~~ 80% of the R1 (New/Proposed Residential) zoned lands subject to the provision of adequate infrastructure.
- ~~Where no lands have been identified as R1 or R4 in a particular settlement, residential development will only be considered subject to consideration of the KCDP Core Strategy and the provision of adequate water infrastructure.~~
- *Ensure that residential development on R4 (Strategic Residential Reserve) lands in Villages complies with the Core Strategy and is subject to the provision of adequate water infrastructure.*
- *In Small Village Settlements (where no lands have been identified as R1 or R4), cluster type residential development will only be considered subject to the provision of adequate water infrastructure as per Section 3.5.2 of this Plan.*

It is recommended to amend Objective KENMD-76 as follows;

Prohibit development on lands zoned R4 (strategic residential reserve) until ~~50%~~ 80% of the R1 (new/proposed residential zoned) lands have been developed to the satisfaction of the Planning Authority and subject to the provision of adequate infrastructure.

It is recommended to include a new objective in Section 3.1.2 (Residential Objectives) as follows;

Ensure residential development on R4 (Strategic Residential Reserve) lands in Villages shall comply with the provisions of the Core Strategy and is subject to the provision of adequate water infrastructure.

It is recommended to include a new objective in Section 2.11 (Connectivity Objectives) as follows;
Ensure new roads infrastructure is based on an objective evidence-base, such as through the Local Transport and Traffic Management Plans, or otherwise, including demonstration of consistency with current national transport policy.

It is recommended to amend objective KENMD-59 as follows;
 Facilitate the carrying out of the works stated in the 'Schedule of MD Works Plan' for the Kenmare MD which are compatible with environmental protection objectives for the area *and with the National Sustainable Mobility Policy (2022), the National Investment Framework for Transport in Ireland, or subsequent policy documents.*

It is recommended to amend the text of Section 2.11.1.2.1 as follows;
 The Council will facilitate the sustainable development of greenways & cycleways *in compliance with the Cycle Design Manual (2023).*

It is recommended to amend the text of Section 3.2.1.5.3 as follows;
to limit development to only water-compatible development within Flood Zone A and water compatible/less vulnerable development in Flood Zone B, unless proposals within these sites first pass a flood risk management justification test, to the satisfaction of the Planning Authority.

It is recommended to include a new section, Implementation & Monitoring, in Section 1 as follows;
Implementation & Monitoring
The Plan sets out the Council's vision and strategy for the Municipal District of Kenmare, including specific policy and objectives to provide a framework for the sustainable development of the Municipal District over the period 2023-2029. Regular monitoring of the progress made in relation to ensuring the effective delivery of the objectives set out in the Plan will take place. The implementation of the Local Area Plan requires the cooperation and participation of all stakeholders. Coordination between other key departments in the Local Authority will be critical in ensuring that those objectives relating to issues such as roads, housing and community development are achieved.

It is recommended to include the following text in Section 3.2.2.7.3 as follows;
The development of lands adjoining the River Finnihy including lands adjoining the tidal waters downstream of Cromwell bridge will be subject to project level environmental assessment and be required to take into consideration the requirements of the Habitats Directive, Departmental flood risk management guidelines and Inland Fisheries Ireland's planning guidelines on urban watercourses, as appropriate.

3.1.2 **Submission KE-C8-1:** **DEPARTMENT OF AGRICULTURE, FOOD & THE MARINE**

Submission Summary:

In relation to Fishery Harbours the submission states that there are no impacts on fishery harbours due to the proposed plan. The submission states in relation to Aquaculture that the Plan will need to be cognisant of the potential impact of any proposed land-side infrastructural development. In the relevant cases assessment may be required to examine the effects on water quality for aquaculture sites and waters and the effects

(improvements or otherwise) on the infrastructure servicing aquaculture sites. The Department submission concludes by stating that there are no issues of relevance to the Department for the draft LAP.

Response:

The submission by the Department is noted, in particular reference to aquaculture. It is an objective of the Council, KCDP 9-75, in the KCDP 2022-2028, to support and promote the sustainable development of the marine and aquaculture sectors.

Recommendation:

No amendment proposed.

3.1.3 [Submission KE-C8-17:](#) **ENVIRONMENTAL PROTECTION AGENCY (EPA)**

Submission Summary:

The submission contains guidance in relation to the undertaking of the SEA as part of the Local Area Plan process.

Response:

The submission by the EPA in relation to the implications of the SEA Regulations in relation to the LAP is noted.

Recommendation:

No amendment proposed.

3.1.4 [Submission KE-C8-20:](#) **DAA PLC**

Submission Summary:

The submissions states no comment to make in respect of the Draft Plan, other than to recommend consultation with the IAA and AirNav Ireland.

Response:

The contents of the submission are noted.

Recommendation:

No amendment proposed.

3.1.5 [Submission KE-C8-30:](#) **COMMISSIONERS OF PUBLIC WORKS IN IRELAND (OPW)**

Submission Summary:

The submission lists the buildings within the ownership of the OPW that are included on the Record of Protected Structures. The submission states that there are properties that have been recently added to the list that may not be suitable and that Kerry County Council's conservation officer should be consulted in this regard.

Response:

The contents of this submission from the OPW are noted. The LAP does not propose to add any additional protected structures to the Record of Protected Structures which is contained in Volume 3 of the KCDP 2022-2028, the locations of these buildings are shown on the land use zoning maps for illustrative purposes.

The submission makes reference to the zoning of the former Garda Station in Dún Géagáin. This site is zoned S3 Community Facilities. Based on the land use zoning matrix contained in the LAP a variety of uses are open to consideration for this site. As the current zoning is therefore broad, it is considered that a change is not required.

Recommendation:

No amendment proposed.

3.1.6 [Submission KE-C8-47](#): NATIONAL OFFICE FOR ENVIRONMENTAL HEALTH SERVICES**Submission Summary:**

The Environmental Health Service (under the remit of Healthy Ireland) highlights the following as being of relevance to the Draft Plan:

- Healthy Ireland in the Health Services – National Implementation Plan
- Tobacco Free Ireland
- Healthy Ireland: Get Ireland Active – National Physical Activity Plan for Ireland
- Healthy Ireland - A Healthy Weight for Ireland
- The National Positive Ageing Strategy
- Time to move on from congregated settings –A strategy for community inclusion

The submission also outlines how the Draft Plan should aim to support and fulfil the United Nations 17 Sustainable Development Goals and should take into account the following:

Ireland's Second National Energy Efficiency Action Plan to 2020

- Transport
 - Smarter Travel Policy
 - National Cycle Policy Framework
- Waste
 - A Resource Opportunity – Waste Management Policy in Ireland
 - National Strategy on Biodegradable Waste
- Water
- Biodiversity & Green Areas
 - EPA Research 195: Health Benefits from Biodiversity and Green Infrastructure

- Environmental Noise
- Flood Risk
- Air Quality

Response:

It is an objective of the KCDP 2022-2028, KCDP 6-11, to support the objectives of public health policy including Healthy Ireland/Kerry and the National Physical Activity Plan. It is not the intention to repeat objectives contained in the Development Plan in the LAP.

Compliance with the Sustainable Development Goals is a main tenet of the KCDP 2022-2028, and by extension, the LAP.

The policies raised in this submission are all supported and/or facilitated by the policies/objectives contained in the KCDP 2022-2028. It is therefore considered that these issues have been addressed in the development plan.

Recommendation:

No amendment proposed.

3.1.7 [Submission KE-C8-53](#): DEPARTMENT OF EDUCATION**Submission Summary:**

For the settlements of Cahersiveen, Kenmare, Killorglin, Sneem & Waterville the Department's preference would be to expand these existing facilities (if possible) should there be a requirement for additional school places as a result of these potential population increases set out in the Core Strategy.

Villages and Small Village Settlements - no population projections and no anticipated requirement for additional capacity in the village schools. The Department requests the Planning Authority to examine the potential of protecting a land buffer around each of the primary schools in the towns to enable them expand further if required to meet the future population growth in the Kenmare MD area. The schools in question are: St Finians (R/N 16014A), Caherciveen NS (R/N 20112W), Scoil Naomh Michael (R/N 08251S), St John NS (R/N 20197K), Scoil Mhuire (R/N 12832O).

The Department notes and supports KENMD-SV-9 (Irish language), KENMD-20 (creativity & cultural hubs) and 3.2.2.12 Connectivity, to further improve links between residential areas and schools, implementation of traffic calming measures at key locations and provision of improved pedestrian and cycling infrastructure are required, also between schools and residential areas.

In terms of assessing current and future capacity, the Department is mindful of Ukrainian crisis and also anticipates that additional special education needs provision at both primary and post-primary level will be required in the future throughout the country and will consult with the Council if and when this is required.

Response:

It is the policy of Kerry County Council to work in partnership with the educational sector (and all other public sectors), communities and other agencies to implement the objectives of this Plan and develop educational and community facilities in key locations in the LAP area, where possible. In identifying potential sites for such facilities, the Planning Authority take into consideration a number of factors including potential population increases set out in the Core Strategy. Given the current conflict in Eastern Europe, Kerry County Council is playing an active role in supporting and hosting families who require our assistance in securing accommodation and getting access to other supports including the educational system.

Where feasible, lands have been zoned to facilitate the extension of schools in settlements, for example see Section 3.2.4.1 in relation to a submission from St. Michael's National School in Sneem.

Recommendation:

No amendment proposed.

3.1.8 Submission KE-C8-56: TRANSPORT INFRASTRUCTURE IRELAND (TII)**Submission Summary:**

Transport Infrastructure Ireland (TII) outlines the following observations;

TII would welcome consideration by the Council of the following as new Connectivity Objectives in Section 2.11 'Connectivity' to reflect 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 are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users, including the critical lifeline route functions of these routes.

TII notes that a number of the Settlement Plans included for Regional and District towns situated on the national road network included in the LAP include objectives related to public realm, traffic calming/management and provision of improvements to cycleway and pedestrian facilities, etc. While the Council will be aware that DMURS principles will apply generally to works and improvements to urban roads and streets, where national roads are impacted, even in reduced speed urban contexts, adherence will be required to complementary TII Publications (formerly the NRA DMRB) in the interests of safeguarding the safety of all road users. In that regard, please note complementary TII Publication 'The Treatment of Transition Zones to Towns and Villages on National Roads' (TII Publications DN-GEO-03084).

TII would welcome consideration by the Council of the following:

- The incorporation of reference to TII Publications Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads' in the LAP complementary to DMURS in the interests of providing clarification that such a standard will be applied, in the interests of road user safety, on national roads in reduced urban speed limit locations, complementary to DMURS principles.

- The Council will be aware that it remains the requirement that a Design Report is completed and submitted for works to national roads in accordance with TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes) and TII would welcome this requirement reflected in the Local Area Plan prior to finalising.

Section 3 of the LAP includes settlement frameworks for a range of settlements many of which are situated on the national road network. It is noted that a number of the proposed settlement frameworks adjoin or extend along the national road network outside locations subject to a reduced 50 – 60kph urban speed limit. TII recommends a review of the identified zoning designations and settlement frameworks and confirmation that access to lands which adjoin or extend along the national road network outside locations subject to a reduced 50 – 60kph urban speed limit should conform to the requirements of the DoECLG Spatial Planning and National Roads Guidelines concerning the general restriction on access to national roads as well as Objective KCDP 14-29 and Objective KCDP 14-30 of the KCDP 2022-2028.

In relation to greenway and active travel proposals in the LAP area, TII recommends consultation with the Councils own internal project and/or design staff.

Response:

The Council acknowledges TII's observations in relation to the Draft Plan. Any additional improvements relating to national roads at a local level, will be done in consultation and agreement with TII and in accordance with the DoECLG Spatial Planning and National Roads Guidelines. Policies and objectives relevant to National Roads, and development along same, are contained in Chapter 14 of the KCDP 2022-2028.

Objective KCDP 14-31 as contained in the KCDP 2022-2028 references the TII Publications Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads'.

In relation to those proposed settlement frameworks that adjoin or extend along the national road network outside locations subject to a reduced 50 – 60kph urban speed limit see the response in Section 3.1.1 to the OPR submission.

Recommendation:

No amendment proposed.

3.1.9 [Submission KE-C8-63:](#) DEPARTMENT OF TRANSPORT

Submission Summary:

The submission makes the following observations and recommendations:

There have been important policy developments which are relevant to accessible, integrated and sustainable public transport. National Disability Inclusion Strategy (NDIS) 2017-2022 includes specific actions assigned to local authorities. For example, action 108 relates to the 'dishing' of footpaths and action 109 relates to accessible infrastructure, including bus stops. Lack of dishing is often cited as a major concern

for wheelchair users. The DoT welcomes the text in Section 2, Strategic Vision and Development Strategy' (Section 2.1.4 Strategic Aims, page 16), 'The creation of an age friendly environment that will cater for the needs of an aging population'.

(DMURS) Interim Advice Note – Covid-19 Pandemic Response published in 2020. It includes guidance that designers should ensure that:

- measures align with the principles of universal design,
- consider Government policy on accessibility for people with disabilities and
- consult people with disabilities to further appraise measures.

To make public transport fully accessible to people with disabilities requires a 'whole journey approach' by ensuring a universal design approach to the built environment'. This including footpaths, tactile paving, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters.

The Connecting Ireland Rural Mobility Plan (2022-2025) is a major national public transport initiative with the aim of increasing public transport connectivity, particularly for people living outside the major cities and towns. Over 100 rural villages will benefit from frequent public transport service (at least three return trips daily) for the first time. The Plan will also see a 25% overall increase in rural bus services, and over 60 new connections to regional cities from surrounding areas. DoT can assist with appropriate text in the development plan regarding integrated, accessible public transport.

References in the Draft Plan to the 2019 version of DMURS should be replaced with references to the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response.

Response:

The Council acknowledges the Department's observations in relation to the Draft Plan and will continue to liaise with the department regarding the preparation of Local Transport and Mobility Plans, and all other projects. It is considered appropriate to refer to the updated version of DMURS references to the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response will be updated in the final plan.

Recommendation:

No material amendment proposed.

3.1.10 [Submission KE-C8-96:](#) OFFICE OF PUBLIC WORKS (OPW) – FLOOD RISK MANAGEMENT

Submission Summary:

This submission is made specifically concerning flood risk management and relates to the Strategic Flood Risk Assessment and its input into the policies and objectives in the LAP. This very detailed submission contains the following headings (for further specifics see the submission).

- Flood Risk Identification: in section 4 of the SFRA, Kerry County Council might consider removing the climate change scenario mapping and only show the 1% and 0.1% present day extents and the removal of zoning maps or referencing the maps in Section 5.1.

- Section 5.1.9 NIFM Watercourses & Unmapped Watercourses: For the unmapped watercourses Kerry County Council should carry out a risk assessment of each and establish if Stage 3 detailed flood risk assessments are required to be carried out to inform the zoning and planning decisions.
- Interactive Mapping: Kerry County Council might consider only showing the Flood Zones, the NIFM and NCFHM are available to view on the OPW webportal.
- Groundwater: Kerry County Council to note that the OPW's PFRA groundwater maps have been superseded by the GSI's 2016-2019 GW Flood Project mapping.
- Justification Test: if a plan-making Justification Test is appropriate, it should be completed by Kerry County Council.
- Policy Objectives: Kerry County Council should review if the recommendations have been transposed into the Draft Plan, and if so Kerry County Council might include the relevant reference to support the discussion.
- Camping/Glamping: Kerry County Council should ensure that lands used for this purpose have the necessary warning and evacuation plans in place.
- Register of Key Flood Risk: Kerry County Council might consider including a register of key flood risk infrastructure in the Plan where it would not otherwise be readily identified or protected from interference or removal.
- Consideration of Climate Change Impacts: The OPW welcomes that climate change maps overlaid with land use zoning mapping has been included for both the mid-range and high-end future scenarios. It should be noted that future scenario mapping is also available for the National Indicative Fluvial Mapping (NIFM).
- Nature-based Solutions and SuDS: The OPW welcomes the discussion on SuDS in the SFRA, particularly Table 6.2: Sustainability Hierarchy for a range of SuDS techniques. The OPW also welcomes Objectives KENMD-48 and KENMD-77.

The submission also contains comments that are specific to the settlements Cahersiveen, Killorglin, Kenmare, Sneem, Waterville and Portmagee.

Response:

Having regard to submissions from the OPW and the OPR, 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 use all available datasets to produce combined Flood Zone A and B mapping and to incorporate all key flooding requirements and mitigation measures identified in the SFRA into the LAP.

In addition, it must be noted that preliminary indicative datasets including NIFM and NCFHM informed the precautionary approach that has been taken in this Plan and has informed the landuse zoning.

Having regard to the specific issues raised;

Flood Risk Identification; the SFRA will remove the climate change scenario mapping and only show the 1% and 0.1% present day extents and the removal of zoning maps or referencing the maps in Section 5.1.

NIFM Watercourses & Unmapped Watercourses; It is an objective of the LAP, KENMD-50, to ensure that development proposals in zoned lands located in proximity of a watercourse, that currently has no flood zone mapping or designated flood zones, that a site-specific flood risk assessment shall be completed to an appropriate level of detail so that Flood Zones can be defined and the Sequential Approach/Justification Test can be applied where necessary, this objective is considered to be sufficient.

Interactive Mapping; The Planning Authority will use all datasets available to produce combined Flood Zone A and B mapping. It is considered prudent to show only showing these Flood Zones on the interactive mapping and therefore NIFM and NCFHM layers will not be included when the Material Amendments are published.

Groundwater; This updated dataset is noted.

Justification Test; 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).

It was considered necessary to include objectives which include mitigation measures for existing development in areas zoned Town Centre (M2), Built Up Area (M4), Existing Residential (R2), and Tourism & Related zoned lands (C2 & C5). 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 (KENMD-47 & 52) are included in the LAP to ensure development in these areas was restricted to minor development as defined therein, and to support the requirement for an SSFRA. It is also considered appropriate to include a cross reference in the SFRA to the objective that is relevant e.g. KENMD-47 for existing development in Flood Zone A & B.

Policy Objectives; In general, the findings of the SFRA have been incorporated into the landuse zoning and policies. Section 2.9.2 of the LAP relates to land-use and flood risk management, with objectives KENMD46-53 and additional specific objectives included within the relevant settlement section. Section 5.1 of the SFRA deals with the Initial Flood Risk Assessment of the land uses as indicated on the zoning map. The tables in Section 5.1 include specific Flood Risk Comments & Recommendations. In general, these recommendations have been transposed into the LAP.

It is considered appropriate to include an additional objective regarding minor proposals for development, for example small extensions to existing houses or changes of use, in areas at moderate to high risk of flooding should be assessed in accordance with Section 5.28 of the Guidelines, incorporating the additional guidance in Planning Circular PL2/2014.

Camping/Glamping; It is noted that Objective KENMD-52 relates to site specific assessments at project level. Flood awareness, warning systems and evacuation procedures are required to be put in place as per this objective, which will be done as part of the site specific assessment.

Register of Key Flood Risk; The Land Use and Flood Risk Management Objectives as contained in Chapter 11 of the KCDP 2022-2028 ensure that flood risk infrastructure is protected. Kerry County Council will continue to work with the OPW, and will have full regard to the development of proposed Flood Relief Schemes, and ensure that zoning or development proposals support and do not impede or prevent the progression of these measures.

Consideration of Climate Change Impacts; It is the intention to include the future scenario mapping for the NIFM as part of the Strategic Flood Risk Assessment.

Nature-based Solutions and SuDS; The KCDP 2022-28 and this Plan recommends the use of SuDS in all developments. This offers a 'total' solution to rainwater management and must be included in all new developments. Objectives relating to Land Use and Flood Risk Management are set out in the Chapter 11 of the KCDP 2022-2028 and shall be adhered to in this LAP. Objectives relating to nature-based solutions to storm water management are set out in Chapter 13 of the KCDP 2022-2028.

In relation to the comments that are specific to the settlements, it is considered appropriate to amend the landuse zoning maps as requested. Regarding the three opportunity sites (CH-11, CH-12 & CH-13) within Cahersiveen, only water-compatible development is permitted within these sites. In the interests of clarity, it is necessary to specify and limit development to only water-compatible development within Flood Zone A and less vulnerable development in Flood Zone B, unless these sites first pass the plan-making justification test (see submission OPR).

In relation to the proposed carpark (N1.6) in Kenmare, at a strategic level, it is considered that the proposed land zoning taken in conjunction with the flood risk management objectives in the LAP are adequate to ensure that proposals would not be likely to adversely impact flood risk in the area. It is considered that the need to consider flood risk in more detail at project level stage is acknowledged and provided for in the LAP.

In relation to Portmagee, it is noted that these lands are zoned O1 (Strategic Reserve), White Land. Since, it is not envisaged to develop this site during the lifetime of this plan, any long term development type will be subject to a precautionary approach to ensure no encroachment onto the watercourses or the floodplains.

It is considered that issues raised in the submission will be addressed/included in the SFRA Addendum Report.

Recommendation:

It is recommended to include a new objective in Section 2.9.2 (Land Use & Flood Risk Management Objectives) as follows;

Ensure that minor proposals for development, (e.g. small extensions to existing houses or changes of use), in areas at moderate to high risk of flooding should be assessed in accordance with Section 5.28 of the Guidelines, incorporating the additional guidance in Planning Circular PL2/2014.

3.1.11 [Submission KE-C8-100](#): DEPARTMENT OF HOUSING, LOCAL GOVERNMENT AND HERITAGE

Submission Summary:

1. The Department requests that all references to “Department of Culture, Heritage and the Gaeltacht” are updated.
2. The name of the UNESCO Tentative List site is the ‘Transatlantic Cable Ensemble’ and this term should be used throughout the Local Area Plan (LAP). Reference should be made to the fact that this is a transnational site with two component parts on the island of Valentia and two component parts in Heart's Content, Newfoundland, Canada.
3. It is stated that the LAP should make clear that the focus of the World Heritage nomination is the permanent cable structures on both side of the Atlantic.
4. It is stated that the LAP should clearly state that the nomination for World Heritage is being brought forward by Kerry County Council and the Government of Newfoundland and Labrador as lead proponents (for one transnational application) in partnership with the National Monuments Service, Parks Canada, the Valentia Island Development Company and Valentia Island Trans-Atlantic Cable Foundation, etc. It is recommended that the wording on Page 31 is changed to reflect this.
5. The Department welcomes the addition of the Slate Yard to the Record of Protected Structures in Kerry.
6. The Department welcomes the proposed extension to the “Transatlantic Cable Ensemble” ACA.
7. The Department notes that the Transatlantic Cable Ensemble ACA protects the character of the related Telegraph Field at Foilhommerum Bay. It notes that the Telegraph Field is not (currently) part of the Transatlantic Cable Ensemble Tentative List site but the inclusion of this site in the ACA is a clear recognition of its importance. It requests that the LAP should make specific reference to the fact that the Telegraph field is where a temporary cable station was constructed when the first successful sustainable cable connection was made in 1866, albeit only in operation for two years. The Department recommends that the maps on page 123 of the previous West Iveragh Plan are incorporated into this new LAP for clarity.
8. The Department states that the LAP should reflect an ambition to conserve (rather than restore) the Cable Station, allowing for appropriate adaptive reuse (i.e. the museum and Innovative Hub) and that any works proposed include reference to the Guidance and Toolkit for Impact Assessments in a World Heritage Context issued by the World Heritage Centre and ICOMOS.
9. The Department welcomes the adoption of the two “Heritage and Culturally Sensitive Areas” identified in the LAP (Page 30). These will help to ensure that the Transatlantic Cable Ensemble and associated sites are protected and managed appropriately
10. It is stated that the LAP should include that the Ensemble was added to both Ireland’s and Canada’s respective Tentative Lists of World Heritage sites in 2022 and it is anticipated that work on the formal nomination will commence in 2024 and will take a minimum of five years.
11. It states that the Western Stone Forts (Staigue Fort) are not on Ireland’s (2022) Tentative List and reference to this should therefore be removed from this document.
12. The Department supports and welcomes a number of specific objectives including KENMD – 21 to 23, KENMD-KS-13, KENMD-PE-7:

In relation to KENMD – 25: the Department recommends that this refer to the “Transatlantic Cable Ensemble” as opposed to “Valentia Cable Sites” and its inscription as an UNESCO World Heritage Property. The Department strongly recommends that it should be stated clearly in the LAP that the term ‘World Heritage Property’ is used by UNESCO in a very specific way to define the area/site that has Outstanding Universal Value, rather than referring to ownership. World Heritage status does not affect ownership or property rights and World Heritage Properties do not become public property; nor does their ownership pass to any international body. Ownership remains as it was prior to inscription, and Irish laws still apply.

KENMD – 26: The Department supports the ambition to support the conservation and presentation of the key cable sites at the old Slate Yard and ‘First Message’ & ‘Telegraph Field’ sites and the Department will be pleased to provide appropriate expert conservation advice. However, it is recommended that this objective include specific reference to the Guidance and Toolkit for Impact Assessments in a World Heritage Context issued by the World Heritage Centre and ICOMOS.

It also notes that Kerry will be unique in Ireland in having potentially two World Heritage Properties situated within sight of each other and it is critical that the management, conservation and presentation of these two properties complement each other and that this is reflected in the LAP. The Department therefore strongly recommends that the UNESCO Sceilg Mhichíl World Heritage Property is individually highlighted in the LAP (for example on page 32) and that a reference to supporting the Sceilg Mhichíl World Heritage Property Management Plan is included in the LAP as a specific objective.

Response:

References in the LAP to the Department of Culture, Heritage and the Gaeltacht will be updated in accordance with the submission in the final LAP.

Kerry County Council fully recognises the wealth of cultural and built heritage within the county. This unique heritage is an intrinsic part of the character and attractiveness of the County and is a catalyst in attracting tourism and investment. It is the policy of the Council in the KCDP 2022-2028 and the LAP to protect this heritage while preserving and/or sustainably promoting their sympathetic renovation and reuse. The Council will ensure that this potential is maximised to ensure that heritage will play a central role in the development of the villages and rural areas of the Municipal District. Importantly, this potential also enhances the visitor offerings for those visiting the area and contributes to the Kenmare MD area in terms of employment, economic and local enterprise. Objective KCDP 5-24 as contained in the KCDP 2022-2028 seeks to enhance, integrate, and protect ... built heritage assets through appropriate and sensitive use now and for future generations.

This application (nomination for World Heritage status) is fully supported by Kerry County Council, and both the KCDP 2022-2028 and the LAP contain policies and objectives to achieve this goal, see Objective KCDP 8-51, facilitate and support measures to secure the designation of Valentia Trans-Atlantic Cable Station, Cable Terrace, “First Message” Building, Structure in the Telegraph Field, and ensemble of associated sites as a trans-national serial UNESCO World Heritage Site with its partner site in Hearts Content, Newfoundland, Canada.

It is noted that the Ensemble was added to both Ireland's and Canada's respective Tentative Lists of World Heritage sites in 2022 and it is anticipated that work on the formal nomination will commence in 2024 and will take a minimum of five years. It is envisaged that the project shall conserve (rather than restore) the Cable Station, allowing for appropriate adaptive reuse (i.e. the museum and Innovative Hub) and that any works proposed include reference to the Guidance and Toolkit for Impact Assessments in a World Heritage Context issued by the World Heritage Centre and ICOMOS.

It also notes that Kerry will be unique in Ireland in having potentially two World Heritage Properties situated within sight of each other and it is the policy of the Council to support the Sceilg Mhichíl World Heritage Property Management Plan. It is considered appropriate to include additional text and an objective supporting same.

It is acknowledged that the Western Stone Forts (Staigue Fort) are not on Ireland's (2022) Tentative List and reference to this should therefore be removed from the LAP.

Having regard to the Telegraph Field at Foilhommerum Bay, the Transatlantic Cable Ensemble ACA protects the character of the related Telegraph Field at Foilhommerum Bay. The Department recommends that the maps in the West Iveragh Plan are incorporated into this new LAP for clarity, this is considered not necessary as details of this ACA, including maps, are included in Volume 3 of the KCDP 2022-2028. It is considered appropriate that the LAP should make specific reference to the Telegraph Field and it is proposed to include additional text regarding this.

With regards to the Heritage & Culturally Sensitive Areas, see response/recommendation in Section 3.3.1.3.

Recommendation:

It is recommended that the LAP refer to the "*Transatlantic Cable Ensemble*" as opposed to "Valentia Cable Sites". This reference will be amended throughout the LAP.

It is recommended to amend objective KENMD-25 as follows;

Support the designation of the ~~Valentia Cable Sites~~ *Transatlantic Cable Ensemble* as an UNESCO World Heritage Site.

It is recommended to amend objective KENMD-26 as follows;

The Department supports the ambition to support the conservation and presentation of the key cable sites at the old Slate Yard and 'First Message' & 'Telegraph Field' sites in accordance with ~~Department of Culture, Heritage and Gaeltacht and UNESCO guidance~~ *the Guidance and Toolkit for Impact Assessments in a World Heritage Context issued by the World Heritage Centre and ICOMOS.*

It is recommended to amend the text of Section 2.6.2.3 as follows;

Funding has been awarded to the ~~Valentia Trans-Atlantic Cable Station~~ *Transatlantic Cable Ensemble* as part of the Rural Regeneration and Development Fund. This project will ~~restore~~ conserve the Valentia Trans-Atlantic Cable Station.

It is recommended that the following text be added in relation to the Telegraph Field in Section 2.6.2.3 as follows;

The Telegraph field at Foilhommerum Bay is where a temporary cable station was constructed when the first successful sustainable cable connection was made in 1866, albeit only in operation for two years.

It is recommended to amend and include the following text in Section 2.6.2.4.2 as follows;

~~The Plan area contains the UNESCO World Heritage Site of Sceilg Mhichíl and Staigue Fort, which is one of three monuments in the county included in the Western Stone Forts nomination on Ireland's 'Tentative Listing'. County Kerry will be unique in Ireland in having potentially two World Heritage Properties situated within sight of each other. it is critical that the management, conservation and presentation of these two properties complement each other. and that this is reflected in the LAP. It is the policy of the Council to support the Sceilg Mhichíl World Heritage Property Management Plan.~~

It is recommended to include a new objective in Section 2.6.2 (Built Heritage Objectives) as follows;

Support the Sceilg Mhichíl World Heritage Property Management Plan.

3.1.12 [Submission KE-C8-166](#): DEPARTMENT OF THE ENVIRONMENT, CLIMATE AND COMMUNICATIONS

Submission Summary:

The Department notes and supports section 1.5.3 of the draft LAP, it welcomes the Local Authority's climate action audit, which provides detail on how the draft LAP aligns with climate action policy.

The Department encourages the Local Authority to further reference the Climate Action Plan 2023 (CAP 2023) throughout the written statement of the draft LAP, while ensuring that the LAP is drafted in a manner consistent with CAP 2023, in accordance with the requirements of Section 15(1) of the Climate Action and Low Carbon Development Act, 2015 (as amended).

The Department encourages the integration of mitigation and adaptation policy and objectives throughout the written statement of the draft LAP. As such, further explicit policy which supports mitigation and adaptation measures throughout the written statement is encouraged, having regard to the CAP 2023, NAF and Long-term Strategy.

The submission outlines that the LAP may present an opportunity to more explicitly support the roll-out of district heating in individual areas or developments. To this end, the department notes specific policies at national, regional and local level that may further the policy objectives of the Local Authority, that can be taken into account when preparing the final Kenmare Municipal District Local Area Plan. The Local Authority is encouraged to examine the potential of district heating including district heating derived from waste heat, where available, technically feasible and cost effective.

The Department encourages the Local Authority to implement policy with regard to the NZEB standard buildings for all new developments, in line with the CAP 2023 and objective of the KCDP 2022-2028. The Department encourages the Local Authority to further consider implementing policy to support the ambitions of the National Residential Retrofit Plan, in particular, the development of the electrification of heating, having regard to the CAP 2023 and the KCDP 2022-2028. As such, explicit policies in support of same are encouraged in the written statement of the Draft LAP.

The Department recommends that the Local Authority further elaborate on the role of domestic scale renewables in the Kenmare Municipal District, in particular, the role of self-consumers, in line with the CAP 2023 and policy in the KCDP, and provide more explicit policy support for such technologies.

The Department encourages further references to the principles of the circular economy throughout the draft LAP, to further this objective of the Local Authority throughout the Kenmare Municipal District. The Department notes the new guidance in respect of construction waste management, titled "Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects". The Local Authority is encouraged, therefore, to consider how such guidance could be incorporated into the policies of the Local Area Plan to give effect to them through the planning system.

The Department encourages the Local Authority to include specific reference to the following in the written statement of the draft LAP:

- Harnessing Digital – The Digital Ireland Framework, which drives and enables the digital transition across the Irish economy and society. Dimension 2 of the framework places importance on supporting 5G rollout across all populated areas of Ireland by 2030.
- National Strategic Objective 6 of the NDP which states that high-quality, secure, and reliable connectivity to global telecommunications networks is of significant strategic importance to the Irish State.

Response:

The Departments comments in relation to the integration of mitigation and adaptation policy and objectives is noted. While the KCDP 2022-2028 strongly supports many of the key points made by the Department, specifically in the policies and objectives in Chapter 12, amendments to the LAP are also proposed in relation to Climate Action.

Recommendation:

It is recommended to include a new section, Climate Action, in Section 2.9 as follows;

Climate Action

In the context of this LAP the integration of climate action policy aligns with the vision, strategic objectives and actions outlined in Kerry County Council's Local Authority Climate Action Plan (LACAP) to be adopted in Q1 of 2024. The LACAP recognises in the context of land use plans, the integration of spatial, transport and energy planning is fundamental to achieving decarbonisation, particularly in the challenging sectors of heating and transport.

Decarbonisation of heating in the built environment across the residential and non-residential sectors is a key challenge for climate action in the context of this LAP. While the Council has taken a proactive approach in the promotion and implementation of energy efficiency initiatives in its own building stock to date, it has challenging targets to achieve public sector targets (a 50% improvement in energy efficiency and 51% cut in emissions) by 2030. Equally, reaching targets for decarbonisation in the private sector will be challenging. While national building regulations will oversee compliance with evolving European energy legislation in existing and new (to NEZB standards) buildings - the LAP can indirectly support initiatives that seek to decarbonise the heating sector at a local level. Here, consolidated growth principles can again facilitate a more cost-effective roll-out of retro-fitting projects at larger spatial scale; and facilitate investigations into potential communal heating schemes, such as district heating schemes, and/or other potential renewable heat sources. The LAP also supports the energy user of the future - the "self" or "pro-consumer" - essentially where energy is consumed close to where it is produced. Many of these self-consumer energy projects are exempted development e.g. installation of solar PV panels. However, the LAP supports community-based generation in line with policy and objectives outlined Chapter 12 of the KCDP 2022-2028 and evolving micro-generation and export to grid legislation.

Regarding the decarbonisation of transport, consolidated growth and the support of the avoid-shift-improve model in the LAP will be key to achieving ambitious transport emissions reductions. This LAP therefore strongly supports "avoid" by ensuring via consolidated growth/high density living in our settlements people reside close to where they work, go to school etc; "shift" by ensuring people can, via, active travel safely walk, cycle or use public transport and by "improve" ensure the Plan supports the roll out of alternative fuels such as EV charging infrastructure.

It is recommended to amend the text of Section 2.3.1 as follows;

It is important to acknowledge that the redevelopment of brownfield sites is inherently more sustainable than the development of greenfield sites and should be encouraged. This principle of consolidated growth is in line with Climate Action Policy as outlined in the Draft Local Authority Climate Action Plan 2024-2029. In the context of this LAP, consolidated growth allows for the provision of more sustainable forms of municipal services such as the decarbonisation of heat at scale. The potential e.g. of district heating schemes or large scale retro-fitting projects that electrify heating at scale, is more economically feasible in consolidated settlements. When discussing redevelopment proposals, it is important to address the potential of these sites for economic development; employment creation and supporting climate action through decarbonisation of two significant sectors – heat and transport.

It is recommended to amend the text of Section 2.3.2 as follows:

The Briefs establish the broad development principles for the areas and set out the general distribution of land uses, circulation systems and key access points. The Briefs also indicate how future land uses should integrate with surrounding development and provide for the future phasing of development. In addition, the brief incorporates the need for future developments to be aligned with climate action policy particularly evolving regulations for Net Zero Emissions Buildings (NZEB) as further EU Directives on energy are transposed.

The Briefs seek to demonstrate, whilst having regard to the existing site context and character, the following:

- Overall layout and distribution of uses and open space on the subject lands;

- *That building design choices will be climate proofed and evaluated in terms of energy performance, energy management, carbon emissions and future operational costs;*
- Principal road infrastructure and access;
- Principal pedestrian and cycle routes and access particularly as they relate to mitigating emissions from the transport sector;
- Improvements to existing road infrastructure; and
- Incorporation of existing features of biodiversity value (e.g hedgerows, trees, watercourses) & enhancement of biodiversity.

The delivery of the above infrastructure/principles are set out in the accompanying maps. The proposals contained in these Briefs have regard to the policies, objectives and standards contained in the LAP and KCDP 2022-2028. The Briefs will be used as a tool for the co-ordinated delivery of development over the coming years *underpinned by climate action policy particularly as it relates to reducing emissions from heating and transport*. It will ensure that development is integrated and designed appropriately in accordance with the proper planning and sustainable development of the area.

3.1.13 **Submission KE-C8-182:** **UISCE ÉIREANN**

Submission Summary:

Uisce Éireann has provided the Local Authority with updates in respect of water supply and wastewater treatment capacities for the various settlements in the LAP. This lengthy detailed submission covers various issues summarised below;

Availability of water services; UE encourages phased sequential development in areas with existing infrastructure and spare capacity and in order to maximise the capacity of existing collection systems that the discharge of additional surface water to combined sewers is not permitted. It also states that UE assets within proposed development site must be protected or diverted.

UE highlight that third-party agreement will be required where it is proposed to service a new development via private property or private water services infrastructure. A list of potentially affected lands is given.

Water Services Infrastructure and Constraints; The submission states that it is envisaged that capacity is available to cater for the projected population growth within the lifetime of the LAP. However, that local network upgrades may need to be delivered in some areas to provide capacity to individual sites.

The submission highlights that there are some constraints in a number of Water Resources Zones. UE has stated that it is working to address these constraints and can provide an update on progress as the LAP process progresses. Information on the current state of progress made to date for the WRZs is set out in the submission.

The submission states that mains rehab works have been identified for the villages of Baile an Sceilg and Beaufort, and the village of Caherdaniel; however, that these works are not ongoing or a priority for 2024.

Wastewater Collection and Treatment Wastewater Treatment Capacity; It is noted that capacity is available in all WWTPs in the larger towns in Kenmare Municipal District to cater for the projected growth within the lifetime of the LAP, apart from Kenmare WWTP where capacity is constrained. However, it is noted that the project is under way to upgrade the Kenmare WWTP is anticipated to be completed in December 2025.

It is highlighted that a project is under way through Uisce Éireann's Small Towns and Villages Growth Programme (STVGP) to upgrade the Knightstown WWTP, UE is also advancing the upgrade of the wastewater treatment system in Glenbeigh (completion by the end of 2024).

The submission highlights that the villages of Beaufort and Chapeltown, and the small villages identified in the LAP are all regarded as unsewered. Uisce Éireann states that it currently has no remit in the area of provision of new infrastructure to unsewered settlements.

Planned road and public realm projects; UE recommends early engagement in relation to planned roads and public realm projects.

Specific comments on the LAP

In Section 2.2.2 the Local Authority should note that the review of water and wastewater capacity has been carried out based on the population projections from the KCDP 2022-2028. Where it has been indicated that a plant has capacity to cater for growth targets, this relates to the targets in the KCDP, but UE states that this may not be sufficient for the housing numbers indicated in the LAP.

The submission states that in relating to Table 2.7 the following changes should be made:

- Water Supply & Wastewater Treatment Capacity Register June 2023 should make it clear that there is no existing WWTP servicing Beaufort and Chapeltown.
- It is stated that Knightstown WWTP should be green based on a project currently underway.
- In Table 2.7 it states that the upgrade of this WWTP is anticipated to be completed in December 2025, amendments to the LAP should be made to reflect this.
- It is stated that for water supply for Kilgarvan should be red and capital investment is required.

It is suggested that in Section 3.2.1.10 relating to surface water be moved to section 2.9.2 (Land Use & Flood Risk Management) and merged with the last sentence on page 46, being "as per the requirements of the KCDP 2022-2028 nature-based solutions to stormwater management are encouraged" or included in the relevant sections for all settlements.

In relation to the Water & Wastewater Management in Kenmare Killorglin & Waterville, UE notes that in respect of capacity during the LAP period given that the estimated housing numbers are significantly greater than the KCDP 2022-2028 housing target.

UE advises that Sneem WTP has capacity based on the demand and the capacity of the WTP. UE states that a long-term plan will be developed and a capital project will be advanced. Also, the Sneem WWPS is included on Uisce Éireann's WWPS Upgrade programme and is currently at detailed design stage.

UE advises that it is not currently expected that a project to upgrade the Dungeagan/Ballinskelligs WWTP will be delivered within the lifetime of the LAP.

Uisce Éireann advises that they are advancing the upgrade of the wastewater treatment system in Glenbeigh as part of the STVGP and that it is currently expected that Stage 2 of the project will be completed by the end of 2024, after that time Uisce Éireann will be better able to give a timescale for completion of the project.

Response:

Uisce Éireann has provided the Local Authority with updates in respect of water supply and wastewater treatment capacities for the various settlements in the LAP. It is noted that in addition to ongoing and planned water services projects, it is likely that further projects will be identified under the preparation of several initiatives.

It is the policy of the Local Authority to work with Uisce Éireann to ensure the provision of services and facilities required for the economic, social and environmental development of the County. The information submitted in relation to capacity and proposed future infrastructural projects have been noted and considered by the Planning Authority, when planning for the future development of the settlements in the Kenmare MD area. It is considered appropriate that Table 2.7 be updated to include these updates in respect of water supply and wastewater treatment capacities for the various settlements in the LAP.

In response to the submission from the OPR, in relation to residential land use zoning, see Section 3.1.1, it is proposed to reduce the quantum of lands zoned for residential development in Kenmare, Killorglin and Waterville, which consequently reduces the housing yield estimates for these settlements, therefore ensuring that the housing targets as set out in the Core Strategy are being met in line with Uisce Éireann's water and wastewater capacity.

The recommendations of Uisce Éireann in relation to Table 2.7 as contained in the LAP are noted. It is therefore considered appropriate to update this table as per the submission based on the latest available data.

The reference to text in Cahersiveen and Killorglin in relation to surface water discharge in new developments being included in Section 2.9.2 is considered appropriate. This is not considered to be a material change and can be included in the final plan.

Comments in relation to the STVGP regarding Baile an Sceilg & Dún Géagáin are noted. The relevant section of the LAP can be updated to reflect that this WWTP is a candidate under the STVGP in the final plan. The Minister for Housing, Local Government and Heritage on December

7th 2023 announced the successful applications, which include Beaufort, under a new funding scheme targeting the waste water collection and treatment needs of villages and settlements without access to public waste water services.

The scheme is funded by a €50 million commitment under the National Development Plan (NDP) to 2025 and this announcement follows the completion of a review of villages and settlements that do not have access to public waste water infrastructure.

In line with the change to Uisce Éireann's updated latest Water Supply Capacity Register, text in relation to Kilgarvan will be updated accordingly in the final plan.

Recommendation:

It is recommended that Table 2.7 be replaced with the following updated table:

Settlement Status	Settlement	WWTP (Headroom)	Water Supply
Regional Town	Cahersiveen		
	Kenmare	*	
	Killorglin		
District Town	Sneem	**	
	Waterville		
Villages	Baile an Sceilg		
	Beaufort	#	
	Chapelstown	#	
	Dún Géagáin		
	Glenbeigh	***	
	Kilgarvan		
	Knightstown	##	
	Portmagee		

* the upgrade of this WWTP is anticipated to be completed in December 2025

no public WWTP present

** WWPS Upgrade programme and is currently at detailed design stage

*** part of the STVGP, project is at Stage 2 – Preliminary Business Case

project to upgrade WWTP being advanced under the STVGP

Key	Capacity available	Potential capacity	No capacity capital investment is required
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3.1.14 Submission KE-C8-207: NATIONAL TRANSPORT AUTHORITY

Submission Summary:

The Submission sets out general comments first on guiding principles, national policy and climate action that should inform and be incorporated into the LAP. Specifically, that the LAP should be guided by and include land use policies and objectives that support the consolidation of urban-generated development within existing urban areas in complement with the integration of land use and transport planning.

The submission states that the LAP should align with national policy documents on modal hierarchy in Ireland, beginning with Active Travel (walking and cycling) and that it should seek the reallocation of road space in appropriate locations in accordance with the road user hierarchy, in order to prioritise walking, cycling and public transport and prioritise the place-making functions of the urban street network.

Specific comments on Draft LAP

It is recommended that statistical profiling of the MD Area and Settlements is based on the Census Data.

The submission recommends that the key statistics from the Census report to be published in early December (Employment, Occupations and Commuting) is included in the final LAP.

Connectivity, Transport & Movement Objectives

With respect to Objective KENMD-58 – preparation of local transport and traffic management plans, the Council is asked to refer to the ABTA guidance as prepared by the NTA and TII as the basis for the preparation of local transport plans. It is stated that while the ABTA approach may be more applicable for larger settlement sizes, the principles underpinning the ABTA approach should be still applied.

The submission sets out the purpose of preparing a local transport plan and the policy objectives that should be addressed in such a plan. It is stated that the transport plan should inform the manner in which future development occurs on the zoned lands specified in the LAP, in terms of scale, sequencing, density, accessibility and layout. It is stated that it is preferable that a local transport plan be prepared in tandem with the preparation of the LAP. If completed subsequently, the Plan should ensure that works specified in Section 3 of the LAP are implemented taking into consideration the guiding principles and national policy objectives listed in the submission. The Council are advised that transport plans should be undertaken in coordination with the relevant NTA transport programmes, including Connecting Ireland and CycleConnects.

Provision of public transport services in rural areas and inter settlement connectivity

In complement with RSES RPOs 29 and 172, the NTA recommends that the draft LAP connectivity objectives includes specific reference to the improvement of inter-settlement connectivity by public transport, by facilitating the implementation of the Connecting Ireland and Local Link

Rural Transport Programmes within the MD area, by facilitating the operation of public transport services between and within settlements and maximising walking accessibility to services through development consolidation within settlements and the enhancement of local connectivity.

The submission refers to The Connecting Ireland: Rural Mobility Plan which is a major national public transport initiative that will increase connectivity, particularly for people living outside the major cities. The submission outlines that the NTA will continue to develop and expand the Local Link Rural Transport Programme.

Modal Share

Submission refers to the modal share targets set out in the LAP under section 2.11.1.1 and states that while the NTA is supportive in principle of targets which seek to increase sustainable transport mode shares, it is not clear how these targets were derived or how they will be further strengthened and informed by the preparation of the LTPs.

It is stated that for movement at intra and inter-settlement levels within the MD area and in its wider context there is an opportunity to explore the commuting patterns through the interrogation of Census 2022 data. The submission states that commuting profiling can be used to better understand the relationship between current land use patterns and associated travel patterns and that in doing this it can also inform both the establishment mode share targets and associated with this the formulation of land use policies of land use policies that can bring about more sustainable travel pattern outcomes as well as the identification of the transport infrastructure and services needed to meet future travel demand.

Response:

Kerry County Council is satisfied that the LAP has been prepared following the various guiding principles as listed in the submission. These principles would also be supported by policies and objectives contained in the KCDP 2022-2028.

Objective KCDP 14-3 as contained in the KCDP 2022-2028 supports and promotes sustainable mobility policies.

The Draft LAP was published in advance of some Census 2022 publications, statistics as contained in the Draft LAP will therefore be updated before the final plan is published, and it is considered that this would not be a material change.

It is an Objective, KENMD-58, to prepare Local Transport & Traffic Management Plans for the settlements as appropriate. The submission from the NTA is acknowledged in relation to these plans, and this objective can be amended to include reference to the principles of the ABTA approach.

The comments of the NTA in relation to provision of public transport services in rural areas and inter settlement connectivity are noted, and their recommendation to include an additional objective is acceptable.

Modal share targets are included in Table 2.9 of the LAP. The baseline figures used are from the 2016 Census as the Draft Plan was prepared in advance of the publication of Census 2022 figures for transport/commuting. The baseline figures in Table 2.9 will be updated before the final plan is published to refer to Census 2022 figures. The submission from the OPR in relation to the modal share targets, see Section 3.1.1, suggests that interim targets be achieved over the plan period. As part of updating Table 2.9, a target for the end of the LAP can be extrapolated. It is considered that an update to Table 2.9 would not constitute a material amendment to the LAP.

Recommendation:

It is recommended to amend Objective KENMD-58 as follows;

Prepare Local Transport & Traffic Management Plans for the settlements as appropriate, *following the principles of the ABTA approach as set out by the National Transport Authority and Transport Infrastructure Ireland.*

It is recommended to include a new objective in Section 2.11 (Connectivity Objectives) as follows;

Facilitate the implementation of the Connecting Ireland and Local Link Rural Transport programmes within the MD area, by facilitating the operation of public transport services between and within settlements and maximising walking accessibility to services through development consolidation within settlements and the enhancement of local connectivity.

3.2 Settlement Submissions

3.2.1 Cahersiveen

3.2.1.1 [Submission No. KE-C8-2](#): JACK FITZPATRICK

Submission Summary:

The submission raises concerns that once completed the increase in tourists and users of the greenway would require an increase in parking capacity and an overall provision of new car parks. The submission makes a suggestion as to the potential location for such car parks as follows:

- The current proposed car park at the Marina.
- A second car park at New Street. The area close to Fertha Drive may prove suitable as there is an access lane between St Mary's GAA Club and the estate that could provide bicycle access onto the Greenway.
- A third car park at East End. There is ample area by the fire station to provide parking within easy access to the Greenway.

The submission also states that there is a lack of available housing in the Cahersiveen area, the allocation of 101 units up until 2029 is insufficient to meet the current demand. A lack of tourist accommodation in Cahersiveen is also outlined in the submission, and that more flexibility should be given to allow for greater use of short term lettings to meet the existing and future tourist accommodation demands in Cahersiveen.

Response:

Kerry County Council are committed to carrying out parking surveys in Cahersiveen to determine the need for additional parking. It is proposed to zone additional lands for car parking in Cahersiveen on a site adjacent to the fire station.

Adequate lands have been zoned within the settlement boundary for either C5 (tourism and related uses), M2 (town centre) or M4, (built up area) that can potentially cater for tourism accommodation and associated facilities such as parking.

The LAP has designated 4.7ha for residential use which is in compliance with the Core Strategy as contained in KCDP 2022-2028. It is envisaged that at least 30% of all new housing development in Cahersiveen shall take place on infill and brownfield sites. Adequate lands have been zoned within the settlement boundary of Cahersiveen for proposed residential use.

Recommendation:

It is recommended to amend the Cahersiveen zoning map from M4 Built Up Area to N1.6 Car Parking, see Amendment 15 in Section 4.4.2.

3.2.1.2 [Submission No. KE-C8-10](#): NICHOLAS BROWNE

Submission Summary:

The submission states that the lands identified in the submission, which are located to the east of Cahersiveen (Holy Cross) Burial Ground, are suitable for development and would be suitable for the development of social and affordable housing.

Response:

Sequential development is an overarching objective in sustainable planning. To achieve a more compact town a sequential approach must be adhered to while also prioritising sustainable development. This site is located outside the settlement boundary, and notwithstanding its proximity to existing residential and other mixed uses, it is considered that there are other more suitable infill sites that should be developed first. To zone lands in the environs on the town would contravene objectives contained in the LAP.

In addition, having regard to the submission from the OPR, it would not be in accordance with the proper planning and sustainable development of Cahersiveen to zone additional lands for residential development at this location.

Recommendation:

No amendment proposed.

3.2.1.3 [Submission No. KE-C8-26:](#) ALAN LANDERS**Submission Summary:**

This submission considers that there will be a shortfall of parking facilities within the town of Cahersiveen. While all the concentration for development seems to be within the town and Marina areas maybe some consideration should be afforded to the Valentia Road area on the Western side of the Town where there is a possible site available for redevelopment subject to it being rezoned from light industrial to mixed use. This site could provide a large parking facility. It would also serve as a possible Trail Head on the Western Side of Cahersiveen with parking and other business co existing.

Response:

As per the land use zoning matrix, attached in Appendix B of the LAP, all the lands zoned within the settlement boundary permit car-parking in principle or are open to consideration to car parking. Specifically, it should be noted that all the M1, M2, and M4, mixed use zonings permit car parking. Therefore, there are extensive zonings which permit car-parking facilities.

Also, see response/recommendation to Submission KE-C8-2 in Section 3.2.1.1.

Recommendation:

No amendment proposed.

3.2.1.4 [Submission No. KE-C8-64:](#) MICHAEL KEATING & ELAINE CLIFFORD**Submission Summary:**

The submission requests the rezoning of a site in Cahersiveen currently zoned as C2.1 (Industrial/Enterprise) to a mixed-use zoning incorporating M2, M3, and M4.

Response:

This site is located to the rear of the Mr Price retail outlet and adjacent to St Marys GAA pitch.

The site is zoned C6 on the printed zoning map for Cahersiveen, but there is an errata on the legend which states C2.1 rather than C6. The colour of the site on the map is that of a C6 zoning and not C2.1. It is considered that having regard to the established uses in the area, to the location of the land adjoining the proposed greenway and the potential for future development, and the land use zoning matrix as contained in Appendix B of the LAP, that a flexible approach to development on this site is allowed for by a C6 Mixed/General commercial/industrial/enterprise zoning. It allows for a broad range of uses that would be appropriate at this location. It is considered that a mixed use zoning would not be appropriate given its edge of town location.

Recommendation:

No amendment proposed.

3.2.1.5 Submission No. KE-C8-69: DONAL O'SULLIVAN**Submission Summary:**

The submission requests the following:

1. Consideration should be given to the creation of training colleges locally in apprenticeships / hospitality/IT /etc.
2. Traffic management in light of the greenway, and bus parks and car parking should be provided outside the town at both ends and the introduction of bus shelters, sheltered seating and bike lanes
3. Public colour coded rental bikes should be introduced for use in the town.
4. Reduce the use of single use plastic and suggests that drinking water be made available free of charge at several points throughout the town as well as along the Greenway.
5. Cyclists and walkers who travel up Bridge Street and turn right for town centre should be enabled to travel through the church grounds to O Connell St. This would also encourage a lot more tourists to visit and enjoy the beauty of our impressive church.
6. Interpretative centre to celebrate the life and times of the great Monsignor O Flaherty.
7. Small business work spaces be made available for rental close to the town to encourage local endeavour.
8. Encourage more people to convert empty town buildings back to homes for families.

Response:

The LAP actively supports putting in place the necessary supporting infrastructure for the South Kerry Greenway, including the sustainable development of car parking spaces at suitable locations as per objective no. KENMD-CH-39. Kerry County Council are committed to carrying out parking surveys in Cahersiveen to determine the need for additional parking, see also response/recommendation to Submission KE-C8-2 in Section 3.2.1.1.

It is noted that as set out in section 3.2.1.12.1 of the LAP, it is proposed to develop a Movement Management Plan (currently under preparation) that best accommodates vehicles, cyclists and pedestrians. The Movement Management Plan including one-way systems, cycleways and pedestrian facilities forms part of the Public Realm Plan, the Public Realm Design Strategy and the Town Centre Regeneration Project. In addition, objective KENMD-CH-37 seeks to sustainably promote a more pedestrian and cyclist friendly environment through the provision of traffic calming measures and improved pedestrian and cyclist infrastructure and seeks to Improve pedestrian and cyclist linkages and movement between the marina/waterfront area & the town centre. It is anticipated that private operators will enter the market and supply bike rental in Cahersiveen similar to what has happened where greenways have been developed to date.

There are a number of schemes in operation which encourage (through financial supports) the conversion of buildings back into residential use, including The Croí Cónaithe scheme, and as per Section 3.2.1.5.4 Additional Town Renewal and Regeneration Measures of the LAP it is noted that development consisting of the conversion or renovation of upper floors of buildings into residential use in areas zoned as Town centre are exempt from development contributions as per the Kerry County Council Development Contributions Scheme 2017, in addition a reduction in development levies also applies to areas/streets that are identified in this LAP for renewal and regeneration – New Street and the north side of New Market Street.

The Council has put measures in place through the LAP – appropriate mixed-use zonings, regeneration areas, opportunity sites and extensive measures to encourage and to improve the built environment which it is hoped will encourage and facilitate local enterprise and employment and business activity in the town and surrounding area. Specifically objective KENMD-CH-23 seeks to facilitate the development of local enterprise units so that local and indigenous industries have the opportunity to develop.

With respect to the request for an interpretative centre to celebrate the life and times of Monsignor O Flaherty, the Council will continue to engage with and facilitate as much as is possible local groups wishing to promote their area.

Recommendation:

No amendment proposed.

3.2.1.6 Submission No. KE-C8-79: EAMONN CASEY

Submission Summary:

The submission primarily relates to the Greenway project and opportunity sites in Cahersiveen. The submission suggests that in order for the greenway to be successful bike lane systems, numerous pathways to the town and access to parking (on the western side of the town) with a traffic management plan is required.

The submission proposes the inclusion of another opportunity site, west of the GAA grounds which is zoned C2.1 for light Industrial use.

Response:

See response/recommendation to Submission KE-C8-69 in Section 3.2.1.5.

A number of opportunity sites have already been identified in the LAP which are considered a priority for development and integral to the strategic development of Cahersiveen, hence the opportunity site designation. It is not considered there is further need to designate additional opportunity sites in Cahersiveen as the zonings can accommodate a variety of employment/enterprise uses.

Recommendation:

No amendment proposed.

3.2.1.7 [Submission No. KE-C8-91:](#) MICHELLE OSBORNE**Submission Summary:**

The submission seeks the provision of a skate/scooter/bike park in Cahersiveen, particularly given the greenway being introduced to the town.

Response:

The provision of community facilities, which can cater for the demands of an increasing population, and which will be accessible for all sectors and age groups of the population is a central element in the delivery of sustainable communities. Objective KENMD-CH-8 seeks to support & facilitate the sustainable development of community facilities within the town. The Council will normally favour any development proposals for sustainable recreational and community facilities in appropriate locations and will work with relevant community groups in pursuing such projects including the development of a skate/scooter/bike park.

Recommendation:

No amendment proposed.

3.2.1.8 [Submission No. KE-C8-92:](#) KIM ELLIOT**Submission Summary:**

The submission seeks the provision of a leisure centre including an indoor swimming pool and wellness centre, in Cahersiveen.

Response:

The provision of community facilities, which can cater for the demands of an increasing population, and which will be accessible for all sectors and age groups of the population is a central element in the delivery of sustainable communities. The Council will normally favour any development proposals for sustainable recreational and community facilities in appropriate locations. Objective KENMD-CH-7 seeks to facilitate the development of swimming facilities in Cahersiveen at an appropriate location.

Recommendation:

No amendment proposed.

3.2.1.9 Submission No. KE-C8-93: LUCY O'SULLIVAN**Submission Summary:**

This submission deals with the following issues:

1. Consideration should be given to the creation of training colleges locally in apprenticeships / hospitality/IT /etc.
2. Car park should not be placed by the Marina as this contradicts the plan to reorientate the town towards the waterfront but on the Eastern and Western edges of the town.
3. Bus service - provision of a local circulatory transit service that would travel through the centre of the town and stop at a number of drop-offs points
4. An outdoor bike rental scheme should be installed in the town similar to Dublin Bikes and bike lanes should be protected by curbs and or bollards
5. Suggests that drinking water be made available free of charge at several points throughout the town
6. Walls around the church should be removed in order to improve the public realm.
7. Monument should be erected to celebrate the life and times of the great Monsignor O Flaherty.
8. High density housing should be provided on the New Street/Barr na Sraide site.

Response:

See response/recommendation to Submission KE-C8-69 in Section 3.2.1.5.

The Planning Authority is committed to facilitating increased densities with developments that provide for a mix of unit types to meet the needs of the changing demographic trends and household profiles in the towns. The Planning Authority is required to have regard to Section 28 Guidelines with respect to densities and compact growth to 'Sustainable Residential Development in Urban Areas Guidelines and in particular to the Specific Planning Policy Requirements (SPPR), set out in the Urban Development and Building Heights Guidelines for Planning Authorities, (2018) and the Apartment Guidelines (2018). The LAP also has reference to circular letter NRUP 2/2021 regarding residential densities in towns and villages.

Recommendation:

No amendment proposed.

3.2.1.10 Submission No. KE-C8-94: KAY ROCK FISHING LTD.**Submission Summary:**

The submission suggests improving access to Cahersiveen Pier which could be facilitated with the introduction of the greenway.

Response:

It is recognised in Section 2.11.2 of the LAP that Cahersiveen is important as a centre of the fishing fleet and ancillary services. The safeguarding and enhancement of its role as a location for appropriate investment and employment opportunities is an objective of the KCDP 2022-2028. The improvement of access to the Pier in Cahersiveen would therefore be supported by the policies of Kerry County Council as contained in the Development Plan and Local Area Plan.

Recommendation:

No amendment proposed.

3.2.1.11 Submission No. KE-C8-109: SUSAN O'SULLIVAN**Submission Summary:**

The submission highlights the importance of the regeneration of the town and area of Cahersiveen for its people, enhancing social, educational and tourism facilities as the main economic opportunity. The submission suggests the following:

- Instalment of significant public transport and cycle support to enhance Cahersiveen quality of life.
- Repopulation of the town centre using existing buildings, with new builds to follow.
- Install Park and Ride outside the town at East and West Ends.
- Provision of continual HopON HopOff commuter bus, accessible to all abilities and ages.
- Upgrade planning pathways and regulations to encourage immediate regeneration of infill sites & buildings with decisive action on vacant and derelict properties.
- Removal of on street parking to enhance human pace circulation of commuter bus and bicycles.
- Installation of very significant continual protected cycle ways throughout the town connecting to park stations and cycle ways on approaching roads.

Response:

See response/recommendation to Submission KE-C8-69 in Section 3.2.1.5.

Recommendation:

No amendment proposed.

3.2.1.12 Submission No. KE-C8-112: SHANE LYNCH**Submission Summary:**

The submission requests the zoning of a 3.4ha site for tourism and related, with potential for it to link to the South Kerry Greenway. The site is located adjacent to the outdoor sports centre at Castlequin, Cahersiveen.

Response:

These lands are located outside of the development boundary of Cahersiveen, to the north of the river, which are accessed via a narrow road bridge with no pedestrian footpath. The development of this site would result in increased car dependency and the creation of unsustainable traffic patterns in an area where there is an absence of public infrastructure including footpaths.

A glamping/camper van development for this site would be required to comply with Section 10.3.5.1 of the KCDP 2022-2028 which covers Camping/Glamping, Campervans and Caravans. It is the policy that the Council considers that camping sites should be located on appropriately zoned land within established/or adjacent to existing settlements, proportionate camping sites may be appropriate to 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. This is supported by the following objective:

KCDP 10-31 Support the 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.

There is therefore support in the KCDP 2022-2028 for such developments in appropriate locations.

Recommendation:

No amendment proposed.

3.2.1.13 [Submission No. KE-C8-123: COLIN WALSH](#)**Submission Summary:**

The submission highlights the need for dedicated spaces for wellness activities such as meditation, yoga, massage and mindfulness etc. in Cahersiveen, and that sufficient spaces be dedicated and zoned for such purposes and for other small and medium enterprises and social economy activities. It further states that the LAP should provide a supportive framework for the development and growth of such facilities – for economic, social and health gains.

Response:

The provision of community facilities, which can cater for the demands of an increasing population, and which will be accessible for all sectors and age groups of the population is a central element in the delivery of sustainable communities. Objective KENMD-CH-8 of the LAP seeks to support & facilitate the sustainable development of community facilities within the town. The Council will normally favour any development proposals for sustainable recreational and community facilities in appropriate locations.

The Council has put measures in place through the LAP - appropriate mixed-use zonings, regeneration areas, opportunity sites, extensive measures to encourage and to improve the built environment which will it is hoped will encourage and facilitate local enterprise and employment and business activity in the town and surrounding area.

Recommendation:

No amendment proposed.

3.2.1.14 Submission No. KE-C8-125: CHERRYHILL DEVELOPMENTS**Submission Summary:**

The submission relates to a request for residential zoning of sites at Castlequinn and Carhan Road in Cahersiveen. The submission outlines the planning history associated with the Castlequinn site.

Response:

One part of these lands is located outside of the development boundary of Cahersiveen, to the north of the river, which are accessed via a narrow road bridge with no pedestrian footpath. Adequate lands have been zoned within the settlement boundary of Cahersiveen for proposed residential use. To zone this site for additional residential development is not considered appropriate having regard to its distance from the town centre and important services such as educational, health and retail for example. The development of this site would result in increased car dependency and the creation of unsustainable traffic patterns in an area where there is an absence of public infrastructure including footpaths. The Planning Authority is unable to consider the zoning of lands that are not in accordance with the Tiered Approach to Zoning as it would contravene Objective KCDP 3-6 of the KCDP 2022-2028.

The submission from the OPR (see Section 3.1.1) states they are satisfied that the land use zonings and potential housing yield for Cahersiveen are generally consistent with the Housing Supply Targets provided in the Development Plan Core Strategy. A proposal to increase the amount of zoned land in Cahersiveen would therefore be contrary to the OPR submission. The lands are not sequential in terms of the development of Cahersiveen, which also applies in relation to the second part of the lands on Carhan Road, outside of the settlement boundary on the eastern side of the town.

To zone additional lands for residential in Cahersiveen as requested in the submission would contravene the Core Strategy as contained in the KCDP 2022-2028, and having regard to the submission from the OPR, it would not be in accordance with the proper planning and sustainable development of Cahersiveen to zone additional lands for residential development at this location.

Recommendation:

No amendment proposed.

3.2.1.15 Submission No. KE-C8-132: PAUL AMEY**Submission Summary:**

The submission suggests upgrades to the Barracks building in Cahersiveen, including better experience for tourists, working lift, shop or cafe and suggests that it would make a great local museum. The submission also seeks the reinstatement of the Skellig Star to its former role of Hotel and Leisure Centre.

Response:

The content of the submission is noted. The Council has no role in the operation of The Old Barracks and in the operation of a private hotel. However, the Local Authority through its policies and objectives set out in the LAP and KCDP 2022-2028 is supportive of and will facilitate the sustainable extension and diversification of tourist facilities throughout the town as set out in Section 3.2.1.9 of the LAP.

Recommendation:

No amendment proposed.

3.2.1.16 Submission No. KE-C8-144: PROF. UTE RÖSELER & HAJO PIRENZ**Submission Summary:**

This submission objects to the proposed plans for Cahersiveen Public Realm Enhancement, and the submission wants to ensure that their concerns meet the Cahersiveen Local Area Plan, especially:

- No on-street parking on main street, but enhance car parks
- Integration of Main Street into “Cahersiveen Town Centre Regeneration Project” (Fig. 3.8)
- No removal of zebra crossing

Response:

The contents of the submission are noted. The Cahersiveen Public Realm Enhancement Plan including the Movement Management Plan is a separate plan to the LAP and will undergo its own Part 8 process. The Movement Management Plan to which this submission relates is currently under preparation will be put on display and submissions invited from the public.

Kerry County Council are committed to carrying out parking surveys in Cahersiveen to determine the need for additional parking, see also response/recommendation to Submission KE-C8-2 in Section 3.2.1.1.

Recommendation:

No amendment proposed.

3.2.1.17 Submission No. KE-C8-148: BEN O'CONNOR**Submission Summary:**

This submission requests that an area of land in Cahersiveen off Quay Street is zoned for residential development.

Response:

The subject site is located adjoining an established residential estate, Marian Place, within the town core adjoining the Marina and within easy walking distance to all services and facilities. It is considered that an amendment to the zoning from G1 to R1, a site area of approx. 0.4 hectares, can be considered in this case as it would contribute to the compact growth of Cahersiveen due to its infill nature.

It is considered that in order to reflect constraints that apply to this site, which would be required to be addressed as part of an application on this site, additional text is required in the LAP to reflect this.

Recommendation:

It is recommended to amend the Cahersiveen zoning map from G1 Open Space, Park to R1 New/Proposed Residential, see Amendment 16 in Section 4.4.3.

It is recommended to include a new section, Residential Lands on Marina Road, in Section 3.2.1.5 (Town Centre) as follows:

3.2.1.5.6 Residential Lands on Marina Road

This site is located between Marina Road and Marian Place/St. Joseph's Terrace. The site together with the adjoining lands to the south are strategically located in close proximity to the town centre, the marina and the proposed South Kerry Greenway. The site which is located on a rocky outcrop elevated over the waterfront can be considered a landmark one. Potentially, the site presents an opportunity to provide for a mixture of residential units but also for tourism/recreational use that could serve the needs of the Greenway users or visitors to the Dark Sky Reserve in a sustainable manner and within walking distance of the town centre.

There are development constraints associated with the site, which should be addressed as part of any planning application, including the following.

- Topography: This is a prominent site, which is elevated above and overlooking the waterfront. The site along Marina Road is mainly dominated by a steep rockface. Any proposal for these lands should be designed to a high architectural standard. A detailed design statement is required outlining how the proposal would both provide a local landmark development and satisfactorily integrate into the townscape/landscape.*
- Amenities: Development proposals should seek to improve the amenities of the area and should not unduly impact existing residential amenities.*
- Access: Limited vehicular access is currently available via Marian Place and pedestrian connectivity onto Marina Road. Detailed proposals should be provided for access and servicing arrangements. This may involve localised road widening requirements. Pre-planning consultation with the Area Engineer is also advised.*

- *Archaeology: The eastern end of the site contains a monument (souterrain) listed on the Record of Monuments and Places. A buffer zone between the monument and a development proposal may be required. Any such buffer should be satisfactorily incorporated into the overall development proposal.*
- *Biodiversity: This site contains semi-natural vegetation likely to be of some ecological interest. Development proposals shall be accompanied by an ecological impact assessment report and shall incorporate biodiversity considerations into the project design.*

3.2.1.18 **Submission No. KE-C8-149: DARAGH O'DRISCOLL**

Submission Summary:

This submission welcomes the Draft Local Area Plan. The submission identifies that there is a lack of tourist accommodation in Cahersiveen and it requests that land is zoned for the development of a hotel in the town. The submission also supports the plan for regeneration of the town which includes knocking the wall of the church which would open up the town, make it more attractive, and a more welcoming place.

Response:

The content of the submission is noted. A number of sites have been zoned for C5 Tourism and related uses in the town. It should also be noted that a hotel development is open for consideration or permitted in principle on all mixed use and residential zoned lands as well as the C5 Tourism & Related zoned lands. Ample provision has therefore been made in the LAP for hotel development and other tourist accommodation facilities should they be proposed.

Recommendation:

No amendment proposed.

3.2.1.19 **Submission No. KE-C8-171: CAHERSIVEEN COMMUNITY AND BUSINESS ALLIANCE**

Submission Summary:

This submission supports the expansion of the town boundaries, increased zoning for residential development, enhanced zoning provision for tourism, and the addition of more off-street parking. The submission welcomes the LAP's statements on climate change, and would like to see sustainable development principles and the UNSDGs being clearly articulated and enforced across the Plan's aims and objectives. The submission believes that there is a need to expand the town boundary to increase zoning for tourism related activities and accommodation. Due to in-migration, the population targets need to be revised upwards by 30% to acknowledge current demographic trends which results in the proposed 101 additional dwellings falling short of requirements, the submission therefore requests additional zoning.

Response:

The Content of the submission is noted. The population projection figures set out originally in the KCDP 2022-2028 have 'headroom' provision inbuilt. Consequently, more lands than considered necessary has been zoned for development to ensure adequate supply. Should lack of supply of zoned lands become an issue over the lifetime of the LAP, the Council can then consider zoning additional lands to facilitate the need.

A number of sites have been zoned for C5 Tourism and related uses in the town. It should also be noted that tourist accommodation and other tourist related activities are open for consideration or permitted in principle on all the M1, M2, M4 and R Residential zoned lands as well as the C5 Tourism and related zoned lands. Therefore, ample provision has been made in the LAP for tourist related activities and accommodation facilities should they be proposed.

In addition to proposed lands for residential and other uses that are greenfield in nature, there are brownfield areas that can accommodate development. The Council therefore considers that there is sufficient lands zoned for residential development and tourist accommodation in the town to meet future demand.

Recommendation:

No amendment proposed.

3.2.1.20 Submission No. KE-C8-181: DAN O'SULLIVAN

Submission Summary:

This submission contains a number of suggestions for Cahersiveen. It is suggested the car parking should be located on the edge of the town in order to free up existing car parks as civic spaces, along with a local bus service could be provided. The submission suggests that Cahersiveen should have a bike rental scheme, bike parking, and that bike lanes are needed. A statue to Monsignor Hugh O'Flaherty is requested. An issue with permeability through the church grounds is identified in the submission. The submission identifies an opportunity for education provision in the town for school leavers. The submission proposes that an increase in density is required regarding residential development and suggests changes to figure 3.15 to provide a streetscape.

Response:

See response/recommendation to Submission KE-C8-69 in Section 3.2.1.5. Also see response/recommendation to Submission KE-C8-93 in Section 3.2.1.9.

Recommendation:

No amendment proposed.

3.2.1.21 Submission No. KE-C8-187: ELAINE O'SULLIVAN

Submission Summary:

The submission states that facilities for young people are lacking in the town of Cahersiveen and the development of swimming facilities in the town as set out under objective KENMD-CH-7 is strongly supported. It is stated that at present people must travel to Killarney and or Tralee to swim or attend swimming lessons. A swimming pool would be of great benefit to all sections of society and would have health and mental health benefits.

It is stated that facilities for Wellness activities and Outdoor pursuits (land and sea) are needed, which could be linked as an attraction for people using the Greenway and be of benefit to locals alike.

Response:

The content of the submission is noted. The provision of community facilities, which can cater for the demands of an increasing population, and which will be accessible for all sectors and age groups of the population is a central element in the delivery of sustainable communities. The Council will normally favour any development proposals for sustainable recreational and community facilities in appropriate locations, as supported by objective KENMD-CH-8.

Recommendation:

No amendment proposed.

3.2.1.22 Submission No. KE-C8-199: LAURA-KATE (LK) HOWELLS

Submission Summary:

This submission puts forward a number of recommendations that it is considered would lead to a more diverse, inclusive, and optimistic future for Cahersiveen.

A range of community facilities are suggested: from a designated community space, a recycling centre to facilitate the rescue of usable items in line with the principles of waste management and the circular economy, to a free trading space in a central location for local artists, creators and farmers and the development of an urban farm in the town.

Sustainable Infrastructure:

The submission recommends prioritising sustainable transport options, including cycle paths and bike stations equipped with water refills, bike pumps, and secure bike parking. It is stated that this would not only promote a healthier lifestyle but also enhance safety, especially with the greenway's arrival.

Marina Transformation:

The submission states that the marina holds great potential as a space to promote tourism and celebrate our marine heritage. The submission highlights the success of the blueway in Copenhagen as an example, where the area could be utilised for local markets, food stalls, accommodating innovative housing solutions.

Response:

The content of the submission is noted. The provision of community facilities, which can cater for the demands of an increasing population, and which will be accessible for all sectors and age groups of the population is a central element in the delivery of sustainable communities. The

Council will normally favour any development proposals for sustainable recreational and community facilities in appropriate locations, as supported by objective KENMD-CH-8.

It is noted that as set out in Section 3.2.1.12.1 of the LAP, it is proposed to develop a Movement Management Plan (currently under preparation) that best accommodates vehicles, cyclists and pedestrians.

The Movement Management Plan including one-way systems, cycleways and pedestrian facilities forms part of the Public Realm Plan, the Public Realm Design Strategy and the Town Centre Regeneration Project. In addition, objective KENMD-CH-37 of the LAP seeks to sustainably promote a more pedestrian and cyclist friendly environment through the provision of traffic calming measures and improved pedestrian and cyclist infrastructure and seeks to improve pedestrian and cyclist linkages and movement between the marina/waterfront area & the town centre.

It is agreed that the Marina area holds great potential and consequently the Council will actively support and facilitate appropriate development in the area as set out in Sections 3.2.1.5.2 and 3.2.1.5.3 of the LAP.

Recommendation:

No amendment proposed.

3.2.1.23 Submission No. KE-C8-206: MICHAEL O'DRISCOLL

Submission Summary:

Population/Town Boundaries

The submission states that the text referring to the population decline of Cahersiveen set out under section 3.2.1.4 is incorrect. It is stated that according to Census 2022 the town has seen an overall increase and to note that this does not include people living in Lighthouse view and surrounding areas. It is stated that the town boundaries do not incorporate the area marked on the attached map, though it is stated that its population totalling 165 is included when speaking about the overall population of Cahersiveen town.

The submission urges the Council to be consistent in its approach to defining the town in terms of both its population and boundaries and correctly represent the true population when incorporating other significant residential.

Housing

It is stated that with the influx of refugees and others to the town that the population targets set out in the LAP have already been exceeded. Therefore, it is requested that the population targets be revised upwards to acknowledge the current demographic realities and the desire of many migrants to stay here and to build / buy homes. The submission states that it is essential to increase the zoning provision and to include a broader range of affordable and social housing options.

Off street parking

It is stated that Cahersiveen's parking infrastructure is inadequate. The Council are requested to zone and provide for more off street parking in order to ensure the town's economic growth. A site is suggested adjacent to Old Road.

Cahersiveen Town Centre Regeneration Project

The benefits of the regeneration project to transform the town centre and river front area in terms of its potential for business, residential and community is noted and welcomed.

Response:

The content of the submission is noted. The population projection figures set out originally in the KCDP 2022-2028 have 'headroom' provision inbuilt. Consequently, more lands than considered necessary has been zoned for development to ensure adequate supply. Should lack of supply of zoned lands become an issue over the lifetime of the LAP, the Council can then consider zoning additional lands to facilitate the need.

The LAP actively supports putting in place the necessary supporting infrastructure for the South Kerry Greenway, including the sustainable development of car parking spaces at suitable locations as per objective no. KENMD-CH-39 of the LAP. Kerry County Council are committed to carrying out parking surveys in Cahersiveen to determine the need for additional parking, see also response/recommendation to Submission KE-C8-2 in Section 3.2.1.1.

In addition, a Movement Management Plan is currently under preparation which seeks to improve the movement of pedestrians, cyclists and motorists in and around the town. This plan will be put out for public consultation and submissions will be invited.

Recommendation:

No amendment proposed.

3.2.1.24 [Submission No. KE-C8-209: WILLIAM O'DRISCOLL](#)**Submission Summary:**Off Street Parking

The submission requests that additional off-street parking be provided, in order to ensure the town's economic growth. It is suggested that the Council purchase lands adjacent to Old Road to provide additional parking.

Housing

It is stated that with the influx of refugees and others to the town that the population targets set out in the LAP have already been exceeded. Therefore, it is requested that the population targets be revised upwards to acknowledge the current demographic realities and the desire of

many migrants to stay here and to build / buy homes. The submission states that it is essential to increase the zoning provision and to include a broader range of affordable and social housing options.

Cahersiveen Town Centre Regeneration Project

The submission states that the proposal to remove the Church wall must be included in the final planning application. It is stated that such an initiative will create an open and safer environment in the centre of the town, providing much needed wider pedestrian access, whilst fostering a stronger church and community relationship.

Response:

The content of the submission is noted. See response/recommendation to Submission KE-C8-206 in Section 3.2.1.23.

Recommendation:

No amendment proposed.

3.2.1.25 Submission No. KE-C8-213: PETER SHALLOW

Submission Summary:

Submission requests that the speed limit on both The Rocky Road and Top Street/Barr Na Sráide be reduced, that the current 80km per hour speed limit is too fast the existing road conditions and limited opportunities to pull in safely. Requests that adequate pathways and cycle lanes be repaired/built, taking into account special consideration for wheelchair users and the visually impaired.

Submission sets out a number of requests as below:

- An outdoor swimming pool, a Leisure Park, other leisure/sport facilities such as a driving range, pitch and putt course, tennis courts, padel courts, etc. Suggested locations given.
- Requests that an allotment style Community Garden be built where people can grow their own food and cook and eat communally, in a socially inclusive setting.
- Requests that the old School/Community Hall be purchased into a useful space for that could host plays and musicals for the school and wider Community.
- Requests that new accommodation for tourists and residents be built. Submission highlights the level of derelict buildings in the surrounding area which could be repurposed as homes.

Response:

The content of the submission is noted. A Movement Management Plan is currently under preparation which seeks to improve the movement of pedestrians, cyclists and motorists in and around the town. Issues in relation to speed limits in the town can be raised as part of the public engagement on the Movement Management Plan.

The provision of community facilities, which can cater for the demands of an increasing population, and which will be accessible for all sectors and age groups of the population is a central element in the delivery of sustainable communities. Objective KENMD-CH-8 seeks to support & facilitate the sustainable development of community facilities within the town. The Council will normally favour any development proposals for sustainable recreational and community facilities in appropriate locations and will work with relevant community groups in pursuing such projects sports and leisure facilities.

The Council does not have any role in constructing tourist accommodation but rather sets out the conditions through zonings, policies and objectives to facilitate development in appropriate locations. It is noted that a number of sites have been zoned for C5 Tourism and related uses in the town. It should also be noted that tourist accommodation and other tourist related activities are open for consideration or permitted in principle on all the M1, M2, M4 and R Residential zoned lands as well as the C5 Tourism and related zoned lands. Therefore, ample provision has been made in the LAP for tourist related activities and accommodation facilities and should they be proposed.

With respect to derelict buildings in the town, it is noted that there is a dedicated Derelict's Site's Unit within the Council which is actively seeking to tackle derelict buildings/sites. Further there are a number of schemes which encourage (through financial supports) the conversion of buildings back into residential use, including The Croí Cónaithe scheme, and as per Section 3.2.1.5.4 Additional Town Renewal and Regeneration Measures of the LAP it is noted that development consisting of the conversion or renovation of upper floors of buildings into residential use in areas zoned as Town centre are exempt from development contributions as per the Kerry County Council Development Contributions Scheme 2017, in addition a reduction in development levies also applies to areas/streets that are identified in this LAP for renewal and regeneration.

Recommendation:

No amendment proposed.

3.2.1.26 Submission No. KE-C8-218: MARY O'DONOGHUE C/O SKELLIG HOLIDAY HOMES

Submission Summary:

Requests that lands be rezoned from agriculture to tourism and related to facilitate a glamping park at Inchiclough, Cahersiveen. Submission states that the demand for tourist accommodation significantly surpasses the current supply.

It is stated that this rezoning would align with the strategic direction that has been set out for Cahersiveen through various developmental endeavours such as the South Kerry Greenway, Baile Seirbhishe Gaeltachta designation, and the forthcoming RRDF regeneration.

The submission states that the augmentation of designated tourist accommodation is a cornerstone for not only sustainable economic development but also for addressing the pressing housing needs in Cahersiveen, i.e. it would reduce of the competition between residential and tourist accommodation demands.

Response:

The site is located in the rural area, outside of Cahersiveen, it would be 2 kilometres southeast of the town. The lands are not serviced.

It is not the policy of the Council to zone lands for specific uses in the rural area, development in these areas is assessed against the policies contained in the Development Plan.

These lands are located outside of the development boundary of Cahersiveen and as such a proposal to re-zone lands outside the development boundary cannot be considered under the LAP.

However, it should be noted that the provisions of the KCDP 2022-2028 and specifically chapter 10 Tourism and outdoor recreation apply. Under section 10.3.5.1 Camping/Glamping, Campervans and Caravans it is stated that while the Council considers that camping sites should be located on appropriately zoned land within established/or adjacent to existing settlements, proportionate camping sites may be appropriate to 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. Objectives KCDP 10-31 and KCDP 10-32 of the KCDP 2022-2028 support this.

Recommendation:

No amendment proposed.

3.2.1.27 [Submission No. KE-C8-221: STEPHANIE MAHEY](#)**Submission Summary:**

The submission raises a number of issues under the themes of housing, tourism infrastructure and town boundaries.

Housing/Population

Submission states that the number of houses proposed at 101 is inadequate to meet the housing and community need, and that there is a need for wider spectrum of housing that is affordable and socially inclusive, which is vital for the viability of Cahersiveen.

Submission highlights that the population projections set out in the draft LAP, while in line with the National Planning Framework and the Regional Spatial and Economic Strategy, failed to predict the surge in migration the area has witnessed. Reference is made in the submission to the influx from people from Ukraine and other countries which has swelled the numbers beyond the LAP's projections, just in the last eighteen months.

Submission requests that population targets should be increased by at least 30% to accurately reflect new demographic landscape and the aspirations of migrants, returning diaspora and locals alike to settle, build, and purchase homes in this area.

Tourism Infrastructure

The submission requests that additional lands be zoned for tourism development. It is stated that improving the provision of tourism specific accommodation will not only foster sustainable economic growth but will mitigate the conflict for space between tourism and residential needs.

Town Boundaries

Request that the town boundary be expanded to correspond with Cahersiveen's urban area, which is stated stretches from Carhan Bridge to the Points Cross, in order to tap into the town's tourism potential and to meet the expectations of a regional hub and to facilitate the ability of people to live locally.

Response:

The content of the submission is noted. The population projection figures set out originally in the KCDP 2022-2028 have 'headroom' provision inbuilt. Consequently, more lands than considered necessary has been zoned for development to ensure adequate supply. Should lack of supply of zoned lands become an issue over the lifetime of the LAP, the Council can then consider zoning additional lands to facilitate the need.

The Council sets out the conditions through zonings and policies and objectives to facilitate tourism development in appropriate locations. It is noted that a number of sites have been zoned for C5 Tourism and related uses in the town. It should also be noted that tourist accommodation and other tourist related activities are open for consideration or permitted in principle on all the M1, M2, M4 and R Residential zoned lands as well as the C5 Tourism and related zoned lands. Therefore, ample provision has been made in the LAP for tourist related activities and accommodation facilities and should they be proposed.

Recommendation:

No amendment proposed.

3.2.2 Kenmare

3.2.2.1 [Submission No. KE-C8-3: KENMARE OLD RESIDENTS](#)

Submission Summary:

The submission outlines that there is a lack of affordable housing for local residents in the Kenmare area due to high prices. In relation to traffic safety, the footpath opposite the old Riverdale nightclub is in need of improvement. The footpath needs to be widened and extended by at least 500m to allow the residents to walk safely into the town centre. These critical road safety issues on the N71 need to be addressed immediately before a fatality. Kenmare Old has untapped potential for both tourists and locals, but it remains disconnected from essential amenities such as cycle lanes and footpaths. Consider these examples:

- The bay/woodlands walk at the start of the tourist road is a hidden gem that could greatly benefit from improved access.
- Mucksna Mountain boasts some of the best views of Kenmare; creating a trail there would enhance our tourism offerings.

- The famine section of the cemetery holds historical significance, and more signage and information at its entrance would enrich the experience for visitors.
- The Sheen Pool/weir is a popular spot for bathers and tourists. Connecting it to a cycle lane/footpath would make it more accessible and enjoyable.
- Establishing a cycle lane around the Roughty Ring Road would enhance safety for runners and cyclists and promote healthy recreational activities in the area.

To conclude the submission outlines how the escalating housing prices in Kenmare have made it increasingly unaffordable for local residents. We urge the local council and national government to consider taxation measures to address this issue. Furthermore, we believe that attracting IDA/multinational investment, possibly through establishing industrial parks, is crucial to raising average wages in the area, thereby enabling local residents to compete in the local property market.

Response:

The Local Authority welcomes the submission received and noted the various points raised. The Local Authority is very supportive of community initiatives and recognises the importance of improving pedestrian and cycling infrastructure in urban and rural parts of the County, to improve pedestrian safety but also to facilitate local development and tourism activities.

The KCDP 2022-2028 provides the following objective support for the improvement of urban design including footpaths lighting etc; *"KCDP 4-11 Facilitate and support initiatives to strengthen and improve the physical environment of the towns and villages with enhanced streetscapes, appropriate shopfront design and provision of improved street lighting, public footpaths, and street furniture"*.

Regarding housing, the LAP provides for sufficiently zoned lands within the town of Kenmare to provide for the projected population increases that may occur over the lifetime of the LAP. It is outside of the remit of this plan to address economic issues regarding the affordability of housing within the town of Kenmare.

Recommendation:

No amendment proposed.

3.2.2.2 Submission No. KE-C8-6: KENMARE COMMUNITY CARE CLG

Submission Summary:

It is requested that the Taobh Linn Facility be renamed on Page 100 of the Draft Plan from day care centre to social centre to better reflect the services that they offer.

Response:

The content of the submission is noted. It is considered appropriate to amend the text of the LAP in accordance with the submission. This will be done in the preparation of the final plan and it is not considered to be a material change.

Recommendation:

No material amendment proposed.

3.2.2.3 Submission No. KE-C8-11: BOB MARTIN**Submission Summary:**

The submission considers that the LAP does not focus on increasing actual quality of life, fulfilment, mental-health, social interaction, etc. for full time residents enough. the town needs a Town Community Centre to provide for events and community functions as the current community centre "the old schoolhouse" highlighted in the Plan is not in use for a community purpose.

Response:

The Council recognises that the proper provision of community and social infrastructure of a high standard, in the most appropriate locations is important for all ages and abilities in society and is an essential component of building sustainable and properly planned communities. It is an objective of the LAP, KENMD-4, to support local sports groups, community groups and other groups in the development of facilities, at appropriate locations, throughout the Plan area.

It is recommended to include a new objective; Support the development of a community centre at an appropriate location in the town.

Recommendation:

It is recommended to include a new objective in Section 3.2.2.6 (Community Facilities Objectives) as follows;
Support the development of a community centre at an appropriate location within the town of Kenmare.

3.2.2.4 Submission No. KE-C8-22: PAUL MURPHY & ANN HICKEY**Submission Summary:**

The submission outlines that as a tourist/retirement town Kenmare would benefit from further walking routes and in particular looped or circular walkways to add to Reenagross between Kenmare town and the Kenmare river, at the rear of the Park Hotel. In particular the development of the Peninsula Park fig. in the LAP should be linked back to the town via Market Lane.

Response:

It is a main tenet of the MD Plan to promote the development of walkways and cycleways throughout the town and wider MD area. It is the intention of Kerry County Council to work closely with landowners, community groups, local development companies and government departments to achieve this key objective. Considerable potential exists for the sustainable development of walk/cycleways throughout the

town, thereby connecting the town centre with the river and Reenagross park. Funding has been secured to provide looped walks on the Peninsula Park which would link up with existing walkways at Kenmare Pier, Reenagross and the town centre. These amenities are supported by objectives in the LAP, KENMD-KE-22 and KENMD-KE-23.

It is considered appropriate to include an additional objective seeking to improve pedestrian connectivity between the approved Peninsula lands looped walk and the town centre.

Recommendation:

It is recommended to include a new objective in Section 3.2.2.9 (Recreation & Amenities Objectives) as follows;

Seek to improve pedestrian connectivity between the Peninsula Lands looped walk and the town centre in a sustainable manner in consultation and engagement with the local community and stakeholders.

3.2.2.5 [Submission No. KE-C8-23:](#) PAT O'SHEA

Submission Summary:

The submission outlines how walking circuits within the town are unfinished. A map that accompanies the submission identifies walks. There is an absence of footpaths on some sections of these walks.

The submission states that the new path across from Centra has no slope to allow cyclists to get onto or off the path.

The submission requests the inclusion of the Inner Relief Road for Kenmare.

Response:

See response/recommendation in Section 3.2.2.4. in relation to walks in Kenmare.

The Inner Relief Road for Kenmare is included in Table 14.3 (Priority Roads Infrastructure Projects) of the KCDP 2022-2028. Objective KCDP 14-27 supports the provision of projects listed in this table.

Recommendation:

No amendment proposed.

3.2.2.6 [Submission No. KE-C8-28:](#) JAMES MCCARTHY

Submission Summary:

The submission requests that lands located in Kenmare off the N71 adjacent to Gortamullin Heights, be re-zoned from Tourism and Related to Residential.

Response:

The site is zoned C5 (tourism) in the Draft Plan. The zoning on this site is consistent with the zoning on the remainder of the field. Notwithstanding the contiguous nature of residential properties to this site it is considered that the proposed C5 zoning is appropriate. The zoning matrix (Appendix B) set out in the LAP outlines the mix of uses, which includes residential which is permitted and open to consideration within this zoning category.

It is recommended that no amendment should be made in the context of the submission received, the proposed C5 zoning is appropriate. The zoning matrix (Appendix B) set out in the LAP outlines the mix of uses, which includes residential that is permitted and open to consideration within this zoning category.

The submission from the OPR (see Section 3.1.1) states that “the Planning Authority is required to reduce the overall quantum of residential zoned lands in Kenmare, Killorglin and Waterville in order to ensure consistency with the Development Plan Core Strategy and the HST figures for these settlements”. A proposal to increase the amount of zoned land in Kenmare would therefore be contrary to Recommendation 1 as contained in the OPR submission. To zone additional lands for residential in Kenmare would contravene the Core Strategy as contained in the KCDP 2022-2028, and having regard to the submission from the OPR, it would not be in accordance with the proper planning and sustainable development of Kenmare to zone additional lands for residential development at this location.

Recommendation:

No amendment proposed.

3.2.2.7 [Submission No. KE-C8-29:](#) JOHN HURLEY**Submission Summary:**

The submission requests that lands located in Killowen, Kenmare, that are currently partially zoned for medium density housing be re-zoned in their entirety for residential development.

Response:

The majority of the lands identified in the submission are outside of the development boundary, with the remaining part inside the boundary zoned Strategic Reserve, White Land (O1). Sequential development is an overarching objective in sustainable planning, with this location not considered sequential in the development of Kenmare given that there are unzoned and undeveloped lands between this site and the town centre.

See response/recommendation in Section 3.2.2.6 to Submission KE-C8-38.

Recommendation:

No amendment proposed.

3.2.2.8 [Submission No. KE-C8-34:](#) **SEÁN JONES****Submission Summary:**

The submission requests that lands in Kilmurry, Kenmare, be re-zoned from Industrial to either Mixed-use or Industrial, Enterprise and Employment.

Response:

The lands are located over 300m outside the settlement boundary as proposed for Kenmare in the Draft LAP. They are therefore not included in the Draft LAP. There are no planning grounds to extend the development boundary to include such lands given the quantum of unzoned lands located between this site and the town. There are also adequate amounts of lands zoned for industrial/enterprise/employment in Kenmare as referenced in the submission from the OPR. The lands are not fully serviced, the site is not connected to Kenmare with a footpath. This site would not meet the criteria for designating employment zonings as set out in Section 9.6.1 of the KC DP 2022-2028

This site is an established enterprise area outside of Kenmare which does not preclude the continuation of this type of use at this location.

Recommendation:

No amendment proposed.

3.2.2.9 [Submission No. KE-C8-35:](#) **THE PENINSULA PARK GROUP****Submission Summary:**

The submission requests that Kerry County Council's right of way from the peninsula park to the Druids Circle be included as part of this plan to connect the peninsula park with the town of Kenmare.

Response:

See response/recommendation in Section 3.2.2.4 to Submission No. KE-C8-22.

Recommendation:

No amendment proposed.

3.2.2.10 [Submission No. KE-C8-44:](#) **JOE HALLISSEY****Submission Summary:**

The submission requests that lands at Gortamullen, Killarney Road, Kenmare, be rezoned from Mixed Use to Residential.

Response:

This site forms part of an established enterprise area with a number of existing businesses operating from the overall site. It is considered that residential development within an established enterprise/industrial estate would not be compatible with the surrounding land use. Also see response/recommendation in Section 3.2.2.6 to Submission No. KE-C8-38.

Recommendation:

No amendment proposed.

3.2.2.11 [Submission No. KE-C8-50](#): MICHAEL & ANNE MURPHY**Submission Summary:**

The submission requests that an objective should be included in the Plan to support disabled people having choice and control over their living arrangements in line with the National Housing Strategy for Disabled People 2022-2027.

Response:

The Council is supportive of the strong interagency and community framework that exists in the County, including the Local Community Development Committee and the Public Participation Network. It is influenced by the broad policy areas already developed in relation to Healthy Ireland, the Age Friendly, Disability and Minority Group Programmes as well as the National Health & Educational policies. There are a number of objectives and policies contained in the KCDP 2022-2028 and the LAP that 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.

Objective KCDP 7-11 seeks to 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.

Recommendation:

No amendment proposed.

3.2.2.12 [Submission No. KE-C8-52](#): LENA O'SULLIVAN**Submission Summary:**

This submission requests that lands (c. 2 ha) at Oaklands, Dromneavane, Kenmare are zoned for residential use in order to complete the existing estate/infill development.

Response:

The Local Authority has prioritised the zoning of lands for new residential development in a sequential manner on infill sites and sites contiguous with other established residential areas in so far as is practicable having regard to site constraints, including issues such as access and pedestrian facilities. From a sequential approach perspective, there are more suitable lands closer to established residential areas that should be developed first.

Also see response/recommendation in Section 3.2.2.6 to Submission No. KE-C8-28.

Recommendation:

No amendment proposed.

3.2.2.13 [Submission No. KE-C8-55:](#) MARY O'BRIEN

Submission Summary:

This submission requests that lands that are zoned as Strategic Reserve, White Land in the Draft LAP for Kenmare at Gortamullin, be zoned proposed residential.

Response:

The site is zoned O1 Strategic residential reserve in the Draft Plan. From a sequential approach perspective, there are more suitable lands located closer to established residential areas that should be developed first.

Also see response/recommendation in Section 3.2.2.6 to Submission No. KE-C8-28.

Recommendation:

No amendment proposed.

3.2.2.14 [Submission No. KE-C8-57:](#) MARK HORGAN & JESSICA DENNISON
[Submission No. KE-C8-80:](#) JACKIE HORGAN & MARY HORGAN

Submission Summary:

This submission requests that an area of ground that contains a farm shed in Gortamullen, Kenmare, which is zoned existing residential in the Draft Lap, be rezoned as Tourism and Related to be in keeping with the zoning of the adjoining land.

Response:

It is acknowledged that this site contains an existing farm building and is therefore not existing residential as shown in the zoning map contained in the Draft LAP for Kenmare. This site forms part of the surrounding lands that are zoned C5 Tourism & Related. It is therefore considered appropriate to change the zoning of these lands as requested.

Recommendation:

It is recommended to amend the Kenmare zoning map from R2 Existing Residential to C5 Tourism & Related, see Amendment 21 in Section 4.5.5.

3.2.2.15 Submission No. KE-C8-73: KENMARE BAY SAILING CLUB**Submission Summary:**

The submission seeks the development of facilities at Kenmare pier to enhance the area as a watersports destination, particularly sailing as given that the sailing clubs current location in Dauros, the future growth of the club is severely restricted. The submission includes a proposed location and layout of the sailing facilities, to the west of Kenmare Pier.

Response:

It is acknowledged that there is a need for enhanced recreational opportunities within Kenmare. Water sports are an important leisure and recreational activity it would be appropriate therefore to include an objective to support the development of sailing facilities at an appropriate location within the town of Kenmare.

Since the publication of the Draft LAP, Fáilte Ireland have published the West Cork and Kenmare Destination and Experience Development Plan. This plan builds on a number of existing destination development projects that will bring local experiences to life including improved facilities for walking, hiking and water activities. It is therefore considered appropriate to include reference to this plan by amending objective KENMD-28.

Recommendation:

It is recommended to include a new objective in Section 3.2.2.9 (Recreation & Amenities Objectives) as follows;

Support the development of Maritime and River related recreational facilities at an appropriate location or locations within the town of Kenmare.

It is recommended to amend Objective KENMD-28 as follows;

Facilitate where appropriate the development of projects listed in the 'Skellig Coast Visitor Experience Development Plan' and the 'West Cork and Kenmare Destination and Experience Development Plan'.

3.2.2.16 Submission No. KE-C8-75: DONAL MCCARTHY**Submission Summary:**

The submission relates to a site within Kenmare town which is currently zoned for Tourism & related. The submission seeks the rezoning of half of the site for residential purposes, to the north of Gortamullin Heights.

Response:

See response/recommendation in Section 3.2.2.6 to Submission No. KE-C8-28.

Recommendation:

No amendment proposed.

3.2.2.17 [Submission No. KE-C8-76](#): CLARE O'RIORDAN**Submission Summary:**

The submission requests the rezoning of a site from G1 Open Space to M2 Town Centre within Kenmare Town (to the north of Market Street).

Response:

The Council is supportive of the continuing growth of the town centre of Kenmare in terms of employment and the expansion of its town centre uses. The area proposed for rezoning is a modest infill site adjoining the existing town centre, and would represent a natural extension to the existing town centre. It is therefore considered appropriate to amend the zoning of a portion of these lands to M2. It is recommended that the remainder of the site remain G1 due to proximity to the river and potential flood risk.

Recommendation:

It is recommended to amend the Kenmare zoning map from G1 Open Space, Park to M2 Town Centre, see Amendment 23 in Section 4.5.7.

3.2.2.18 [Submission No. KE-C8-84](#): KENMARE COMMUNITY GARDEN**Submission Summary:**

The submission states support for the provision of allotments for the community in Kenmare, as well as improved walkability, as indicated on the zoning maps, linking facilities such as the community garden to the town.

Response:

The Council welcomes the supportive nature of the submission and will continue to support the provision of allotments and improved walking linkages in the town of Kenmare.

Recommendation:

No amendment proposed.

3.2.2.19 [Submission No. KE-C8-86](#): OLIVER HOLBEIN**Submission Summary:**

The submission states support for the Kenmare to Killarney Greenway, policies relating to town centre first and rural development, active travel, public transport and the proposed new car park in Kenmare.

Response:

It is a key objective of the LAP to strengthen and provide ongoing support for active travel public transport and the enhancing of facilities in the town of Kenmare. Policies in relation to greenways and the support of same are contained in both the LAP and the KCDP 2022-2028.

Recommendation:

No amendment proposed.

3.2.2.20 Submission No. KE-C8-88: DEMASTA LIMITED**Submission Summary:**

The submission requests that the Kenmare Settlement Boundary is extended to include the subject lands at Kenmare Old, Gortnadullagh, Sheen Falls Country Club and that they are zoned R1 New/proposed Residential.

It further requests that the following Connectivity Objective policy is included in the Kenmare MD Local Area Plan 2023-2029 - "Promote better connectivity between Kenmare Town Centre and Kenmare Old through the provision of pedestrian and cycling infrastructure and traffic calming measures."

Response:

It would not be in accordance with the principles of proper planning and sustainable development to zone lands proposed residential (R1) in the rural area outside of the settlement boundary of Kenmare. These lands are located outside the Kenmare development boundary, situated in a highly scenic landscape, with Kenmare Bay as its backdrop. The lands are designated as Visually Sensitive in the KCDP 2022-28.

While the County Plan is very supportive of proposals for sustainable tourism developments, it is considered inappropriate and unsustainable to extend the settlement boundary in excess of 1km to the south of the town and across the river.

The County has experienced extreme pressure for holiday homes, particularly in visually sensitive landscapes. It is the policy of KCDP 2022-2028 to ensure that holiday home type developments are located in established settlements, towns and villages, and not in the rural landscape. It would not be in accordance with the principles of proper planning and sustainable development to zone lands proposed residential (R1) in the rural area outside of the settlement boundary of Kenmare.

It is considered that Objective KENMD-KE-32 which seeks the provision of pedestrian and cycling infrastructure and calming measures would include Kenmare Old. An additional objective is therefore not necessary in this instance.

Recommendation:

No amendment proposed.

3.2.2.21 [Submission No. KE-C8-97: BERTIE & COLLETTE MCSWINEY](#)
[Submission No. KE-C8-105: KENMARE GOLF CLUB](#)

Submission Summary:

These submissions relate to the same area of ground, lands zoned R4 in Kenmare, and are not in favour of these lands being zoned for residential development.

The submissions raise concerns in relation to the risk from fluvial flooding and therefore should not be zoned or should be changed to water compatible development.

The Kenmare Golf Club submission also concerned of health and safety in relation to stray golf balls.

Response:

The site concerned is proposed to be zoned R4 strategic land reserve. The lands have been reserved for future long term residential development. A flood risk in relation to these lands has not been identified in the Strategic Flood Risk Assessment carried out in relation to the Draft LAP. It is outside of the remit of this plan to have regard to issues arising from the operational safety issues that could arise from the Kenmare Golf Club.

These lands are addressed as part of the response/recommendation to the OPR submission in Section 3.1.1. It is recommended in response to the OPR submission that the zoning of the site be amended to O1 Strategic Reserve.

Recommendation:

No amendment proposed.

3.2.2.22 [Submission No. KE-C8-104: ARTHUR O'SULLIVAN](#)

Submission Summary:

The submission seeks the dezoning of two parcels of land to the west of Kenmare town centre, to the north and south of the N70.

Response:

The northern part of the lands identified as part of this submission are proposed to be zoned C6 Mixed/General Commercial/ Industrial/ Enterprise uses. The RZLT scheme as it currently stands is only concerned with lands that are for residential purposes only, therefore under the current scheme arrangements land with the C6 zoning would not be liable for this tax.

These lands have been identified as lands appropriate for to be zoned C6 mixed/General Commercial/ Industrial/ Enterprise uses subject to planning assessment at planning application stage.

The southern part of the lands, and their zoning of R1 Proposed Residential, is addressed as part of the response to the OPR submission in Section 3.1.1. It is recommended in response to the OPR submission that the zoning of the southern part be amended to O1 Strategic Reserve, which is also currently not liable to be included on the RZLT Map.

Recommendation:

No amendment proposed in relation to C6 lands and see Amendment 17 in Section 4.5.1 in relation to R1 lands.

3.2.2.23 Submission No. KE-C8-114: KILLOWEN TL HOUSING LIMITED

Submission Summary:

The submission requests the rezoning of a 2.09ha site from "Strategic reserve, White land" & "Landscape Protection, Buffer Area" to "R1 New/proposed Residential". The site is located to the south of the Lodges development to the east of the town.

Response:

See response/recommendation in Section 3.2.2.6 to Submission No. KE-C8-28.

Recommendation:

No amendment proposed.

3.2.2.24 Submission No. KE-C8-119: PAUDIE MORIARTY & KATE DURRANT

Submission Summary:

The submitters object to the construction of the proposed carpark in Kenmare as it states that it is currently a flood plain as it would accelerate and increasing surface water run-off, alter the course of the river or remove any flood plain storage and would have a knock-on effect in other flood affected areas by increasing the flood damage to properties along the Finnihy River and the town square. The submission outlines that any carpark design on these lands should form part of the Kenmare Flood Relief Scheme which is currently being designed by the OPW thus eliminating the need for the lands to act as a flood plain without pushing the flood water somewhere else.

Response:

The Flood Risk Assessment undertaken as part of this plan has identified that such a use of a car park at this location would be an acceptable use. Further assessment will be undertaken at the planning application stage. Development on this site would be subject to a site specific flood risk assessment in accordance with Objective KENMD-52. Any such assessment is required to examine floodplain storage.

Recommendation:

No amendment proposed.

3.2.2.25 Submission No. KE-C8-120: KENMARE TIDY TOWNS**Submission Summary:**

The submission sets out points in relation to Kenmare Town. It welcomes the focus on town centre first and developments such as the Kenmare to Killarney Greenway. The submission raises a number of road safety issues such as: Entrance to Reenagross from Pier Road on N71 towards Beara; Lack of footpath walking to Bright Sparks Creche on N71 towards Sneem; Lack of footpath to Kilmurry Housing Estate; Narrow footpath on Railway Road, from Pobalscoil Inbhéar Scéine to Taobh Linn. The submission welcomes the provision of a car park at the convent lands. The following suggestions are included: Increased overall accessibility, safe access routes - developing the walkways indicated on the map, reducing dependence on cars. Improving the public realm on a street-by-street basis, adding landscaping including trees and pocket parks, increased pedestrianisation and safe dedicated outdoor dining spaces. Undergrounding of ESB wires on Shelbourne Street. Either partial or full pedestrianisation of Henry Street. Provision of bus shelters. Full pedestrianisation would work with 2-way traffic on Main Street. wooden bridge over the Finnihy River below Cromwell's Bridge be replaced with a sturdy metal one to connect Market Street with Turbid Road. Request an upgrade of the Public Toilet Facilities to a modern standard and which is inclusive of the needs of all. Request that a plan for the town park be drawn up. Request the provision of public toilets by the pier and dredging at the pier.

Response:

The support contained within the submission is noted and welcomed.

Support exists within the LAP to improve public connectivity walkability etc under the following objective, KENMD-KE-32, promote a more pedestrian and cycling friendly environment, to improve movement and access throughout the town, through the provision and improvement of pedestrian and cycling infrastructure and traffic calming measures, subject to environmental assessments.

Regarding the provision public toilets the following objective is contained within the Draft Plan, KENMD-KE-20, facilitate the provision of additional public toilets at an appropriate location.

Regarding the provision of improved public realm and urban design within the town centre there are the following objectives in the LAP support such improvements:

- | | |
|------------|--|
| KENMD-KE-1 | Sustainably plan for and facilitate the continued regeneration and renewal of the Town Centre's streets, public realm spaces, including squares, parks, nodes, walkways and greenways in order to revitalise it as a prosperous, vibrant, attractive location in which to live, work, learn and visit. |
| KENMD-KE-2 | Facilitate town centre works and implement public realm enhancement works at appropriate locations. |

Recommendation:

No amendment proposed.

3.2.2.26 [Submission No. KE-C8-122: VIRTUS PROJECT MANAGEMENT](#)**Submission Summary:**

The submission seeks the rezoning of land (1ha) to the south-west of Kenmare Town Centre from "tourism and related" to "residential" stating that it is sequentially preferable than other zoned land in the town.

Response:

The lands form part of a C5 zoning to the south of Kenmare Town Centre. There are R1 lands located to the south of this site. An amendment to the zoning of these lands, i.e. changing the C5 to R1 and the R1 to C5, would not contravene the recommendation of the OPR, see Section 3.1.1, as they are favourably located in terms of achieving compact growth and providing for a sequential approach to development. There would not be an impact on the housing supply target with such a change.

Given the location of these lands, which are located in a sequential manner in terms of residential development, an amendment to the zoning map would be in accordance with the proper planning and sustainable development of the area.

Recommendation:

It is recommended to amend the Kenmare zoning map from C5 Tourism & Related/R1 New/Proposed Residential to R1 New/Proposed Residential/C5 Tourism & Related, see Amendment 24 in Section 4.5.7.

3.2.2.27 [Submission No. KE-C8-130: KENMARE ROWING AND BOATING CLUB](#)**Submission Summary:**

The submission seeks the development of rowing club facilities and amenities to provide a permanent home for the club and to allow for development and expansion. The submission sets out proposed location and layout near Pier Road / Peninsula Lands.

Response:

See response/recommendation in Section 3.2.2.15 to Submission No. KE-C8-73.

Recommendation:

No amendment proposed.

3.2.2.28 [Submission No. KE-C8-145: ANTHONY O'CALLAGHAN](#)**Submission Summary:**

This submission requests that lands which were previously zoned residential but are not included in the Draft LAP for Kenmare at Kilmurry are included for residential development.

Response:

Planning permission has not been sought for the undeveloped area of land subject of this submission. The lands are not sequential in terms of the development of Kenmare and would not be in accordance with the overarching objective to achieve compact growth. These lands are not serviced, there is no footpath/public lighting connecting these lands to the town. The Planning Authority is unable to consider the zoning of lands that are not in accordance with the Tiered Approach to Zoning as it would contravene Objective KCDP 3-6 of the KCDP 2022-2028.

Also see response/recommendation in Section 3.2.2.6 to Submission No. KE-C8-28.

Recommendation:

No amendment proposed.

3.2.2.29 Submission No. KE-C8-165: KENMARE BUTTER MARKET LTD.**Submission Summary:**

This submission suggests that a master plan be prepared in relation to The Square in Kenmare with a focus on the potential for the arts. The submission also describes how in terms of Digital Innovation, Kenmare has been neglected compared to Cahersiveen and Killorglin, in particular remote working. A lack of an arts policy in the LAP is identified by the submission.

Response:

The Council recognises that the arts play a significant in the culture and heritage of our communities, the potential for the arts is endorsed by objectives in both this LAP with the support for greater community facilities under objective KENMD-KE-6, facilitate the sustainable development of community hub facilities at appropriate locations.

Similarly, within the KCDP 2022-2028 under Section 8.2 Arts and Culture there is explicit objective and policy support for the arts throughout the county as contained in Objectives KCDP 8-19, KCDP 8-20, KCDP 8-21, KCDP 8-22, and KCDP 8-23.

The need for digital connectivity and innovation within Kerry is recognised within the KCDP 2022-2028. Particularly under Volume 1, Chapter 14 Connectivity, Section 14.9 Digital Connectivity. Section 14.9 Digital Connectivity contains a series of objectives that support the various national programs e.g. National Broadband Plan, Kerry Digital Strategy 2021 and also makes reference to the Kenmare Innovation Hub.

Recommendation:

No amendment proposed.

3.2.2.30 [Submission No. KE-C8-172: JOHN DALY](#)**Submission Summary:**

This submission requests the inclusion of an amenity route from Market Street to the Peninsula lands which was included in previous plans for Kenmare. The plans for additional car parks are supported by the submission, but additional lands for car parking should be zoned at the Henry Street/Shelbourne Street junction. To conclude the submission describes a shortage of housing in Kenmare, along with the types of houses that are needed.

Response:

The council notes the support within the submission for the proposed areas for carparking within the town of Kenmare.

The lands subject of this submission are proposed to be zoned M2 Town/Village Centre, having regard to the zoning matrix the M2 zoning does permit in principle the development of carparking at this location. Therefore, while not explicitly being zoned for car parking purposes the proposed M2 zoning at this location would not preclude an application for a carparking development subject to a planning application being made and assessment being carried out at application stage.

Figure 3.31b: Indicative Design Brief – Reenagappal as contained in the Draft LAP shows an indicative layout for the opportunity site as per the zoning map for Kenmare. Pedestrian access and connectivity would be required to be facilitated in the development of this site. See also response/recommendation in Section 3.2.2.4 to Submission KE-C8-22 in relation to an amenity route from Market Street to the Peninsula Lands.

Recommendation:

No amendment proposed.

3.2.2.31 [Submission No. KE-C8-173: MARTIN ARTHUR](#)**Submission Summary:**

This submission responds to observations on the Draft LAP made by the Kenmare Peninsula Group and by Paul Murphy & Ann Hickey. The submission goes on to outline that property rights have been impacted by Kerry County Council. An issue with a vehicular access shown on a diagram in the LAP is also referred to.

Response:

Having regard to the content of the submission which refers to a number of legal matters, they would be outside of the remit of the LAP to address. However, the submission does refer to p99 of the LAP in specific reference to the indicative layout for the proposed opportunity site. As this is an indicative layout the drawing as shown is not a definitive layout but an aspirational one giving ideas for potential access points to develop these lands if they were to be developed. Any such development would be subject to the normal planning assessments as part of any planning application requiring landowner consent etc. See also response/recommendation in Section 3.2.2.4 to Submission No. KE-C8-22.

Recommendation:

No amendment proposed.

3.2.2.32 [Submission No. KE-C8-180: SENATOR MARK DALY](#)**Submission Summary:**

This submission supports the inclusion of a right of way towards Market Street from the Peninsula Park.

Response:

See response/recommendation in Section 3.2.2.4 to Submission No. KE-C8-22 in relation to an amenity route from Market Street to the Peninsula Lands.

Recommendation:

No amendment proposed.

3.2.2.33 [Submission No. KE-C8-183: ENDA CROWLEY](#)**Submission Summary:**

This submission requests that lands zoned O1 Strategic Reserve/White Land in the Draft LAP for Kenmare at Gortamullen off the N70 are rezoned as R1 Proposed Residential.

Response:

See response/recommendation in Section 3.2.2.6 to Submission No. KE-C8-28.

Recommendation:

No amendment proposed.

3.2.2.34 [Submission No. KE-C8-190: KENMARE HERITAGE](#)**Submission Summary:**

The submission relates to the proposed refurbished heritage centre in Kenmare. It is stated that the existing Heritage Centre is almost 30 years old and is overdue a total refresh to make the visitor experience more relevant to the modern Kenmare visitor. It is stated that the heritage centre will be housed in the footprint of the existing Heritage Centre and the story of Kenmare Lace, a rich tradition that is well known throughout Ireland and abroad will be at the heart of it.

The history of lace making in Kenmare is set out in the submission in addition to several attachments giving examples of lace design.

Response:

Kerry County Council acknowledges the support for the heritage centre in the submission. The importance of Heritage and the provision of facilities to promote heritage both locally for the community and as a tourist offering is a key objective of the LAP. As such an objective of support has been included within the LAP for the provision of such facilities, KENMD-KE-6, facilitate the sustainable development of community hub facilities at appropriate locations.

Recommendation:

No amendment proposed.

3.2.3 Killorglin**3.2.3.1 [Submission No. KE-C8-8:](#) MARTIN DEINUM****Submission Summary:**

Requests an extension of the existing cycle lane infrastructure to improve cyclability near Steelroe, Killorglin.

Response:

Objective KENMD-KG-31 states that it is an objective of the Council to promote a more pedestrian/cyclist friendly environment through the provision of traffic calming measures and improved pedestrian and cyclist infrastructure. There are also a number of objectives and associated policies in relation to cycling contained in Chapter 14 of the KCDP 2022-2028.

Despite being on the outskirts of Killorglin, the specific section of road referred to in this submission is located within the Castleisland-Corca Dhuibhne Municipal District.

Recommendation:

No amendment proposed.

3.2.3.2 [Submission No. KE-C8-36:](#) GLEN EVANS & GENE EVANS**Submission Summary:**

This submission is requesting that an area of land zoned residential in Dromavally is extended to include additional lands so as to allow both properties to be developed.

Response:

The submission from the OPR (see Section 3.1.1) states that “the Planning Authority is required to reduce the overall quantum of residential zoned lands in Kenmare, Killorglin and Waterville in order to ensure consistency with the Development Plan Core Strategy and the HST figures for these settlements”. A proposal to increase the amount of zoned land in Killorglin would therefore be contrary to Recommendation 1 as contained in the OPR submission. The lands subject of this submission are outside of the settlement boundary for Killorglin.

To zone additional lands for residential in Killorglin would contravene the Core Strategy as contained in the KCDP 2022-2028, and having regard to the submission from the OPR, it would not be in accordance with the proper planning and sustainable development of Killorglin to zone additional lands for residential development at this location.

Recommendation:

No amendment proposed.

3.2.3.3 [Submission No. KE-C8-67](#): GENE & CATHERINE EVANS

Submission Summary:

This submission seeks the zoning of additional lands as C5 (Tourism) or mixed use in Dromavally adjacent to the petrol station, to provide new tourist facilities in close proximity to the riverfront and town centre.

Response:

This submission is requesting that lands zoned C5 Tourism & Related are extended to include lands outside of the settlement boundary for Killorglin in the LAP.

The response to OPR Observation 2 (parts (ii) and (iii)) – Environmental Assessments, in Section 3.1.1 is of relevance to this submission.

The existing C5 zoned lands are partially within Flood Zone A & B, but the land subject of this submission is predominantly Flood Zone B with the area along the river Flood Zone A, the majority of the site is therefore within the flood zone. It is therefore not considered appropriate to include these lands due to their location within Flood Zone A/B.

Recommendation:

No amendment proposed.

3.2.3.4 [Submission No. KE-C8-74](#): DANIEL & SHEILA O’SULLIVAN

Submission Summary:

The submission seeks the zoning of a 4.27ha site for R1 (New/Proposed Residential) in the townland of Reen.

Response:

The submission from the OPR (see Section 3.1.1) states that “the Planning Authority is required to reduce the overall quantum of residential zoned lands in Kenmare, Killorglin and Waterville in order to ensure consistency with the Development Plan Core Strategy and the HST figures for these settlements”. A proposal to increase the amount of zoned land in Killorglin would therefore be contrary to Recommendation 1 as contained in the OPR submission.

In addition, the lands are located approx. 150m outside of the settlement boundary for Killorglin as defined in the LAP. The lands are not sequential in terms of the development of Killorglin. There is a significant quantum of unzoned lands between this site and the settlement boundary, in addition to zoned lands within the settlement boundary.

The lands are not serviced. There is a proliferation of septic tanks/wastewater treatment tanks in the general area as the sewer does not extend as far as the site. Allowing for cluster development on these lands served by individual wastewater treatment systems would add to this problem. The Planning Authority is unable to consider the zoning of lands that are not in accordance with the Tiered Approach to Zoning as it would contravene Objective KCDP 3-6 of the KCDP 2022-2028.

To zone additional lands for residential in Killorglin would contravene the Core Strategy as contained in the KCDP 2022-2028, and having regard to the submission from the OPR, it would not be in accordance with the proper planning and sustainable development of Killorglin to zone additional lands for residential development at this location.

Recommendation:

No amendment proposed.

3.2.3.5 Submission No. KE-C8-115: FEXCO

Submission Summary:

The submission seeks the rezoning of a site adjacent to FEXCO in Killorglin from Mixed Use to R1 New/Proposed Residential or alternatively as "Built Up Area".

Response:

The lands form part of a large M1 zoning to the northwest of Killorglin Town Centre. The M1 zoning is included in the Settlement Capacity Audit for Killorglin, the site therefore forms part of the housing supply target for Killorglin. The development of these lands would accord with the principles of compact growth based on their location in close proximity to the town centre. A change from M1 to R1 would also not increase the potential housing yield of the site.

Changing the zoning to proposed residential would increase the likelihood of development being realised on these lands as a residential zoning would mean these lands would be subject to the RZLT.

Given the location of these lands, which are located in a sequential manner in terms of residential development, it is considered that amending the zoning map as requested in the submission would be in accordance with the proper planning and sustainable development of the area.

Recommendation:

It is recommended to amend the Killorglin zoning map from M1 Mixed Use to R1 New/Proposed Residential, see Amendment 26 in Section 4.6.2.

3.2.3.6 Submission No. KE-C8-116: NUALA KEANE**Submission Summary:**

The submission seeks the zoning of land in Killorglin, Reen/Knocklyne, as R1 or strategic residential reserve, given its proximity to existing residential development.

Response:

There also would be a serious question regarding the road on which the site is accessed from, in close proximity to a bend, and its ability to accommodate the significant level of traffic that would result if this site was developed. There is also no footpath on the road.

The lands are not fully serviced. The Planning Authority is unable to consider the zoning of lands that are not in accordance with the Tiered Approach to Zoning as it would contravene Objective KCDP 3-6 of the KCDP 2022-2028.

See response in Section 3.1.1 to the submission from the Office of the Planning Regulator.

Recommendation:

No amendment proposed.

3.2.3.7 Submission No. KE-C8-117: PETER KEANE**Submission Summary:**

The submission seeks the zoning of a site in Dromavally, Killorglin for mixed use development (for example a neighbourhood shop and 10 housing units).

Response:

Development on this site was previously refused by An Bord Pleanála (Planning Reg. No. 11/4) due to traffic safety and impact on the town centre. Objective KCDP 4-42 as contained in the KCDP 2022-2028 states that it is the policy of the Council to promote the development of the town centre as the primary location for retail and as an attractive location for shopping, business, tourism, residential and community life. This proposal would therefore not be in accordance with the provisions of the County Development Plan in relation to the location of retail development.

In the LAP it is stated that "any retail development that takes place in Killorglin should take place in the town centre in order to encourage its regeneration and development as a vibrant town centre". To facilitate retail development outside of the town centre, such as this location, would therefore contravene the LAP.

The submission also references the provision of residential development on the site. The submission from the OPR (see Section 3.1.1) states that “the Planning Authority is required to reduce the overall quantum of residential zoned lands in Kenmare, Killorglin and Waterville in order to ensure consistency with the Development Plan Core Strategy and the HST figures for these settlements”. A proposal to increase the amount of zoned land in Killorglin would therefore be contrary to Recommendation 1 as contained in the OPR submission. The OPR regards these lands as being non-sequential and this is confirmed by the quantum of unzoned lands between Bansha and the town centre. The lands subject of this submission are therefore not considered to be sequential in terms of the development of Killorglin. To zone additional lands in Killorglin to facilitate residential development would contravene the Core Strategy as contained in the KCDP 2022-2028.

Having regard to the negative planning history of the site, retail policies contained in the KCDP 2022-2028 and the LAP, and the submission from the OPR, it would not be in accordance with the proper planning and sustainable development of Killorglin to zone lands for mixed use development at this location.

Recommendation:

No amendment proposed.

3.2.3.8 [Submission No. KE-C8-121: CHERRYHILL DEVELOPMENTS & OHR DEVELOPMENTS](#)

Submission Summary:

The submission seeks the zoning of an additional 5.14 acres of residential land at Bansha (across from Astellas). The submission outlines the planning history associated with the site along with specific planning policies to support the request.

Response:

In Section 3.1.1, the submission from the Office of the Planning Regulator, required the Planning Authority to omit certain R1 lands in Killorglin which included the lands zoned R1 in Bansha which this submission is seeking to extend the area of. The recommendation in response to the OPR submission is proposing to omit all residential lands in Bansha.

The submission from the OPR (see Section 3.1.1) states that “the Planning Authority is required to reduce the overall quantum of residential zoned lands in Kenmare, Killorglin and Waterville in order to ensure consistency with the Development Plan Core Strategy and the HST figures for these settlements”. A proposal to increase the amount of zoned land in Killorglin would therefore be contrary to Recommendation 1 as contained in the OPR submission. The OPR regards these lands as being non-sequential and this is confirmed by the quantum of unzoned lands between Bansha and the town centre. The lands subject of this submission are therefore not considered to be sequential in terms of the development of Killorglin.

To zone additional lands for residential in Killorglin would contravene the Core Strategy as contained in the KCDP 2022-2028, and having regard to the submission from the OPR, it would not be in accordance with the proper planning and sustainable development of Killorglin to zone additional lands for residential development at this location.

Recommendation:

No amendment proposed.

3.2.3.9 Submission No. KE-C8-158: KILLORGLIN TIDY TOWNS GROUP

Submission Summary:

This submission states that there are minimal facilities for young people in Killorglin and includes a proposal for an off road cycling facility at the Old Roadstone Aggregate Quarry outside of the town.

The submission proposes that the capacity of bins in Killorglin be increased with the use of Big Belly Bins.

The submission highlights an issue with silted up gullies in the town is identified by the submission.

The submission questions how air quality in the town will be monitored when there is no monitoring in the town.

The submission concludes by stating that the Bansha road sign on the Milltown side of the town is confusing as visitors expect a sign for Killorglin.

Response:

The proposal to develop a cycling facility in the area is supported in the LAP by Objective KENMD-KG-16, where it is an objective of the Council to encourage the sustainable improvement of existing recreational facilities and the development of new recreational facilities at appropriate locations which would focus on particular strengths of Killorglin & its surrounding environment, e.g. water activity, sailing, canoeing, sea angling/fishing etc & as a base for walking/cycling and other similar activities. This type of proposal would also be supported by objectives contained in the Tourism and Connectivity Chapters as contained in the KCDP 2022-2028.

The other issues raised in the submission, whilst relevant to the development of Killorglin, are outside of the remit and context of the Local Area Plan and can be dealt with a local level.

Recommendation:

No amendment proposed.

3.2.3.10 [Submission No. KE-C8-224: TIMOTHY O'NEILL](#)**Submission Summary:**

The submission refers to lands at Castleconway, Killorglin. The landowner wishes to have the R1 zoning on his lands as set out under the Draft Plan removed. It is suggested however that a portion of the land would be suitable for residential development as indicated on an accompanying map.

Response:

The lands are considered to be appropriately zoned for residential development given their proximity to the town centre and existing housing estate to the northwest, Knocklyne. To change the zoning would therefore not be in accordance with the proper planning and sustainable development of Killorglin.

Reference is made in the submission to these lands being omitted on appeal from the RZLT map. This decision is noted by the Planning Authority but the reason the Bord omitted the lands was based on the expiration of the previous LAP and not on the servicing status of the land. These lands are considered to be serviced.

To zone additional lands for residential in Killorglin as indicated would contravene the Core Strategy as contained in the KCDP 2022-2028, and having regard to the submission from the OPR (see Section 3.1.1), it would not be in accordance with the proper planning and sustainable development of Killorglin to zone additional lands for residential development at this location, nor would it be in accordance with the proper planning and sustainable development of Killorglin to dezone lands that are located sequential to the town centre.

The proposed new residential lands would require over 200m of an access from Sunhill Road, the road to the east of the site does not have a footpath. The Planning Authority is unable to consider the zoning of lands that are not in accordance with the Tiered Approach to Zoning as it would contravene Objective KCDP 3-6 of the KCDP 2022-2028.

Recommendation:

No amendment proposed.

3.2.3.11 [Submission No. KE-C8-227: FERGAL GRIFFIN \(SOLICITOR\)](#)**Submission Summary:**

Requests that lands at Sunhill be zoned in the draft LAP, submission states that this land was previously zoned. Submission highlights the lack of housing supply in Killorglin and sets out the advantages of the site – proximity to town, walking distance to schools and shops.

Response:

This submission relates to 3 plots of ground outside of the settlement boundary for Killorglin.

See response in Section 3.1.1 to the submission from the Office of the Planning Regulator.

In addition, the nearest plot of land is located approx. 350m, the other plots being further, outside of the settlement boundary for Killorglin as defined in the LAP. The lands are not sequential in terms of the development of Killorglin. There is a significant quantum of unzoned lands between this site and the settlement boundary, in addition to zoned lands within the settlement boundary.

The lands are not serviced, and to do so would require significant investment. The Planning Authority is unable to consider the zoning of lands that are not in accordance with the Tiered Approach to Zoning as it would contravene Objective KCDP 3-6 of the KCDP 2022-2028.

Recommendation:

No amendment proposed.

3.2.4 Sneem

3.2.4.1 [Submission No. KE-C8-7](#): ST. MICHAEL'S NATIONAL SCHOOL, SNEEM

Submission Summary:

Requests that land zoned education and community be given to St. Michaels National School by Kerry County Council to enable the extension of the school grounds.

Response:

This is a request to Kerry County Council for the ownership of lands to be transferred/allocated to the school. This request has been forwarded to the relevant section of Kerry County Council for their attention.

The lands referred to are zoned S3 Community Facilities which is considered appropriate to the established use.

Recommendation:

No amendment proposed.

3.2.4.2 [Submission No. KE-C8-40](#): QUILLS RETAIL LTD.

Submission Summary:

The submission raises issues as pertaining to the content of the Sneem Vision Plan 2030, in particular the urban design aspects of the document.

Response:

See response/recommendation in Section 3.2.4.5 to Submission KE-C8-85.

Recommendation:

No amendment proposed.

3.2.4.3 [Submission No. KE-C8-45](#): LANGLEY HUMPHREYS
[Submission No. KE-C8-49](#): DON KEOGH
[Submission No. KE-C8-151](#): TONY REID

Submission Summary:

These submissions describe an issue with the continuing and increasing releases of untreated sewerage directly into the Sneem River from the Sewerage Treatment Plant, and request that this problem is addressed. It is also requested that the existing system should not be loaded further until a satisfactory solution is reached.

Response:

Uisce Éireann Operations investigated this issue and confirmed there are no operational or malfunctional issues with the plant or the pump station at Sneem. It is important to note that the operation and management of the plant and network in Sneem is a matter for Uisce Éireann, while the authorisation and monitoring of the system is a matter for the EPA.

Recommendation:

No amendment proposed.

3.2.4.4 [Submission No. KE-C8-65](#): SNEEM TIDY TOWNS WORKING GROUP

Submission Summary:

The submission fully endorses the Sneem 2030 Vision Plan which complements the 5 year TidyTownns Plan (May 2023).

The submission highlights the following: place all the electric wiring underground; need a designated, covered bus stop to facilitate the users of the local bus link; more public seating/covered band stand type of seating (objectives 4 and 8); pedestrian crossing needed from Quay Road to Mace and one from Seaview to D.J. O'Sullivan's; Designated parking; reinstatement of the Sneem Market onto the side of the Fair Green; seeking to create a Community Orchard behind Seaview which could also function as a "living classroom" for the adjacent St. Michael's School, which is zoned as Community Facilities (S3), seeks it rezoning as G1 (Open space/Park) and leased to the community? Request Kerry County Council to support local communities in the removal of Invasive species (rhododendron ponticum); fully endorse Langley Humphreys' submission (reference KE-C8-45) regarding Sneem Sewerage Treatment Plant and Sneem River pollution.

Response:

This plan aims to support the protection and/or enhancement of local biodiversity features within both urban and rural areas and to stop the spread of invasive introduced species. The Kerry Biodiversity Action Plan (BAP) is contained in Volume 6 of the KCDP 2022-2028. It is an objective

of the BAP to work with a range of stakeholders to ensure protection and enhancement of biodiversity in the county and to increase awareness and appreciation of biodiversity within the wider community. Specifically objective 3.3 and 4.2 as listed below, and in line with National policies e.g. the Pollinator Plan, the biodiversity Officer will support community groups in implementing actions for the protection and restoration of Biodiversity and provide support in creating and delivering outreach and education initiatives that seek to encourage wider understanding within local communities of environmental concerns and actions implemented.

- 3.3 LA Supports initiatives/ actions from community that focus on biodiversity as a way to mitigate/adapt to climate change
- 4.2 Work with the community, 'biodiversity mentors' and other groups in the protection and enhancement of biodiversity including the provision of locally produced food
 - 4.2.2 Support community groups seeking to undertake biodiversity projects at appropriate locations and further to environmental assessment

Issues in relation to public realm improvements are responded to in Section 3.2.4.5, the response in relation to Sneem 2030 Vision Plan.

The submission is seeking the changing of an S3 Community Facilities Zoning to G1 Open Space/Park in order to create a community orchard. An orchard proposal would be supported by Kerry County Council and this proposed use would be compatible with the S3 zoning as it would be a community facility. It is therefore considered that the zoning of the site is appropriate for the proposed use. See also Section 3.2.4.1, response in relation to St. Michael's School.

See Section 3.2.4.3 response in relation to submissions on issues highlighted with Sneem River.

Recommendation:

No amendment proposed.

3.2.4.5 [Submission No. KE-C8-85: SNEEM DEVELOPMENT CO-OPERATIVE LTD.](#)

Submission Summary:

This comprehensive and detailed submission includes a "Sneem 2030 Vision Plan".

This submission welcomes the LAP for Sneem , and the submission is happy that the Council shares their views in relation to the natural beauty the setting of Sneem enjoys and the unique attraction of the village.

The Sneem 2030 Vision Plan includes a Public Realm Analysis for Sneem and a Universal Design – Walkability Audit was completed. The Audit recommended the following:

1. Improve footpaths so that they are universally accessible and inclusive and encourage sustainable walking;
2. Reallocate space from vehicular area to pedestrian, outdoor seating and greening;
3. Provide designated car and bus parking;

4. Improve junctions, narrowing crossing points with build-outs and flush crossing;
5. Declutter streetscape, providing attractive signage, street furniture, etc.

A Health & Safety Analysis is included which the submission considers is the most important aspect of the Sneem 2030 Vision Plan. The submission outlines how the existing 2 meter wide footpaths are compromised by cars overhanging the footpaths and by street furniture. There are also areas of no footpaths. Traffic incidents are listed along with issues being raised regarding parking, in particular buses and issues associated with this.

A Scheme Design is included in the submission. The suggested public realm improvements are indicated on a map within the Sneem 2030 Vision Plan, these include shared streets, safe schools zone, pedestrian bridge, pedestrian crossings, enhancements to the north and south squares, footpath widening, new footpaths, and transition zone treatments. A phasing plan is proposed along with costings in the submission.

Consultation that the Sneem Vision Plan 2030 went through within the community is also detailed in the submission.

Response:

Kerry County Council wishes to acknowledge the considerable work that was put into the preparation of The Sneem 2030 Vision Plan.

There are three objectives relating to Transport & Movement as contained in the LAP for Sneem:

- | | |
|-------------|---|
| KENMD-SM-8 | Carry out a Traffic Management Plan for the town to ascertain the optimum traffic management solutions to address the needs of residents, visitors and tour operators in Sneem. |
| KENMD-SM-9 | Promote a more pedestrian and cyclist friendly environment through the provision of traffic calming measures and improved pedestrian and cyclist infrastructure (including a footpath up to the GAA pitch), subject to environmental assessments. |
| KENMD-SM-10 | Support the development of dedicated tour bus parking in the town, at an appropriate location. |

The majority of the measures proposed in the Sneem 2030 Plan by the local community would therefore be supported by objectives contained in the LAP. If specific projects are progressed, there would therefore be support in the LAP for such projects.

In addition to the LAP, policies/objectives as contained in the KCDP 2022-2028 would also be supportive of such village improvements, e.g. Objective KCDP 4-11.

Kerry County Council will continue to engage with local stakeholders in support of the aims of the Sneem 2030 Vision Plan.

Recommendation:

No amendment proposed.

3.2.4.6 [Submission No. KE-C8-153: PETER VAN HENGSTUM](#)**Submission Summary:**

This submission indicates that their lands off Pier Road are currently zoned either landscape protected or are outside of the settlement boundary. The submission requests that the lands indicated are included within the Sneem settlement boundary and that a portion are zoned for housing.

Response:

This submission requests that their landholding be zoned a mixture of residential and for amenity. The area that is requested for residential zoning is approximately 2.4 hectares. Part of the area that is sought to be zoned residential is located outside of the settlement boundary as contained in the LAP with the area inside the boundary zoned G3 Landscape Protection in the Draft LAP.

The landholding adjoins the Kenmare River SAC. The G3 zoning as proposed is considered appropriate given the topography, setting and landcover of the area.

See Section 3.1.1 which is proposing to increase the zoning of residential land in Sneem. To zone additional land would exceed the Core Strategy as contained in the KCDP 2022-2028 and would therefore not be in accordance with the proper planning and sustainable development of the area.

Recommendation:

No amendment proposed.

3.2.4.7 [Submission No. KE-C8-155: DANIEL O'SHEA](#)**Submission Summary:**

This submission requests that a site in Sneem at Inchinaleega East is zoned New/Proposed Residential.

Response:

This submission is requesting that approx. 5.9 hectares of land is zoned in Sneem outside of the settlement boundary as defined in the LAP, with part of the site requested for residential and the remainder which adjoins the river on the eastern side of the site to be reserved to protect views of the river. Approximately 4.5 hectares are therefore being requested to be zoned residential.

It is of relevance that the site adjoins the river as on the Sneem Flood Maps, the NIFM flood extents are shown to cover a large part of the overall site.

As set out in Section 3.1.1, it is proposed to zone additional lands residential in Sneem in order to ensure that the housing target for Sneem as set out in the Core Strategy is met. Given the housing target as contained in the Core Strategy for Sneem and the sequential location of these lands adjacent to existing housing, it is considered that some of the lands in the submission can be zoned.

Recommendation:

It is recommended to amend the Sneem zoning map to extend the settlement boundary and zone as R1 New/Proposed Residential, see Amendment 28 in Section 4.7.2.

3.2.4.8 Submission No. KE-C8-223: DOLENT PROPERTIES LP

Submission Summary:

The submission refers to lands at Drimnabeg, Ard an Óir development.

The submission requests that the G3 Landscape protection zoning within the original extent of the housing development site be removed and that an R2 existing residential zoning be assigned instead. It is stated that these lands are considered part of the overall development and the designed housing estate. The submission states that the proposed zoning as landscape protection will prevent future development of the lands and may prevent the maintenance of underground services traversing the land along with any possible re-development by the present owner and future residents of the Ard an Óir development.

The submission highlights that the LAP sets out its vision for Sneem that new development would be accommodated within its development boundary and a positive reference to the completion of the Ard an Óir development which had remained unfinished for years. It is stated that the subject site is a gap site that can cater for the population growth proposed envisaged for Sneem as set out in the LAP.

Response:

The original planning application that resulted in the development of Ard an Óir, Planning Reg. No. 06/422, was permitted by Kerry County Council and granted on appeal by An Bord Pleanála. Condition 3 of the Bord's decision states, "the areas shown as public open space on the lodged plans shall be reserved for such use and shall be soiled, seeded, levelled and landscaped in accordance with a detailed scheme, including a timetable for implementation, to be agreed with the Planning Authority".

The Ard an Óir housing estate is zoned R2 Existing Residential. This zoning would facilitate the completion of the estate.

The area zoned as G3 in the Draft LAP would correspond to an open area shown on the northern part of the site of the application. It is stated on the drawings that, "this area to be retained in its natural state". This permitted use would differ from landscaped open space in a residential development. A G3 zoning would therefore correspond to the permitted use of this area of the overall site. Based on the fact that this G3 area is permitted open space, an application for residential development on these lands would contravene the grant of planning on the site.

In accordance with the Land Use Zoning Matrix as included in Appendix B of the Draft Kenmare LAP, public facilities and infrastructure, are open to consideration in G zonings. If in the event that infrastructure to serve the residential part of the development needs to transverse this zoning, the matrix allows for this to be facilitated.

Recommendation:

No amendment proposed.

3.2.5 Waterville

3.2.5.1 [Submission No. KE-C8-4:](#) PAUL KEATING

Submission Summary:

The submission requests that lands at Spunkán, Waterville, be reinstated as residentially zoned land, previously R4, and now be zoned R1 residential. The submission states that the site is immediately developable.

Response:

These lands are located on the periphery of the town and located to the rear of The Cloisters. The submission received from the OPR, Section 3.1.1, states the following “the Office raises concerns that the extent of zoning for residential use in Kenmare, Killorglin and Waterville does not comply with the Core Strategy of the Kerry County Development Plan 2022-2028”. A proposal to increase the amount of zoned land in Waterville would therefore be contrary to Recommendation 1 as contained in the OPR submission, and in response to the submission from the OPR it is proposed to omit these lands.

There is a significant quantum of undeveloped lands between this site and the centre of Waterville.

To zone additional lands for residential development in Waterville would contravene the Core Strategy as contained in the KCDP 2022-2028, and having regard to the submission from the OPR, it would not be in accordance with the proper planning and sustainable development of Waterville to zone additional lands for residential development at this location.

Recommendation:

See response in Section 3.1.1 to the submission from the Office of the Planning Regulator.

3.2.5.2 [Submission No. KE-C8-25:](#) WATERVILLE HOUSE & GOLF LINKS

Submission Summary:

The submission is opposed to any road improvement scheme that will include a free-standing walkway/cycleway bridge over the Currane River inside the grounds of Waterville House. The submission states that any proposed walkway and cycleway bridge will affect the environs and surroundings of the grounds of Waterville house which is an important tourist attraction for golf, fishing and general tourism. It states that any

proposed walkway/cycleway bridge will negatively impact the sensitive ecology of the grounds in and around the Currane river would be adversely and permanently disturbed as well as increase flood risk.

Response:

Kerry County Council are going through the statutory Roads Act process for this project. It is therefore considered that all issues will be dealt with in due course as part of the statutory process.

Recommendation:

No amendment proposed.

3.2.5.3 Submission No. KE-C8-37: STANLEY WALSH

Submission Summary:

The submission requests that land at Spunkane, Waterville, be rezoned from R4 Residential to R1 Residential.

Response:

The submission received from the OPR, Section 3.1.1, states the following "the Office raises concerns that the extent of zoning for residential use in Kenmare, Killorglin and Waterville does not comply with the Core Strategy of the Kerry County Development Plan 2022-2028". A proposal to increase the amount of zoned land in Waterville by zoning all lands subject of this submission R1 would therefore be contrary to Recommendation 1 as contained in the OPR submission.

Recommendation:

See response in Section 3.1.1 to the submission from the Office of the Planning Regulator.

3.2.6 Baile an Sceilg

3.2.6.1 Submission No. KE-C8-5: CHARLIE CURRAN

Submission Summary:

The submission requests that lands in Ballinskelligs be re-zoned from industrial to mixed-use zoning.

Response:

The Local Authority is conscious of the need to focus development within settlements in the LAP area including Baile an Sceilg, in order to support vibrant and strengthened communities, drivers of economic growth and to retain and provide the stimulus for population growth. The site is zoned industrial in order to reflect the existing land use. Given the planning history of the site and proposals to redevelop it, it is considered acceptable to amend this zoning to a mixed use (M1). This zoning allows for a more positive and flexible response to proposals for the re-use and re-development of underused and derelict sites.

Recommendation:

It is recommended to amend the Baile an Sceilg zoning map from C2.1 Industrial/Enterprise/Employment to M1 Mixed Use, see Amendment 30 in Section 4.9.1.

3.2.6.2 [Submission No. KE-C8-9:](#) KEITH CURRAN**Submission Summary:**

The submission requests that lands within be zoned for residential development. The submission requests the lands be zoned R4 until such time that the waste water infrastructure issues be rectified to allow for development.

Response:

These lands are located outside of the settlement boundary for the village. There are adequate lands zoned for residential development (R4) within the village that will facilitate the development of housing for Baile an Sceilg, in a central position, rather than extending the boundary out. Further to this, wastewater treatment capacity is also an issue for the zoning of lands in Baile an Sceilg.

Recommendation:

No amendment proposed.

3.2.6.3 [Submission No. KE-C8-98:](#) OS PROPERTIES LLC**Submission Summary:**

The submission seeks an extension of the settlement boundary to include all lands in their ownership and zoning of same for M1 Mixed Use General Development. The submission also seeks increase the capacity of the sewage treatment facilities within the landholding.

Response:

It is requested that that the lands subject of this submission be zoned M1.

The submission seeks to provide a bar and restaurant on the lands currently zoned as M1 (mixed use, general development), this proposed use is 'Open to Consideration' within this zoning as per the Land Use Zoning Matrix as contained in the LAP. A car park is proposed on the land currently zoned as M2 (village centre) which is 'Permitted in Principle' as per the Zoning Matrix. It is therefore not considered necessary to amend the land use zoning map to accommodate these uses.

It is proposed to incorporate a mix of accommodation services and a residential streetscape on the remainder of the land. In this instance there are insufficient services within the settlement for the provision of a multi unit scheme and therefore it is not appropriate to zone the land for M1. Furthermore, it is not appropriate to extend the development boundary for Baile an Sceilg given the small scale of the settlement, its settlement status and lack of waste water treatment capacity.

Recommendation:

No amendment proposed.

3.2.7 Beaufort

3.2.7.1	Submission No. KE-C8-14:	OONAGH MCCARTHY
	Submission No. KE-C8-15:	GEMMA ROBBINS
	Submission No. KE-C8-31:	PATRICIA GUERIN
	Submission No. KE-C8-32:	GER & EMILY HEALY
	Submission No. KE-C8-43:	ORLA HIGGINS
	Submission No. KE-C8-189:	SHEA TARRANT
	Submission No. KE-C8-212:	TIM & NIAMH CORCORAN

Submission Summary:

These submissions raise traffic safety concerns in relation to Beaufort. They request that traffic management systems be implemented in Beaufort, the issue of speeding is highlighted, and it is stated that a lack of infrastructure in the area could lead to an accident. The submissions ask the Council to address an urgent need for traffic/speed calming measures in Beaufort Village and states that there are no continuous footpaths to walk on in the village centre. It is also indicated that the road surface between Beaufort Bridge and Beaufort Bar is also in a poor state.

Response:

The contents of the submissions in relation to traffic management issues are noted. The 50kph speed limit in the village is in accordance with national guidance and that speed warning signs are provided on the approaches to the village. It is considered appropriated to amend the text within the LAP. Furthermore, the Draft Plan includes Objective KENMD-BT-4, facilitate and support the provision of pedestrian footpaths within the village, and it is proposed to amend this to include reference to traffic calming measures.

Recommendation:

It is recommended to amend Objective KENMD-BT-4 as follows;

Facilitate and support the provision of pedestrian footpaths within the village *and to implement traffic calming measures as appropriate.*

3.2.7.2 [Submission No. KE-C8-27:](#) CHRISTOPHER BREEN**Submission Summary:**

This submission requests that lands to the west of the village be included within the settlement boundary of Beaufort to enable it to be developed for residential purposes.

Response:

The settlement boundary for Beaufort has been extended in the Draft Plan from the boundary that was included in the Tralee/Killarney Hub Functional Area Local Area Plan 2013-2019.

There are significant areas of land zoned for development within the village R4 and M2, in addition there are strategic reserve lands (O1) identified. Sufficient lands have therefore been provided within the village to facilitate the sustainable development of Beaufort, subject to the provision of adequate wastewater treatment. There is also no wastewater treatment system in the village (see Section 3.1.13, submission from Uisce Éireann), the lands are therefore not considered to be serviced. In addition, a footpath does not extend to serve the site, which contributes to a lack of services in this area. A proposal to extend the settlement boundary is therefore not considered to be in accordance with the proper planning and sustainable development of Beaufort. The Planning Authority is also unable to consider the zoning of lands that are not in accordance with the Tiered Approach to Zoning as it would contravene Objective KCDP 3-6 of the KCDP 2022-2028.

Recommendation:

No amendment proposed.

3.2.8 Chapeltown**3.2.8.1 [Submission No. KE-C8-184: DEIRDRE O'SHEA](#)****Submission Summary:**

The submission welcomes the general objectives for Chapeltown, particularly KENMD-CP-4 and recommends that an integrated constructed wetland (ICW) is the only alternative for this.

Requests that the Council would seek to develop Chapeltown as a centre of excellence for supporting biodiversity and our natural heritage in general.

It is stated that the appropriate development of the community green space and the wastewater treatment facility in Chapeltown are an extraordinary opportunity for development in line with SDGs and can become a real asset to the island and should be incorporated into the County Climate Action Plan.

The following recommendations under SDGs are made:

SDG 14 Life Below Water and 15 Life On Land:

- The submission states that Valentia's natural heritage should be leveraged to encourage ecotourism on the island as a whole.
- the proposed park development should be designated as a haven for terrestrial and freshwater biodiversity where residents and tourists can interact deeply with nature
- that to support the riverwalk development a full assessment of the Caol River in its entirety, which is part of a catchment with Blue dot status, should be undertaken in conjunction with LAWPro, NPWS etc

- that the river assessment should be undertaken as a restoration project
- a river restoration project should be leveraged to encourage communities throughout Valentia Harbour/Portmagee Channel SAC and County Kerry to replicate it where necessary in the streams and smaller rivers that feed into our coastal waters

SDG 3 Good Health and Well-being:

- It is stated that by allowing the spaces to develop to their Good Ecological Potential (GEP) they can serve to future-proof the community thereby increasing community resilience by improving the health and well-being of the entire village and island

SDG 4 Quality Education and 11 Sustainable Communities:

- that a sustainably built natural heritage centre providing educational and economic opportunities be developed.

SDG 6 Clean Water and Sanitation, and SDG 8 Decent Work and Economic Growth:

- that an ICW would be a valuable natural asset providing both ecological services and making the village more attractive to tourists
- it is stated that the inclusion of a natural heritage centre of excellence to promote the Blue Dot catchment, the SAC and everything they contain would create science and ecotourism-based employment
- that community engagement and ownership should be the ultimate goal in developing the park.

Connectivity

The submission states that speeding is an issue in Chapeltown as the main thoroughfare on the island R565 bisects the village, - that traffic calming measures are needed on all roads within the village boundary to make it a safer and more enjoyable space to play, cycle, walk and spend time in.

Response:

As contained in the KCDP 2022-2028, it is an objective of the Council, KCDP 13-1, to 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, 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. The principle of ICWs in the county are therefore supported by this objective in the County Development Plan.

This plan aims to support the protection and/or enhancement of local biodiversity features within both urban and rural areas and to stop the spread of invasive introduced species. The Kerry Biodiversity Action Plan (BAP) is contained in Volume 6 of the KCDP 2022-2028. It is an objective of the BAP to work with a range of stakeholders to ensure protection and enhancement of biodiversity in the county and to increase awareness and appreciation of biodiversity within the wider community. Specifically objective 3.3 and 4.2 as listed below, and in line with National policies e.g. the Pollinator Plan, the biodiversity Officer will support community groups in implementing actions for the protection and restoration of Biodiversity and provide support in creating and delivering outreach and education initiatives that seek to encourage wider understanding within local communities of environmental concerns and actions implemented.

- 3.3 LA Supports initiatives/ actions from community that focus on biodiversity as a way to mitigate/adapt to climate change

- 4.2 Work with the community, 'biodiversity mentors' and other groups in the protection and enhancement of biodiversity including the provision of locally produced food
 - 4.2.2 Support community groups seeking to undertake biodiversity projects at appropriate locations and further to environmental assessment

The LAP is a land use plan and areas have been identified for both open space and community facilities in Chapeltown. The LAP would therefore support proposals in relation to the development of same, which would have to be developed in an appropriate manner and also would be subject of the necessary environmental appraisals that would be required for such developments.

The Draft Plan contains a section on Connectivity, 3.4.3.8, which states the following: "Due to its location on the R565 midway between Portmagee and Knightstown there is a considerable amount of through traffic during the summer months. There is no car park attached to the church and limited parking at the community centre. It is an objective of this plan to provide a car park in the village. Tourist traffic during the summer months creates a busy atmosphere but during the winter months traffic is mainly local." There is also an objective in relation to the provision of car parking, KENMD-CP-3, provide for additional car parking within the village at an appropriate location. Chapeltown is subject of a 50kph speed limit in accordance with national guidance. Objective KCDP 4-15 as contained in the KCDP 2022-2028 promotes a pedestrian friendly environment through the provision of traffic calming measures and improved pedestrian infrastructure in the Urban Area. See also response/recommendations in Sections 3.1.8 and 3.1.9.

Recommendation:

No amendment proposed.

3.2.9 Glenbeigh

3.2.9.1 [Submission No. KE-C8-51](#): PATRICK GRIFFIN

Submission Summary:

This submission requests that a 1.8 acre site in Kilnabrack Upper, Glenbeigh, on the N70 is zoned as R1 (New Residential).

Response:

The site is located outside of the development boundary for Glenbeigh within the Draft Plan.

The zoning map shows that the site is adjoining the River Behy, and the indicative NIFM Flood Extents cover the site. This site would therefore have flood risk concerns.

Wastewater treatment is an issue in Glenbeigh with no capacity available for additional development. Adequate lands have been zoned R4 within the village, in a sequential manner, to cater for residential development subject to the wastewater treatment issue being addressed.

The site is located on the N70 and a footpath extension would be required to serve the site. The Planning Authority is unable to consider the zoning of lands that are not in accordance with the Tiered Approach to Zoning as it would contravene Objective KCDP 3-6 of the KCDP 2022-2028.

Given the stated reasons it is not considered that a proposal to extend the development boundary and zone the site for residential is in accordance with the proper planning and sustainable development of Glenbeigh.

Recommendation:

No amendment proposed.

3.2.9.2 [Submission No. KE-C8-59: SEAN O'REILLY](#)

Submission Summary:

This submission requests that a glamping facility is considered for a site in Glenbeigh in the townland of Faha on the R564 road to Rossbeigh.

Response:

The site is located on the road to Rossbeigh, approx. 400m from the River Behy bridge. The site is therefore removed from the village of Glenbeigh and therefore it would not be appropriate to zone the site for tourism uses.

However, it should be noted that the provisions of the KCDP 2022-2028 and specifically Chapter 10 Tourism and outdoor recreation apply. Under section 10.3.5.1 Camping/Glamping, Campervans and Caravans it is stated that while the Council considers that camping sites should be located on appropriately zoned land within established/or adjacent to existing settlements, proportionate camping sites may be appropriate to 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. Objectives KCDP 10-31 and KCDP 10-32 of the KCDP 2022-2028 support this.

Recommendation:

No amendment proposed.

3.2.9.3 [Submission No. KE-C8-225: JOHN P. GRIFFIN](#)

Submission Summary:

The submission refers to lands at Keelnabrack Lower, Glenbeigh. The landowner requests that a substantial portion of his lands be zoned for C5 'Tourism and related' and a section be zoned for R4 'Strategic Residential Reserve'. The submission states the lands can be accessed from inside the development boundaries of the village and sets out the advantages of zoning the land. The submission states that the entrance strip to the subject site is currently proposed as R4 Strategic Reserve and that this is an error and should be corrected as this strip of land is too narrow to take any construction apart from a road.

The submission states that Glenbeigh has the potential to become an international tourism destination but at present it lacks the facilities to do so. The submission states that visitors are relying on caravan parks for holidaying and the lack of a broad range of tourism accommodation is hampering its potential.

Response:

The site is located outside of the development boundary for Glenbeigh. It is considered that it would not be appropriate to zone a site of over 12 hectares for development given that they are located on the periphery of the village. Sufficient services to cater for the development of this amount of additional zoned land in Glenbeigh are not available, see Section 3.1.13 Uisce Éireann submission.

It is the policy of the Council to support tourism development at an appropriate scale and location in accordance with Chapter 10 Tourism & Outdoor Recreation as contained in the KCDP 2022-2028.

In relation to the proposal to zone lands R4, a significant area of lands have already been zoned R4 in Glenbeigh, and to zone additional lands on the periphery, and in a non sequential manner, would not be in accordance with the proper planning and sustainable development of Glenbeigh.

Recommendation:

No amendment proposed.

3.2.10 Kilgarvan

3.2.10.1 [Submission No. KE-C8-21](#): TIM O'REILLY

Submission Summary:

The submission requests that land located in Kilgarvan village at Gortnaboul, be zoned proposed residential (R1).

Response:

Significant lands have been zoned within the village for residential development, in addition there are strategic reserve lands (O1) that have been identified to serve the future needs of Kilgarvan within the development boundary. The subject lands are located to the west of Kilgarvan and do not adjoin the development boundary. They are approx. 200m west of the settlement boundary. The gradient of the lands is also challenging. In terms of services, there is no footpath connectivity and Kilgarvan is subject to water supply issues, see Section 3.1.13 Uisce Éireann submission. The Planning Authority is unable to consider the zoning of lands that are not in accordance with the Tiered Approach to Zoning as it would contravene Objective KCDP 3-6 of the KCDP 2022-2028.

Given the stated reasons it is not deemed appropriate to zone the subject lands for residential use nor include them within the development boundary.

Recommendation:

No amendment proposed.

3.2.10.2 [Submission No. KE-C8-39](#): KEVIN O'REILLY**Submission Summary:**

The submission requests that lands in the village of Kilgarvan, be zoned strategic residential reserve (R4).

Response:

As proposed in the Draft LAP, the part of the lands that adjoin the R569 on the northern part of the site are zoned M2 Village Centre which is considered appropriate at this location, and would be a natural extension of the streetscape in Kilgarvan. It is envisaged that this zoning would accommodate residential development.

The remainder of the lands, an area of approximately 2 hectares, are zoned as strategic reserve (O1). It is considered that sufficient lands have been zoned within the village for residential development and given the water supply issues identified by Uisce Éireann in their submission, see Section 3.1.13, zoning additional lands R4 at this time is not considered to be in accordance with the proper planning and sustainable development of Kilgarvan.

Recommendation:

No amendment proposed.

3.2.10.3 [Submission No. KE-C8-66](#): JOHN MALONE**Submission Summary:**

The submission requests the rezoning of a site in Kilgarvan to the south the school from strategic reserve white lands (O1) and strategic residential reserve (R4) to new/proposed residential (R1).

Response:

Lands have not been zoned R1 Proposed Residential in settlements where there are wastewater/water supply capacity issues. It is therefore not considered appropriate to zone these lands R1.

However, it is considered appropriate that the lands zoned O1 at this location, in close proximity to the school and other services, can be zoned R4 as an appropriate extension of the existing R4 lands.

Recommendation:

It is recommended to amend the Kilgarvan zoning map from O1 Strategic Reserve, White Land to R4 Strategic Residential Reserve, see Amendment 34 in Section 4.12.1.

3.2.10.4 Submission No. KE-C8-175: NEIL O'SULLIVAN**Submission Summary:**

This submission requests that lands in Kilgarvan are zoned for low density housing off the R569.

Response:

Significant lands have been zoned within the village for residential development, in addition there are strategic reserve lands (O1) that have been identified to serve the needs of Kilgarvan within the development boundary. The subject lands are located to the west of Kilgarvan and are in a peripheral location. Kilgarvan is also subject to water supply issues, see Section 3.1.13 Uisce Éireann submission. Given the stated reasons it is not deemed appropriate to zone the subject lands for residential use nor include them within the development boundary.

Recommendation:

No amendment proposed.

3.2.10.5 Submission No. KE-C8-228: MICHAEL HEALY-RAE**Submission Summary:**

Submission relates to land at Sandymount, Kilgarvan. It is requested that the lands which are described as fully serviced, connected via a footpath and within walking distance to local services and amenities be zoned for residential development. It is stated that Kilgarvan has little serviced land available for residential development.

Response:

Significant lands have been zoned within the village for residential development, in addition there are strategic reserve lands (O1) that have been identified to serve the future needs of Kilgarvan within the development boundary. The subject lands are located to the west of Kilgarvan and do not adjoin the development boundary. They are approx. 200m west of the settlement boundary. There is no footpath connectivity and Kilgarvan is subject to water supply issues, see Section 3.1.13 Uisce Éireann submission. The Planning Authority is unable to consider the zoning of lands that are not in accordance with the Tiered Approach to Zoning as it would contravene Objective KCDP 3-6 of the KCDP 2022-2028.

Given the stated reasons, it is not deemed appropriate to zone the subject lands for residential use nor include them within the development boundary.

Recommendation:

No amendment proposed.

3.2.11 Knightstown

- 3.2.11.1 [Submission No. KE-C8-41](#): KNIGHTSTOWN TIDY TOWNS (Michael F. Egan)
[Submission No. KE-C8-72](#): KNIGHTSTOWN TIDY TOWNS (Michael F. Egan)
[Submission No. KE-C8-87](#): KNIGHTSTOWN TIDY TOWNS (Michael F. Egan)

Submission Summary:

This submission is requesting greater recognition of the Altazimuth Stone in Knightstown and to give it the prominence it deserves based on its associated history. The submission sets out an overview of its history and what has been achieved to date.

The submission seeks the extension of the settlement boundary of Knightstown and Chapeltown to allow for affordable housing so that young people can move back to the area.

The submission also states support for the UNESCO project but raises concern about the inclusion of Reencaheragh into the buffer zone.

The submission requests the preservation of a public right of way in Knightstown. It states that it is a pedestrian passage running from Market Street providing a shortcut to the seafront between Reenellen Apartments and the Old Lifeboat Station.

Response:

Given the historical importance of the Altazimuth Stone, it is considered appropriate to include additional text in the LAP in relation to same.

In relation to the UNESCO project, see response/recommendation in Sections 3.1.11 and 3.3.1.1.

In relation to extending the settlement boundary of both Knightstown and Chapeltown, there are water services issues within these settlements, and it therefore is not possible to zone lands for R1 (new/proposed residential development) at present, see submission from Uisce Éireann in Section 3.1.13. Sufficient lands have been zoned within the settlements as R4 (Strategic Residential Reserve) to serve future residential needs within the development boundary.

A list of Public Rights of Ways is set out in Volume 3 of the KCDP 2022-2028. Any amendments to Public Rights of Way are dealt with through the County Development Plan review process.

Recommendation:

It is recommended to include the following additional text in Section 3.4.7.1 as follows;

Within Knightsown is the Altazimuth Stone, which played a significant role in the development of sea navigation techniques with the determination of longitude.

3.2.11.2 [Submission No. KE-C8-42: RICHARD FORAN](#)**Submission Summary:**

The submission requests the extension of the boundaries of Knightstown and Chapelstown in line with government policies. There is a lack of affordable housing on Valentia as over 46% are registered holiday homes.

Response:

In relation to extending the settlement boundary of both Knightstown and Chapelstown, there are water services issues within these settlements, and it therefore is not possible to zone lands for R1 (new/proposed residential development) at present, see submission from Uisce Éireann, Section 3.1.13. Sufficient lands have been zoned within the settlements as R4 (Strategic Residential Reserve) to serve future residential needs within the development boundary.

Recommendation:

No amendment proposed.

3.2.11.3 [Submission No. KE-C8-58: BRENDAN GALLAGHER](#)**Submission Summary:**

This submission requests the zoning of 16 acres of land in Knightstown as S5 mixed/general community services/facilities and R1 Proposed Residential.

Response:

These lands are outside of the settlement boundary of Knightstown. It is the policy of the Local Authority to ensure the provision of services and facilities required for the economic, social and community development of the County. Given the proximity of part of the site to the hospital it is considered appropriate to zone some of this site for S5 mixed/general community services/facilities.

In relation to the request to zone lands residential and to extending the settlement boundary of Knightstown, there are water services issues, and it therefore is not possible to zone lands for R1 (new/proposed residential development) at present, see submission from Uisce Éireann, Section 3.1.13. Sufficient lands have been zoned within the settlement as R4 (Strategic Residential Reserve) to serve future residential needs within the development boundary. The road from which this road is accessed from on its southern side is substandard in terms of its width and does not have a footpath or public lighting. The Planning Authority is unable to consider the zoning of lands that are not in accordance with the Tiered Approach to Zoning as it would contravene Objective KCDP 3-6 of the KCDP 2022-2028. These lands are also located on the periphery of the village and would not be sequential in terms of the development of Knightstown, to zone them residential would therefore not be in accordance with the proper planning and sustainable development of the village.

Recommendation:

It is recommended to amend the Knightstown zoning map to extend the zoning map and zone S5 Mixed/General Community Services/Facilities, see Amendment 36 in Section 4.13.2.

3.2.11.4 Submission No. KE-C8-78: DERMOT J. WALSH**Submission Summary:**

The submission sets out that marina improvements are required in Knightstown.

Response:

The LAP contains the following objective in Section 2.11, KENMD-63, facilitate the maintenance and where appropriate the upgrade of port, harbour & pier infrastructure in the LAP area – subject to environmental assessment. Furthermore Section 3.4.7.6.1 Marine Activity of the Draft Plan contains the following text: “The Local Authority recognises that the maritime sector is a growing sector and selling point for the region. Kerry County Council is committed to supporting and facilitating the development of a vibrant and successful marine leisure and tourism sector. The development and completion of Valentia Harbour Marina and associated facilities is supported in this plan.” Any improvements to the Marina are therefore supported by the LAP.

Recommendation:

No amendment proposed.

3.2.11.5 Submission No. KE-C8-111: SEANIE MURPHY & MICK O'CONNELL**Submission Summary:**

This submission relates to lands in Farranreagh, Valentia and it is requested that the previous zoning outlined in a former Local Area Plan is reinstated (low density residential use). The submission outlines several reasonings for the inclusion of the lands and sets out submissions previously made at consultation stage.

Response:

In relation to the request to zone lands residential and to extending the settlement boundary of Knightstown, there are water services issues identified in relation to the settlement and it is therefore not possible to zone lands for R1 (new/proposed residential development) at present, see submission from Uisce Éireann, Section 3.1.13. Sufficient lands have been zoned within the settlement as R4 (Strategic Residential Reserve) to serve future residential needs within the development boundary. These lands are also located on the periphery of the village and would not be sequential in terms of the development of Knightstown, to zone them residential would therefore not be in accordance with the proper planning and sustainable development of the village. More suitable lands within the village boundary have been zoned as R4 (strategic residential reserve), to ensure that the longer-term residential needs of the village can be met. Additional residential zoned lands are not considered necessary or sustainable at this location.

Of the two areas of land identified in the submission, the western part does not have access to a footpath, and the track that accesses the eastern part is no more than 5m in width. The Planning Authority is unable to consider the zoning of lands that are not in accordance with the Tiered Approach to Zoning as it would contravene Objective KCDP 3-6 of the KCDP 2022-2028.

These lands are in a highly scenic coastal landscape, where a high level of rural one-off dwellings already exists. Dwelling houses for the sons and daughters of the landowners or the favourite niece or nephew can be considered in accordance with the rural settlement policies as contained in the KCDP 2022-2028.

Recommendation:

No amendment proposed.

3.2.11.6 Submission No. KE-C8-124: BRIAN CAHILL

Submission Summary:

The submission seeks more information in relation to any additional requirements / restrictions for being within an ACA? The property in question is a protected structure in Knightstown.

Response:

Chapter 8, specifically Section 8.4.3 Architectural Conservation Areas (ACA), of the KCDP 2022-2028 sets out the policies and objectives in relation to these areas. It is the policy of the Council to seek the protection and conservation of protected structures and their settings and designated architectural conservation areas. An ACA gives merit and protection to a group of buildings or structures. There would be no additional restrictions on the property in question given that it is already a Protected Structure. The Kerry County Council Conservation Officer can be engaged with in relation to development proposals for protected structures.

Recommendation:

No amendment proposed.

3.2.11.7 Submission No. KE-C8-134: PAUDIE LYNCH & SEAMUS LYNCH

Submission Summary:

The submission seeks the rezoning of Dungail house (Folio No. KY540085F, 0.28 Hectares) at the promenade at Knightstown, Valentia and the adjacent site (Folio No. KY74451F, 0.17 Hectares) as Mixed Use (M1).

The submission also expresses concerns about and opposition to the contents of the Draft Kenmare Municipal Area Plan regarding the proposed designation of Heritage and Culturally Sensitive Areas in Portmagee and Valentia Island. The practical impact of the proposals contained in the draft LAP on the residents of the area, and future generations is questioned. There is an unacceptable and disappointing level of uncertainty

and a lack of transparency as to how this will impact the local community in practical terms. The submission requests the removal of the H&CSA designations from the draft LAP.

The submission states that the village boundaries are too restrictive in Valentia and requests that they are expanded to accommodate the housing needs of both present and future Islanders. It furthermore states that Chapeltown is in urgent need of a public sewage treatment plant.

Response:

The subject site is currently zoned as M4 Built Up Area. Based on the Land Use Zoning Matrix as contained in Appendix B of the Draft LAP, this zoning is flexible with a wide variety of uses open to consideration. It is therefore considered that an M4 zoning on this site is appropriate. The lands adjoin the First Message Building site and associated visual corridor as set out in the Draft Lap in Figure 3.95. Development is not precluded on the M4 lands but are required to demonstrate that they integrate and respect the built heritage of the area.

In relation to the Heritage and Culturally Sensitive Areas related to the UNESCO project, see responses/recommendation in Sections 3.1.11 and 3.3.1.3.

In relation to the expansion of the village boundaries, see response/recommendation in Section 3.2.11.1.

Recommendation:

No amendment proposed.

3.2.11.8 [Submission No. KE-C8-142](#): VALENTIA TRANSATLANTIC CABLE FOUNDATION

Submission Summary:

The submission requests the following:

1. The provision of adequate statutory protections for the ensemble of relevant sites including the Cable Station complex and Slate Yard at Knightstown with a view to preserving the natural boundaries of these sites, including their integrity, authenticity and sustainability, while at the same time not inhibiting the development of the island's infrastructure, including affordable and sustainable homes, commercial outlets and other community building needs.
2. Infrastructure improvements, including road improvements, parking, cycling lanes, water and waste treatment, broadband infrastructure etc
3. To enable the start up and scaling up of new businesses which will emerge from the Digital Hub at the Cable Station and by providing industrial development space at Chapeltown
4. To increase the number of affordable homes to accommodate exiting needs in the community as well as the new arrivals.
5. To enable the revival of Knightstown as a vibrant village with multiple restaurants, bars and shops.
6. To increase in the number of beds, beyond the availability air bnb and self-catering accommodation, by expanding the Royal Hotel capacity and other sources.

Response:

See response in Section 3.1.11 to the submission from the Dept. of Housing, Local Government and Heritage.

In relation to the cable station and slate yard in Knightstown the LAP contains the following: "A section of the Main Street which is attractive in form and character has been designated an ACA. The structure, known as the 'First Message Building' in Knightstown has now been included on the RPS in accordance with Sections 54 and 55 of the PDA 2000, as amended. The structure comprises a single storey structure located within the Valentia Slate Yard site (the Slate Works industrial complex is protected in the KCDP 2022-2028, RPS Ref KY 079-026). This recommendation arises from the structure's special historical and social interest in recognition of its role in the Trans-Atlantic Cable project (Appendix D of this LAP provides additional details). Also see Section 2.5.2.1 and Section 2.5.2.3 for further details. A proposed extension to the ACA in Knightstown is also included as part of this plan. This is to be known as the Trans-Atlantic Cable ACA and it includes the three main sites associated with the history of the Trans-Atlantic Cable, on Valentia Island: The Cable Station, the "First-Message" building and the structure at Foilhommerum".

See Chapter 14 Connectivity and Chapter 13 Water and Waste Management of the KCDP 2022-2028 in relation to active travel, roads improvements, wastewater services and digital connectivity.

Also see response/recommendation in Section 3.2.11.1.

Recommendation:

No amendment proposed.

3.2.11.9 [Submission No. KE-C8-143: RNLI](#)**Submission Summary:**

This submission requests that provision for a new mooring for the RNLI Lifeboat at Knightstown Marina is taken into consideration.

Response:

See response/recommendation in Section 3.2.11.4 to Submission No. KE-C8-78.

Recommendation:

No amendment proposed.

3.2.11.10 [Submission No. KE-C8-150: BRENDAN CURTIN](#)**Submission Summary:**

The submission requests that any upgrade to Renard Pier should support all users of the pier. In relation to Knightstown the submission would support the development of a marina for Knightstown similar to that developed in Fenit, the submission states that there is no marina in

Knightstown. The submission would like to see a tourism objective in the Plan to re-establish a tourist office in the Knightstown and promotion of Valentia, as a tourist destination.

Response:

See response/recommendation in Section 3.2.11.4 to Submission No. KE-C8-78.

Section 3.4.7.6 of the LAP relates to Tourism & Outdoor Recreation in Knightstown. Furthermore Chapter 10, specifically Section 10.3.4.3 Tourism Developments and Tourist Facilities, as contained in the KCDP 2022-2028 states “in order to encourage longer stays in the County and to facilitate the achievement of a greater yield per visitor, it is important to maximise the integration of tourism products. This is essential to ensure that visitors can easily access services, attractions and amenities in the County from their accommodation base. It is also important to create greater cohesion and linkages between tourism-based activities and businesses in different parts of the County in order to encourage tourists to visit a wider array of attractions/activities throughout the County. 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, local and national websites, accommodation providers and at attractions themselves.”

Recommendation:

No amendment proposed.

3.2.11.11 Submission No. KE-C8-211: P.J. O’SULLIVAN

Submission Summary:

The submission states that the area that is being proposed as a car park in the Draft Plan is not suitable as it is over a half a Km from the village centre and its services and facilities.

The submission requests that the zoning of the Slate Yard be changed from S6 to N1.6 to facilitate the provision of a car park in the centre of the village. Advantages of parking at this location are outlined. The submission states that it would also “protect” the First Message Building, one of the ensembles of sites associated with The Transatlantic Cable, from “Inappropriate development” in its immediate vicinity.

The submission refers to the infill site located between the cable station terrace and the Catholic Church. The submission requests that the proposed zoning of N 1.6 for this site be removed and that the site retain the zoning that it currently has under the West Iveragh Local Area Plan 2019-2025 - M1 mixed-use.

The submission states that Kerry County Council has to date failed in its obligation to consult with the community of Valentia Island in relation to the UNESCO project.

Response:

It is not considered appropriate to amend the zoning of the S6 zoning associated with the First Message Building. This zoning and the visual corridor indicated in Figure 3.95 of the Draft Plan include a visual corridor and requires that the visual openness of this corridor and vista is maintained, supported by objective KENMD-KS-9. The restoration of the Old Slate Yard and First Message building are supported by objective KENMD-KS-13.

It is considered that in order to support objective KENDM-KS-8, that a site is identified for a car park in Knightstown. A minor amendment to the zoning map can be facilitated. Locating a car park on this site as proposed is considered to be appropriate as it is in close proximity to the pier, hotel, and church, and a car park at this location would ensure the protection of vistas to/from adjoining ACAs. A watercourse has been identified as running along the side of this site, it is therefore considered appropriate to include a 5m buffer along this watercourse. Also see response in Section 3.2.11.8 to Submission No. KE-C8-142.

The SEA does not state that there are no biodiversity interests on the R4 lands but rather that collectively the lands zoned are considered predominately (but not exclusively) to be of lower ecological value. Where biodiversity of local importance exists, objective KENMD-45 in the LAP offers sufficient protection in this regard stating that it is an objective to support biodiversity protection and enhancement measures within the LAP area...in addition, policies and objectives of the KCDP 2022-2028, must be adhered to as specifically set out under section 2.9.1.1 Biodiversity guidance, pressure and opportunities of the LAP. Therefore, any application for development that may be proposed must adhere to all the relevant policies and objectives set out in both the LAP and the CDP with respect to biodiversity.

Recommendation:

It is recommended to amend the Knightstown zoning map of the M1 Mixed Use/N1.6 Car Parking to M1 Mixed Use & G3 Buffer Space, see Amendment 37 in Section 4.13.3.

3.2.12 Portmagee

3.2.12.1 [Submission No. KE-C8-48](#): JULIE O'CONNELL

[Submission No. KE-C8-159](#): EILEEN WHELAN & JONATHAN WHELAN

[Submission No. KE-C8-220](#): EMIR O'CONNELL

Submission Summary:

This submission objects to the classification of identified properties in the LAP Strategic Flood Risk Assessment as being in Flood Zone A/B and highly vulnerable.

A submission states that this section is not based on up to date data and does not consider private infrastructure investment, but is based on historic data and broader modelling information.

This submission requests that the flood plain zoning is removed from a property in Portmagee as there is a sea wall at the rear of the property and the submission states that it has never flooded.

A submission refers to Section 3.4.8.8 of the Draft Plan where it states that there may be some seasonal tidal / coastal flooding along the waterfront in Portmagee.

The submissions request that the flood zone be removed from identified properties in Portmagee.

Response:

The submissions from the OPR (see Section 3.1.1) and the OPW (Section 3.1.10) recommend and support the inclusion of flood zone mapping in the LAP. A Strategic Flood Risk Assessment was prepared in relation to the LAP.

The areas referred to in the submissions are located in Flood Zone A/B. These flood zones are determined based on OPW CFRAM mapping. As this mapping/information is obtained from the OPW, it is not within the remit of Kerry County Council to amend same, and to omit flood zones from the map would not be in accordance with the recommendation of the OPR/OPW in relation to flood risk assessment.

Recommendation:

No amendment proposed.

3.2.12.2 Submission No. KE-C8-195: GER O'SHEA

Submission Summary:

The submission states that in every LAP for the last 20 years, that additional parking and a playground have been stated objectives for the village of Portmagee yet the Council has failed to acquire the land adjacent to the village that would realise those objectives. The submission questions a small village is zoned into different areas, residential on the western side, village centre and built up on the eastern site, it is suggested that the zoning should all be the same.

Response:

The LAP is a land use plan and therefore sets out a framework for the development of an area. On the zoning map an indicative car park is shown as part of the S3 Community Facilities zoning on the eastern side of the village. Objective KENMD-PE-8 is supportive of car parking facilities in Portmagee. This zoning would also facilitate a playground if proposed. The development of a playground is supported by Objective KENMD-PE-2 where it is an objective of the council to facilitate the sustainable development of a park and playground within the village at an appropriate location.

The R2 Existing Residential, M2 Village Centre and M4 Built Up Area reflect the various characteristics of those areas. The western part of the village is predominantly residential in nature, the village centre defines the core of the village, and the eastern side of the village is a mix of residential and some commercial/enterprise uses.

Recommendation:

No amendment proposed.

3.2.12.3 Submission No. KE-C8-196: IAN O'CONNELL

Submission Summary:

Village centre zoning

The submission states that the area designated as M4 Built up area is part of the village centre and should have an M2 zoning.

The submission highlights that the growth of the village is being held back by the lack of a suitable wastewater treatment plant, and while the absence of the adequate wastewater treatment is acknowledged it is not included as part of the 8 objectives listed for the Village for the period from 2023 to 2029

The submission requests that provision be made for the following:

1. The development of suitable wastewater treatment facilities
2. The development of a children's playground
3. The implementation of a traffic management plan for the Village in the peak summer months and sufficient car parking spaces.

Response:

It is considered that the zonings in the village reflect the various characteristics of those areas, see response/recommendation in Section 3.2.12.2 to submission KE-C8-195.

The development of the wastewater treatment plant falls under the remit of Uisce Éireann. Should Uisce Éireann put forward proposals for the upgrade of the existing wastewater treatment plant, such a proposal would be supported by objectives contained in the KCDP 2022-2028. It is also an objective of the Council (KENMD-54) as contained in the LAP to plan for future growth of the settlements in consultation with Uisce Éireann to ensure that sufficient wastewater capacity and water supply infrastructure is accounted for, and future growth is not impeded in key settlements.

The development of a playground is supported by Objective KENMD-PE-2 in the LAP where it is an objective of the Council to facilitate the sustainable development of a park and playground within the village at an appropriate location.

Traffic management issues in Portmagee are recognised in the LAP, it is an objective of this plan to provide a car park to serve the village. Footpaths are also required at a number of locations throughout the village to provide for connectivity between residential areas to the west and the east.

Recommendation:

No amendment proposed.

3.2.12.4 Submission No. KE-C8-219: GLORIA O'DRISCOLL

Submission Summary:

The submission states that Kerry County Council must make the upgrade to the Wastewater Treatment plant in Portmagee a priority in the Draft LAP 2023-2029 (it is not included in the list of main objectives for the settlement).

The inadequacies of the existing treatment plant are highlighted and the submission states that now that some of the tourist accommodations and most of the seasonal house rentals are full all year round, it has become a big problem all year round.

Submission highlights that the Portmagee Channel is a Special Area of Conservation and is protected by the National Parks and Wildlife Service.

The issue of depopulation is highlighted and the ability of the settlement to attract people to come and live and work and raise their families is highlighted. The submission states given the absence of a functioning wastewater treatment system, the question is asked where and when are people going to be able to build houses.

The submission highlights the absence of a children's playground and need for additional car parking facilities for the village while acknowledging and welcoming objectives KENMD-PE-2 and KENMD-PE-8 which specifically refers to those facilities.

Response:

See response/recommendation in Section 3.2.12.2 to Submission No. KE-C8-195.

Recommendation:

No amendment proposed.

3.3 General Submissions

3.3.1 Valentia Island / UNESCO

3.3.1.1 [Submission No. KE-C8-16](#): PETER BROWNE

Submission Summary:

This submission requests that the property, The Telegraph Field (ref as single storey structure at Coarha Beg) deleted from the Record of Protected Structures and to also have the ACA removed on this property.

The submission also suggests that an amendment be made to the wording of Section 2.6.2.3 in the LAP.

Response:

The protected structure referred to in the submission is listed in the Record of Protected Structures as included in Volume 3 of the KCDP 2022-2028.

Kerry County Council added this protected structure to the record of protected structures, and in doing so demonstrated the case for its addition at that time. There have been no changes to the structure since then that would warrant reconsideration of the status of this structure, it is therefore not proposed to amend the Record of Protected Structures. It should also be noted that a decision was taken by the members of Kerry County Council in relation to a submission on the Draft KCDP 2022-2028 to not delete this structure from the Record of Protected Structures.

Details of ACAs in the county are included in Volume 3 of the KCDP 2022-2028. Based on the significance of this site, it is considered appropriate to not amend the ACA.

It is considered appropriate to include a reference to the Telegraph Field in Section 2.6.2.3 as follows;

For 100 years, the Valentia Cable Stations ~~was~~ were the hub of transatlantic communication. The Cable Station and slate yard in Knightstown, *and the Telegraph Field in Foilhommerum*, are of enormous national and international heritage value in terms of their industrial archaeology, history, and contribution to mankind's technological progress.

Recommendation:

It is recommended to amend the text of Section 2.6.2.3 as follows;

For 100 years, the Valentia Cable Stations ~~was~~ were the hub of transatlantic communication. The Cable Station and slate yard in Knightstown, *and the Telegraph Field in Foilhommerum*, are of enormous national and international heritage value in terms of their industrial archaeology, history, and contribution to mankind's technological progress.

3.3.1.2 [Submission No. KE-C8-18](#): LUCIAN HORVAT**Submission Summary:**

The submission states that it is imperative to address the rehabilitation of the access road to Valentia Lighthouse at Cromwell Point as the road has depreciated. The road needs to be widened and the coastal erosion issues resolved. It also states that the resurfacing the small carpark would be important to visitors.

Response:

This road has been taken in charge by Kerry County Council. To address issues of coastal erosion in relation to this road state funding would be required in order to progress these works.

Recommendation:

No amendment proposed.

3.3.1.3 [Submission No. KE-C8-19](#): JOHN O'SULLIVAN
[Submission No. KE-C8-24](#): JOHN O'SULLIVAN
[Submission No. KE-C8-54](#): GERARD EGAN
[Submission No. KE-C8-60](#): DONAL MURPHY
[Submission No. KE-C8-68](#): PAUL CURTIN
[Submission No. KE-C8-70](#): SEAN O'SULLIVAN
[Submission No. KE-C8-71](#): CONN O'SHEA
[Submission No. KE-C8-77](#): PAT CURTIN
[Submission No. KE-C8-81](#): NOREEN MURPHY
[Submission No. KE-C8-82](#): JOHN PATRICK MURPHY
[Submission No. KE-C8-83](#): PATRICK MCCARTHY
[Submission No. KE-C8-89](#): JOHN MCCARTHY
[Submission No. KE-C8-95](#): MAURICE & MARY O'SULLIVAN
[Submission No. KE-C8-102](#): EILEEN BURNS MURPHY & NEILIE MURPHY

[Submission No. KE-C8-103](#): MAUREEN SHEAN
[Submission No. KE-C8-106](#): KATHLEEN MURPHY
[Submission No. KE-C8-107](#): PORTMAGEE DEVELOPMENT GROUP CLG

[Submission No. KE-C8-108](#): GERARD O'SHEA
[Submission No. KE-C8-110](#): JOSEPH O DRISCOLL
[Submission No. KE-C8-118](#): DENIS O'CONNOR

[Submission No. KE-C8-127](#): GERARD O'SULLIVAN
[Submission No. KE-C8-128](#): GERARD MURPHY
[Submission No. KE-C8-129](#): CONOR O'NEILL
[Submission No. KE-C8-131](#): RYAN CASEY
[Submission No. KE-C8-133](#): SINEAD O'SULLIVAN
[Submission No. KE-C8-135](#): REBECCA MCALEESE
[Submission No. KE-C8-136](#): PATRICK O'SULLIVAN
[Submission No. KE-C8-137](#): STEPHEN MURPHY
[Submission No. KE-C8-138](#): JERRY & KATHLEEN O'DRISCOLL
[Submission No. KE-C8-139](#): HELEN O'SULLIVAN
[Submission No. KE-C8-146](#): VALENTIA/PORTMAGEE H&CSA DESIGNATION ACTION GROUP

[Submission No. KE-C8-147](#): CLAIRE O'SULLIVAN
[Submission No. KE-C8-152](#): ALMA O'SULLIVAN
[Submission No. KE-C8-154](#): PATRICK STEPHEN & SUSAN O'CONNELL

[Submission No. KE-C8-156](#): SKELLIG RETREAT
[Submission No. KE-C8-157](#): EMIR O'CONNELL
[Submission No. KE-C8-160](#): MUIRIS O'SULLIVAN
[Submission No. KE-C8-161](#): SHILAGH MCCARTHY & MARGARET MCCARTHY

[Submission No. KE-C8-162](#): BRIAN O'SULLIVAN

[Submission No. KE-C8-163](#): JAMES SUGRUE
[Submission No. KE-C8-164](#): JULIE O'CONNELL
[Submission No. KE-C8-167](#): PATRICK O'DONOGHUE
[Submission No. KE-C8-168](#): GERALDINE KIRBY
[Submission No. KE-C8-169](#): MUIRIS & BERNIE O'DONOGHUE
[Submission No. KE-C8-170](#): EMER O'SULLIVAN
[Submission No. KE-C8-174](#): JOE, JACK & DENNIS O'DRISCOLL
[Submission No. KE-C8-176](#): KAREN MURPHY
[Submission No. KE-C8-177](#): MICHAEL B MURPHY
[Submission No. KE-C8-178](#): RACHEL O'CONNELL
[Submission No. KE-C8-179](#): TERESA MCCARTHY
[Submission No. KE-C8-185](#): SUSAN O'BRIEN
[Submission No. KE-C8-186](#): GLORIA O'DRISCOLL
[Submission No. KE-C8-188](#): IAN O'CONNELL
[Submission No. KE-C8-191](#): SHANE LOWNEY

[Submission No. KE-C8-192](#): SKELLIG RANGERS
[Submission No. KE-C8-193](#): NOEL LYNCH
[Submission No. KE-C8-194](#): ANN MARIE SPILLANE
[Submission No. KE-C8-200](#): MARK LYNCH
[Submission No. KE-C8-201](#): BRIAN MCHUGH
[Submission No. KE-C8-202](#): LOUISE O SULLIVAN
[Submission No. KE-C8-203](#): LOUISE O'SULLIVAN
[Submission No. KE-C8-204](#): LAURA O'SULLIVAN
[Submission No. KE-C8-205](#): ANN MCLAUGHLIN
[Submission No. KE-C8-208](#): MARK O'CONNELL
[Submission No. KE-C8-210](#): SEAN O'SULLIVAN
[Submission No. KE-C8-214](#): P.J. O'SULLIVAN
[Submission No. KE-C8-215](#): PATRICK O'SHEA
[Submission No. KE-C8-216](#): LEONA & DAVID LYONS
[Submission No. KE-C8-217](#): NORA MURPHY

Submission Summary:

These submissions raise concerns in relation to the Heritage & Culturally Sensitive Areas [H&CSA] associated with the UNESCO designation and seek the removal of same from the Plan. The impact of the proposals in the Draft LAP on the residents of the area is of concern in the submissions, and they consider that they will result in restrictions on development in these areas. The submissions state that there is an unacceptable and disappointing level of uncertainty and a lack of transparency as to how this will impact the local community in practical terms.

There are requests that the areas identified in Figures 2.8 and 2.9 as contained in the Draft Kenmare Municipal District Local Area Plan 2023-2029 be omitted from the Plan.

Support for the UNESCO application is also expressed in some submissions.

Response:

The concerns raised in the submissions are noted. As stated in Section 3.1.11 of this report, it must be reiterated that the nomination for World Heritage designation is being brought forward jointly by Kerry County Council and the Government of Newfoundland and Labrador as lead proponents (for one transnational application) in partnership with the National Monuments Service, Parks Canada, the Valentia Island Development Company and Valentia Island Trans-Atlantic Cable Foundation. It is noted that the Ensemble was added to both Ireland's and Canada's respective Tentative Lists of World Heritage sites in 2022 and it is anticipated that work on the formal nomination will commence in 2024 and will take a minimum of five years. It was previously the policy of the Council in the Cahersiveen FALAP 2013-19 and the West Iveragh

LAP 2019-2025 to support the sensitive redevelopment of these buildings. The current West Iveragh LAP 2019-2025 and the KCDP 2022-2028 further supports this designation.

The Council has worked with the Valentia Island Development Company and Valentia Island Trans-Atlantic Cable Foundation regarding this nomination. A number of meetings were held with the wider community in order to clarify a number of the issues and concerns raised.

The structure in the Telegraph Field does not form part of the UNESCO application. The Proposed Heritage and Culturally Sensitive Areas [H&CSA] as per Section 2.6.2.1 and associated maps (Area 01 Knightstown and Area 02 Telegraph Field) provided a framework within the LAP to support UNESCO World Heritage site nomination. These denoted areas did not by their nature infer or impart any form of statutory zoning status but rather served as an indicator of the importance of the areas which through their setting positively contributes to the World Heritage Status hoping to be afforded to these areas. This importance is both on a local and global scale. These denoted areas are a requirement as part of the UNESCO world heritage status application process and are necessary as other locations globally do not have the statutory ability to protect World Heritage Sites from inappropriate development. Ireland unlike some countries that are bound by the same application process requirements enjoys the statutorily based security of a robust planning system by which decisions on planning related matters are decided.

This robust planning system is reflected by the existing designations that apply across the County as contained in the KCDP 2022-2028, which include visually sensitive areas, views and prospects, protected structures, architectural conservation areas and archaeological landscapes. In addition, the KCDP 2022-2028 also seeks to protect all environmental designations. Development in designated areas will only be considered subject to satisfactory integration into the landscape and compliance with the proper planning and sustainable development of the area. On the basis of these existing designations, Kerry County Council is satisfied that the existing designations in the KCDP 2022-2028 affords sufficient safeguards to protect the area around the Telegraph Field from inappropriate development. It is therefore considered appropriate to omit Figure 2.9 in the LAP.

The UNESCO application (nomination for World Heritage status) is fully supported by Kerry County Council, and both the KCDP 2022-2028 and the LAP contain policies and objectives to achieve this goal.

Recommendation:

It is recommended to omit Figure 2.9: Area 2 Telegraph Field H & CSA.

(consequential text changes to Section 2.6.2.1 as a result of this change to omit reference to Area 2 are considered to be non material)

3.3.1.4 [Submission No. KE-C8-61: VALENTIA ISLAND DEVELOPMENT COMPANY C.L.G.](#)

Submission Summary:

Knightstown

The submission states that there should be Planning Protection for the Valentia Cable Building site to ensure that the world heritage UNESCO application is successful. There is an urgent need for more commercial outlets of all types in the village and call on Kerry County Council to

designate an area for Casual Trading. Fast-track the necessary finance to expand the WWTP and once this occurs the boundary will need to be expanded and accommodate affordable housing. VIDCo has plans for a Digital Hub in The Cable Station as well as the Cable Experience Visitor Centre. VIDCo has purchased the Slate Yard and has plans to develop it into a Village Centre. This will include the restoration of The First Message Building and its conversion to a Cable Museum. VIDCo envisage the Slate Yard to be a focal point of the Village with outdoor seating, tables and planting etc. Knightstown Marina - As a follow-up to the investment in the breakwater system at Knightstown Marina, would like to get this project re-introduced on the Kerry Co. Co. list of priorities.

Reenard Point

The submitter would like an objective that the slipway at Reenard Point be repaired and expanded to facilitate and future proof the Valentia Ferry operation which is an essential corridor to the island and necessary to facilitate the increased volume of visitors that will result from the greenway and potential UNESCO status.

Chapelstown

The submission supports Chapelstown is designated for light industry. Also recommending that a recreation area/park should be planned in Chapelstown.

Affordable Housing

The submission would like to see the boundary of Chapelstown Village extended on all roads and is looking at the provision of affordable housing. Kerry County Council purchased a site for a Water Treatment Plant for Chapelstown over 25 years ago. We believe this could be developed as ICW (Integrated Constructed Wetlands) to serve the village, at a reasonable cost and, yes, UNESCO Designation can be used as a means of raising the required capital from the Central Government for this.

Valentia Lighthouse

The submission states that the road to Valentia Lighthouse has been eroded and undermined by sea storms and now there is a serious danger of the lighthouse becoming totally cut off. There is an urgent need for the road and car park to be repaired.

Heritage Sensitive Areas

The submission states they are aware of the UNESCO stipulation for a protected zone around industrial world heritage sites. The Valentia sites are required to comply with UNESCO criteria but it is their understanding that development will be permitted within these areas as stated by the Kerry County Council. They submit that these "sensitive heritage areas" be kept to an absolute minimum and that the area around Foilhommerum, and the land area indicated across the channel to Portmagee, be removed from the Local Area Plan.

Response:Knightstown

There are a number of sites in Knightstown on the Record of Protected Structures as contained in Volume 3 of the KCDP 2022-2028. Lands have been zoned in Knightstown that would accommodate employment. Uisce Éireann (see Section 3.1.13) in their submission refer to the wastewater treatment plan in Knightstown and its upgrade. As per Objective KENMD-37, the Renard to Knightstown Ferry is being supported including the sustainable upgrading of enabling infrastructure.

Renard

As set out in the Draft LAP, the Council fully supports the operation of the Renard to Knightstown ferry service and the sustainable upgrade of enabling infrastructure, which is reflected in Objective KENMD-37.

Chapelstown

Areas are zoned M2 in the village and areas are zoned G1 (open space/spark). Lands are therefore zoned that would accommodate the request of the submission regarding employment and open space.

Lands have been zoned R4 Strategic Residential Reserve in Chapelstown, and along with the lands zoned M2 Village Centre where residential development would also be considered, sufficient lands have been zoned in the settlement to cater for its needs over the lifetime of the LAP.

Valentia Lighthouse

This road has been taken in charge by Kerry County Council. To address issues of coastal erosion in relation to this road state funding would be required in order to progress these works.

Heritage Sensitive Areas

See responses/recommendations in Sections 3.1.11 and 3.3.1.3 in relation to these areas.

Recommendation:

No amendment proposed.

3.3.1.5 Submission No. KE-C8-126: DONARD DE COGAN (Chairman of the World Heritage Ireland-Canada Technical Group)**Submission Summary:**

The submission is made by the Chairman of the World Heritage Ireland-Canada Technical Group in support of the new Draft Plan 2023-2029, in particular, the policy objectives which aim to protect the Transatlantic Cable sites on Valentia Island and secure their inscription as a UNESCO World Heritage Site, together with its partner cable station in Heart's Content, Newfoundland in Canada. The submission states that the Plan should be adopted as it stands with every effort made to ensure that World Heritage inscription will follow in due course.

Response:

This submission of support of the Draft LAP, in particular the objectives that aim to protect the transatlantic cable sites on Valentia Island is welcomed.

See responses/recommendations in Sections 3.1.11 and 3.3.1.3.

Recommendation:

No amendment proposed.

3.3.2 Rural**3.3.2.1 [Submission No. KE-C8-12: WILLIAM BROWNE](#)****Submission Summary:**

Requests that land specified in this submission retains its light industrial zoning, the site is located 2.5km to the west of Killorglin town.

Response:

The site is greenfield and the adjoining land use is a car garage with Promed located to the west of the garage. As is stated in the submission the site is located 2.5km west of Killorglin.

Access to the site is from the N70 where the maximum speed limit applies. The relevant provisions of the KCDP 2022-2028 with regards to access onto national roads is to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 km/h apply. This provision applies to all categories of development. This objective is supported by;

Objective KCDP 14-29, to 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, and

Objective KCDP 14-30, to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to National Roads to which speed limits greater than 60 km/h apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.

The proposal to zone these lands would therefore contravene the provisions of the Development Plan in relation to access onto National Roads.

The lands are not serviced.

It is not the policy of the Council to zone lands for specific uses in the rural area, development in these areas is assessed against the policies contained in the Development Plan.

It is therefore not considered appropriate or in accordance with the proper planning and sustainable development of Killorglin to zone lands for industry in the rural area outside of the town.

Recommendation:

No amendment proposed.

3.3.2.2 Submission No. KE-C8-33: JOHN O'CONNOR

Submission Summary:

The submission contains a proposal to extend to public carpark at Baleen as a two level development with carpark on the top level and public facilities such as a tea room on the lower level.

Response:

This is a proposal to extend the public carpark at Baleen (Com an Chiste) with additional public facilities. The carpark is located along the N70 along the Ring of Kerry /Wild Atlantic Way (WAW). There is also a designated Wild Atlantic Way Discovery Point with specular views in all directions. It must be noted that Kerry County Council are committed in conjunction with Failte Ireland to sustainably improve facilities along the WAW route however this is strictly subject to appropriate environmental assessments. It is an objective of the LAP, KENMD-30, to facilitate the sustainable development of viewing points and other facilities along the Wild Atlantic Way at appropriate locations.

This area is designated as a Visually Sensitive Area in the KCDP 2022-2028 with protected views and prospects. This site is also contiguous to both a Natural Heritage Area and a Special Area of Conservation. It is the policy and objective of the development plan to protect such areas.

It is not the policy of the Council to zone lands for specific uses in the rural area, development in these areas is assessed against the policies contained in the Development Plan.

Recommendation:

No amendment proposed.

3.3.2.3 Submission No. KE-C8-46: TLS GROUP MERCHANTS, TONY O'SULLIVAN & FAMILY, AND ARTHUR MCCARTHY

Submission Summary:

The submission requests that land at Cromane point be zoned for aquaculture purposes, Light Industrial C2.1.

Response:

The site is located in the rural area, outside of any settlement. The lands are not serviced, nor can they be.

This area is designated as a visually sensitive area in the KCDP 2022-2028 with protected views and prospects.

There is some overlap of the site by cSAC, pNHA and SPA. It is the policy and objective of the KCDP 2022-2028 to protect such areas. A recent application to retain an existing hard stand area and associated rock armour as constructed (Planning Reg. No. 23/750) was returned to the applicant as under section 34(12) of the Planning and Development Act 2000 (as amended), the Planning Authority is precluded from considering the retention application as it is considered the development concerned would have required an AA and it is also considered that the development concerned would have required a determination as to whether an Environmental Impact Assessment (EIA) would have been required.

It is not the policy of the council to zone lands for specific uses in the rural area, development in these areas is assessed against the policies contained in the Development Plan.

Recommendation:

No amendment proposed.

3.3.2.4 Submission No. KE-C8-113: CIARAN MORIARTY

Submission Summary:

The submission requests the zoning of a site in Cromane opposite Jacks' Coastguard Restaurant for Tourism and related, for the provision of glamping and/or campervan parking.

Response:

The site is located in the rural area, outside of any settlement, it would be approx. 500m north of the settlement of Cromane. The lands are not serviced.

This area is designated as a Visually Sensitive Area in the KCDP 2022-2028.

For a camping/glamping site to be considered in accordance objective KENMD-SV-1 the site would have to be within the small village settlement, but as stated above, it is approx. 500m outside of Cromane.

It is not the policy of the council to zone lands for specific uses in the rural area, development in these areas is assessed against the policies contained in the Development Plan. It is the policy of the Council to support tourism development at an appropriate scale and location in accordance with Chapter 10 Tourism & Outdoor Recreation as contained in the KCDP 2022-2028.

It is therefore considered that a proposal to zone lands for tourism in an unserviced rural area would not be in accordance with the proper planning and sustainable development of the area.

Recommendation:

No amendment proposed.

3.3.2.5 [Submission No. KE-C8-140: BRENDAN ECCLES](#)**Submission Summary:**

The submission requests the zoning of a site at Caragh Bridge, Ballentleave, Glenbeigh for "tourism and related" activities, allowing the integration of glamping facilities, camper van parking, restrooms, and parking.

Response:

This area is designated as a visually sensitive area in the KCDP 2022-2028 with protected views and prospects.

It is not the policy of the council to zone lands for specific uses in the rural area, development in these areas is assessed against the policies contained in the Development Plan. It is the policy of the Council to support tourism development at an appropriate scale and location in accordance with Chapter 10 Tourism & Outdoor Recreation as contained in the KCDP 2022-2028.

It is therefore considered that a proposal to zone lands for tourism in an unserviced rural area would not be in accordance with the proper planning and sustainable development of the area.

Recommendation:

No amendment proposed.

3.3.2.6 [Submission No. KE-C8-141: STEVE O'SULLIVAN](#)**Submission Summary:**

This submission requests that the settlement boundary for Tuosist is extended to the east towards the school and GAA complex.

Response:

The area defined in the LAP for Tuosist includes a number of potential sites that would allow for the development of the village in a sequential manner. The defined boundary is considered to be the focal point for the settlement. This is confirmed by the existence of services within the boundary and the adjoining sports complex.

It is considered that in order to ensure that future residential (or otherwise) development is located centrally, this is best served by the boundary as defined in the Draft Kenmare LAP. It is the policy of the LAP that all development in these settlements should contribute to improvements in the villages' urban form and shall preserve their character, heritage and natural features.

Recommendation:

No amendment proposed.

3.3.3 Municipal District Submissions**3.3.3.1 [Submission No. KE-C8-13](#): CHARLIE CURRAN****Submission Summary:**

Requests that a footbridge be constructed connecting Waterville beach and Waterville golf course with Reenroe beach. The submission states this would be an invaluable amenity to the area.

Response:

It is the policy of the Council as contained in both the KCDP 2022-2028 and the LAP to facilitate the sustainable development of walkways throughout the County thus creating greater permeability between the urban and natural environment. All proposed development and/or enhancement of walkways will be subject to environmental assessment. However, there are substantial environmental constraints associated with this type of proposal including ecology and archaeological issues.

Recommendation:

No amendment proposed.

3.3.3.2 [Submission No. KE-C8-62](#): TASC FHÓRSA UÍBH RÁTHAIGH**Submission Summary:**

Tascfhórsa Uíbh Ráthaigh welcomes that their work is included in Section 2.1.2 and in particular objectives KENMD-BG-3 and KENMD-BG-5. The submission welcomes the focus given to the importance of the Irish language, both within and outside the Gaeltacht area. The work of Kerry County Council in the preparation of the Language Plan for Cathair Saidhbhín is acknowledged. It is requested that Objective KENMD-14 includes reference to the draft Language Plan of Nascadh Uíbh Ráthaigh.

The submission welcomes objectives in relation to wastewater treatment in the LAP as it is seen as a very positive step that settlements where clusters served by individual treatment systems may be considered included in Table 3.1.

In relation to housing, the submission welcomes the inclusion of Objective KENMD-19 but requests that this objective is extended to include the small settlements of An Gleann and An Chillín Liath, and reference to the development of a community-led affordable housing project in Gaeltacht Uíbh Ráthaigh.

The submission welcomes the provisions of section 3.2.1.5.1 Cahersiveen Town Centre Regeneration Project, and in particular the developments planned within that project for The Skellig Centre for Research and Innovation (Skellig CRI).

The submission supports the proposals relating to transport in the Draft LAP. The submission welcomes the inclusion of objective KENMD-BG-6 and seeks the inclusion of a similar objective relating to Dún Géagáin where improvements would be hugely beneficial to that settlement and encouraging of active travel behaviour.

Objectives relating to tourism in the draft LAP are welcomed. The submission requests the inclusion of an objective, to seek to support the development of licenced trading pitches at locations including at beaches, etc. The submission also requests that the proposed network of cycle routes in An Dromaid, currently the subject of an ORIS Measure 1 application by SKDP be included as an objective.

Response:

The submission is noted. It is the policy of the Council to promote and develop the Uíbh Ráthach Gaeltacht as a centre of linguistic and cultural heritage in tandem with policies that will encourage sustainable economic development in order to ensure vibrant communities. The Council will continue to engage with all stakeholders to further promote sustainable economic development.

Objective KENMD-14 seeks to facilitate and support Language Plans. It is considered appropriate to also include reference to the Nascadh Uíbh Ráthaigh language plan within this.

Objective KENMD-19 seeks to support the provision of sustainable accommodation projects with the Gaeltacht settlements of Baile an Sceilg and Dún Géagáin. It is considered appropriate to include reference to An Gleann and An Chillín Liath, and reference to the development of a community-led affordable housing project in Gaeltacht Uíbh Ráthaigh.

It is considered appropriate to make minor textual changes to Sections 2.6.1.2 and 3.4.1 of the LAP.

It is considered appropriate to include an additional objective in Dún Géagáin, seeking the improvement of pedestrian connectivity from the village to the beach.

It is the policy of the KCDP 2022-2028 and this LAP to seek the provision of facilities at beaches and other amenity locations, subject to environmental assessments. It is also an Objective KCDP 11-58, to regularise beach related commercial facilities in the coastal areas so as to protect the overall integrity of the sand dunes. It is considered that licenced trading pitches may be considered where appropriate and subject to environmental assessment.

Recommendation:

It is recommended to amend Objective KENMD-19 as follows;

Support Údarás na Gaeltachta & Coiste Forbartha na Sceilge in relation to projects for the provision of sustainable accommodation projects within the Gaeltacht settlements of Baile an Sceilg, Dún Géagáin, An Gleann and An Chillín Liath, and other community-led affordable housing projects in Gaeltacht Uíbh Ráthaigh.

It is recommended to amend Objective KENMD-14 as follows;

Facilitate and support Language Plans - Brí Uíbh Ráthaigh–Plean Teanga Chiarraí Theas 2019-2026, (Language Plan for South Kerry) and the language plan for Cahersiveen, a designated Baile Seirbhíse Gaeltachta, and Nascadh Uíbh Ráthaigh, to achieve their target of increasing the number of daily Irish Speakers.

It is recommended to include an additional objective for Dún Géagáin (General Objectives) as follows;

Seek the improvement of pedestrian connectivity between the village & beach, subject to environmental assessments.

It is recommended to amend the text of Section 2.6.1.2 as follows;

~~2.6.1.2 Uíbh Ráthach Task Force Tascfhórsa Uíbh Ráthaigh~~

~~The Uíbh Ráthach Gaeltacht Interagency Taskforce published an integrated cross sectoral regeneration plan for the region in July 2019 with the focus on employment and quality of life. The plan seeks to create 145 full-time jobs and a 3% increase in population with a focus on developing innovations in alternative farm enterprises, the development of a digital hub and an increase in tourist visitors. The report also targets a 5% increase in daily Irish speakers and the reestablishment of an Irish language summer college, in order to combat falling levels of spoken Irish in the area. This Plan supports the ambitions of the Uíbh Ráthach Task Force and any reports/plans/actions that they promote in keeping with the principles of proper planning and sustainable development~~

The Action Plan for Rural Development (2017) proposed that a Task Force should be established for the Gaeltacht area of Uíbh Ráthach to address issues pertaining to population structural deficiencies. The development of an integrated, cross sectoral plan for the Uíbh Ráthach Gaeltacht to address the social and economic needs of the community was proposed and an ambitious regeneration plan for the region was launched in July 2019. The areas of focus in that plan centred on employment and quality of life improvements as facilitators of population growth and restructuring. A second action plan for the period 2023-2026 has been adopted by the Tascfhórsa, building upon the steps taken in phase one and focusing on critical enablers of economic growth and development as well as building further foundations for key quality of life initiatives in the area. This LAP supports the ambitions of the Uíbh Ráthach Task Force.

It is recommended to amend the text of Section 3.4.1.6 as follows;

~~The gteic hub at Ballinskelligs provides remote working facilities. The project received financial supports through rural development funding. The facilities currently centre on six coworking spaces divided across two rooms, along with kitchenette facilities and with 1GB fibre broadband available.~~

The gteic hub at Baile an Sceilg, developed by Údarás na Gaeltachta, provides remote working facilities. The facilities currently centre on six coworking spaces divided across two rooms, along with kitchenette facilities and with 1GB fibre broadband available. A purpose-built hub, to encompass co-working facilities, training and meeting rooms and other office space is currently being constructed in the Údarás na Gaeltachta.

When completed, this facility will provide workspace for c.50 individuals. This project has received financial support through rural development funding, co-funded by Údarás na Gaeltachta.

3.3.3.3 [Submission No. KE-C8-90:](#) **ARJEN STOFBERG**

Submission Summary:

The submission strongly urges the Council to look at creating an Aire camping site, such as the one in Cobh, as there is a lack of such facilities in the county.

Response:

The principle of an Aire camping/campervan type development would be supported by the LAP and it would also be required to comply with Section 10.3.5.1 of the KCDP 2022-2028 which covers Camping/Glamping, Campervans and Caravans which is supported by the following objective:

KCDP 10-31 Support the 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.

Recommendation:

No amendment proposed.

3.3.3.4 [Submission No. KE-C8-99:](#) **GREEN PARTY – KENMARE LEA**

Submission Summary:

The submission raises the following points:

Towns and Villages - Welcomes focus of development of towns and villages as it is in keeping with Green Party policy to develop town centres first - target of 30% of new housing to be in towns and villages seems low, However, reassuring that planning applications for holiday homes will not be allowed on residential zoned land. Look forward to the publication of the Town Centre First Masterplan for Milltown.

Sustainable Transport - Land has been zoned for carparking but provision of proper bus stations/ shelters required. Kenmare requires bus shelters and Killorglin may require additional ones. Permeable systems and planting (such as the one used at Kenmare Community Hospital) should be used within carparks as a measure to prevent flooding.

Flood Risk - Due to recent events minimising flood risk in towns and villages is now high priority. Strategic Flood Risk Assessment should prioritise nature-based flood relief. A whole-river approach needs to be the preferred method, of dealing with inland flooding.

Integrated Constructed Wetlands - currently have a small Integrated Constructed Wetland for the removal of waste water in Rossbeigh and a feasibility study done for one in Ballinskelligs. As such wetlands can become amenity areas for the public, this plan should give greater

consideration to developing such systems. 32 villages across the county are without wastewater treatment plants, many of them close to the sea. In this municipal district, Caherdaniel, Castlecove and Cromane need systems and may well be suitable for ICWs. The Local Area Plan should pay more attention to this.

Recreation & Amenity - The Ring is an area ideal for recreation and tourism, and we are economically dependent on visitors. We need to use our resources wisely and observe the changing nature of the tourism business. The development of the South Kerry Greenway and the creation of the Dark Sky Reserve are good examples of this. Extending the Reserve to Glenbeigh and Blackwater Bridge are welcome.

The work of the Live Project in Iveragh (About — Discover Iveragh) was excellent and Kerry County Council officials working in this area should all be made familiar with its focus on effective tourism to sustain the coastal communities of the Ring.

The submission acknowledges that the Plan's emphasis on Blueways is commendable. These must be developed and progressed as part of a sustainable tourism effort.

Response:

The contents of the submission are noted.

The provision of bus shelters would form part of the public realm, the development of which is therefore supported in the LAP and in the KCDP 2022-2028. The LAP zones land for use as car parks but specific proposals in relation to same would occur in the design of the project. It is envisaged that some form of bus parking would be accommodated in future car park proposals. Objective KENMD-52 of the Draft LAP would address the concerns raised in relation to flood risk and car parks.

The LAP was subject to Strategic Flood Risk Assessment. SuDS is supported by objectives in the LAP and by the KCDP 2022-2028. Developments that are proposed are therefore subject to the principle of SuDS and compliance with associated objectives and policies in the plans.

As contained in the KCDP 2022-2028, it is an objective of the Council, KCDP 13-1, to 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, 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.

Recommendation:

No amendment proposed.

3.3.3.5 [Submission No. KE-C8-101: NASCADH UÍBH RÁTHAIGH](#)

Submission Summary:

The submission welcomes the Council's support for the Irish language and for housing for Irish speakers. Many of the issues raised are contained in submission KE-C8-62 and dealt with there.

It is stated that it is very important to focus attention on the housing supply issue in the area and further welcomes the sentence that "It is critically important that people have opportunities available to them to use Irish daily in the community outside of the education system" but stress that this must be facilitated.

It states that Nascadh Uíbh Ráthaigh have prepared the language plan and therefore requests that, reference should be made to the three complementary language plans for South Kerry.

The submission also welcomes the Council's support it has given to Nascadh Uíbh Ráthaigh to date and look forward to continuing working with them over the coming years.

Response:

Submission is noted.

See response and recommendation in Section 3.3.3.2 to submission KE-C8-62.

Recommendation:

No amendment proposed.

3.3.3.6 [Submission No. KE-C8-222: COMHCHOISTE GHAELTACHT UÍBH RÁTHAIGH](#)

Submission Summary:

The submission welcomes the Council's support for the Irish language and for housing for Irish speakers.

It is stated that it is very important to focus attention on the housing supply issue in the area.

The submission highlights that Cahersiveen is a Baile Seirbhíse Gaeltacht town and its role in promoting Irish should be referred to in the paragraph that relates to Cahersiveen and this could be used to improve the energy and life of Cahersiveen town.

The submission states that it is important to have concrete aims instead of just abstract support with respect of promoting Irish. The importance of the language should be highlighted earlier in the list of strategic aims and it should be clear that the Council accepts the basic foundations

of language planning. A dedicated official should be employed to work directly with Oifigeach Forbartha Gaeilge to advance Irish in the Kenmare area.

The submission points out that in Uíbh Ráthach there are only 3 parcels of land zoned residential in Baile an Sceilg and Dún Geagáin. No zoned land exists in Ghleann/Bá Fhionáin or in Cillín Liath. The absence of zoned land, where language clause conditions would be applied does not align with aims of the Council to support the increase in the daily number of Irish speakers. It also refers to the list of villages set out under section 3.1.1.3, it is stated that given there is to be no R1 residential zoned lands within these villages, that the language condition will only apply to three small patches of land. The submission states that the language clause should apply to cluster development proposed in villages/ small village settlements/ as set out under Section 5.4 of KCDP 2022-2028.

In addition, there is no aim set out that would assist Irish speakers outside of the settlements i.e. in the rural area and Gaeltacht Uíbh Ráthaigh is a rural area.

Overall, it is stated that the Local Area Plan has not sufficiently demonstrated that it is the aim of the Council to develop conditions where it is possible to live their whole life through Irish. The following suggests are made:

That a language impact assessment be carried out as part of every planning application (apart from a private house).

It is requested that KENMD-13 is amended; Promote and develop the Uíbh Ráthach Gaeltacht as a centre of language in tandem with policies that will encourage sustainable economic development in order to ensure vibrant communities.

Submission requests that language clause condition should apply to clusters within the Gaeltacht (see s2.10.1).

Regarding KENMD – 68.; It is important that as the population in Waterville increases every effort is made to increase the percentage of Irish speakers there as Waterville has a central daily role for the community of Gaeltacht Uíbh Ráthaigh.

It is requested to amend KENMD – 70 to include reference to an increase the number of daily Irish speakers in the area.

Regarding community transport issues it is important that regular bus services be available. Highlights that there has to be a regular daily transport service similar to Corca Dhuibhne and An Rinn.

Regarding pedestrian safety it is requested to provide a path in Baile an Sceilg along the R566 between Gala/Brown's shop and the playground and in An Gleann between the day centre and the school.

Response:

Many of the issues raised are contained in submissions KE-C8-62 (Section 3.3.3.2) & KE-C8-101 (Section 3.3.3.5) and are dealt with in the responses/recommendations to these submissions.

It is stated in Section 3.2.7.1 of the LAP that Cahersiveen has been designated as a Baile Seirbhíse Gaeltachta. 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.

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. The KCDP 2022-2028 (see Section 8.1) and this LAP recognise that the Irish Language is an integral part of the survival, growth and promotion of the Gaeltacht. The Gaeltacht depends on the survival, growth and promotion of the Gaeltacht Communities.

The protection of the linguistic and cultural heritage of the Gaeltacht including the promotion of Irish as the community language is included as a Strategic Issue (see Section 2.1.4, pg 16) of the LAP. The LAP seeks to protect the linguistic heritage of the Gaeltacht in including the promotion of Irish as the community language.

The Council have developed the Scéim Gaeilge 2018 – 2023 which seeks to promote the use of Irish. In particular Kerry County Council's 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.

Kerry County Council's 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.

Regarding the residential zoned lands within the settlements, it is the policy of the Council as contained in the Core Strategy of the KCDP 2022-2028 to zone lands for specific residential use in line with both the Settlement Hierarchy and in those villages where there is waste water infrastructure. Baile an Sceilg and Dún Geagáin are classified as villages, while An Ghleann and An Chillín Liath are small village settlements.

In the above villages some land has been zoned under the category of R4 (Strategic Residential Reserve). This is to cater for those cases where land is centrally located and suitable for future residential use, however adequate water infrastructure is not in place to facilitate development at this time. Within An Ghleann and An Chillín Liath, small scale residential cluster developments served by individual wastewater treatment systems.

It is the policy of the KCDP 2022-2028 to support the sustainable development of these villages and small village settlements, in a compact manner. This plan seeks to ensure the vitality and long-term functioning of towns and villages as it is critically important to ensure vibrant rural communities. The Council will facilitate the development of housing within these settlements primarily for permanent place of residence but also for tourism/holiday use. Within this context it is considered both restrictive and inappropriate to attach a language clause condition on these developments.

It is also noted Kerry County Council require the submission of a Linguistic Impact Statement for housing proposals for three or more houses in the Gaeltacht area in order to protect and strengthen the Irish language and cultural heritage of the Gaeltacht areas. All those applications are also referred to An Coimisinéir Teanga for comment.

It is considered appropriate to amend objective KENMD-70 to include reference to an increase in the number of daily Irish speakers in the area.

Regarding pedestrian safety, it is the policy of the Council to promote pedestrian safety, greater connectivity and active travel measures throughout the LAP area. Within this context it is an objective of the LAP, KENMD-59, to facilitate the carrying out of the works stated in the 'Schedule of MD Works Plan' for the Kenmare MD which are compatible with environmental protection objectives for the area. Kerry County Council have an ongoing programme of work to upgrade and/or improve both roads and footpaths.

Recommendation:

It is recommended to amend Objective KENMD-70 as follows;

Ensure that all new development shall maintain the integrity of the surrounding rural landscape and rural character of the settlement while ensuring that future development supports the existing role and function of the village as a small local focal point for its surrounding rural community *and that it supports the aim to increase the number of daily Irish speakers in the area.*

3.3.3.7 Submission No. KE-C8-226: JOHN KEENAN

Submission Summary:

Submission requests that the feasibility of providing a Cable Car overlooking Rossbeigh Beach and Dingle Bay be explored. It is stated that the County needs major tourist attractions and that cable cars are huge tourist attractions and should be included in the Kerry County Council's Tourism Strategy.

Response:

As is stated in Section 2.8 of the LAP, tourism objectives as set out in Chapter 10 of the KCDP 2022-2028 should be referred to when considering development proposals in this Plan area. A proposal for a cable car overlooking Rossbeigh would therefore be required to comply with the policies as contained in the development plan.

It should also be noted that the area referred to is designated as a visually sensitive area in the KCDP 2022-2028, and there are a number of NPWS designated sites in the area.

Recommendation:

No amendment proposed.

3.3.3.8 [Submission No. KE-C8-230: SUSTAINABLE TOURISM CONSULTANTS](#)

Submission Summary:

This submission covers the Skellig Region from a tourism perspective and includes the following towns, villages and small village settlements: Cahersiveen, Waterville, Baile an Sceilg, Chapelstown, Dun Geagain, Knightstown, Portmagee, An Cillín Liath, An Gleann, Caherdaniel, Castlecove, and Kells.

The submission welcomes Section 3.2.1.2 Vision and Strategy of the Draft Local Area Plan, and statements on climate change.

The submission makes a number of suggestions in relation to the proposals for Cahersiveen.

The submission concludes by listing Strategic Investment Priorities in the Skellig Coast area:

1. Road network – in particular the main Ring of Kerry road, but also creating improved access to attractions such as Derrynane House & Gardens, Kells House & Gardens, Valentia Lighthouse and the Skellig Ring Drive. Additional investment is also required to access important heritage sites “Over the water” at Leacanabuaile, Cahergal and blue flag beaches in the area.
2. Extend environmentally sustainable public transport and improve access to Skellig Region.
3. Further investment in Kerry Airport.
4. Tourism Product Development, including all-weather attractions, visitor servicing facilities, accommodation and additional business units for F&B, tour operators, etc.
5. Lighting and landscaping plans to be designed to maximize use of day and night. All public lighting in the Skellig Region, including Cahersiveen to comply with Dark Skies lighting requirements (KENMD-31).
6. Consideration should be given to introduce a tourism tax for day visitors on the Ring of Kerry. This would be consistent with other areas focused on sustainable development. The funding generated would be earmarked and invested in the areas that receive high numbers of day visitors to enable additional infrastructure to be developed to meet local requirements and encourage more overnight visitors.
7. Consideration should also be given to zone a craft quarter and dedicated market area with the masterplans for Cahersiveen Waterfront / Marina area (Ref: KENMD-CH-25).
8. Circular economy principles should be integrated into the wider LAP and additional recycling facilities within the Skellig Region would be welcomed, particularly in relation to the recycling of plastics.

Response:

The LAP acknowledges the importance of the tourism sector to the economy of the area. Section 2.8 of the LAP deals in detail with tourism. It is an aim of the LAP to build a sustainable tourism future that maximises and diversifies the tourism product to the highest standard particularly into non-traditional areas and extends the tourist season and ensuring that the tourism product is fully nurtured and enabled to realise its maximum potential.

It is an objective of the LAP, KENMD-28, to facilitate where appropriate the development of the projects listed in the Skellig Coast Visitor Experience Plan. It is also an objective of the LAP to work with all stakeholders and to promote the Fáilte Ireland Destination Tourism group/community plans and strategies.

In relation to issues raised in the submission regarding Cahersiveen, a retail core has been defined for Cahersiveen in the Draft LAP, this area is therefore the preferred area for retail development as it is the centre of the town. Appropriate retail development in other locations is not precluded. The LAP is supportive of public realm improvements in all areas, with Main Street being a priority.

A number of sites have been zoned for C5 Tourism and related uses in the town. It should also be noted that a hotel development is open for consideration or permitted in principle on all the M1, M2, M4 and R Residential zoned lands as well as the C5 Tourism and related zoned lands. Therefore, ample provision has been made in the LAP for hotel development and other tourist accommodation facilities should they be proposed.

Kerry County Council are committed to carrying out parking surveys in Cahersiveen to determine the need for additional parking.

Recommendation:

No amendment proposed.

3.4 Councillor Submissions

A number of items as part of these submissions pertain to site specific projects, these projects are better dealt with outside of the context of the Local Area Plan. A copy of these submissions has been sent to the relevant Kerry County Council Kenmare Municipal District staff for their attention. The summaries below relate to specific policies or objectives relevant to the LAP.

3.4.1 [Submission No. KE-C8-38:](#) CLLR. MICHAEL CAHILL**Submission Summary:**

This submission requests that there is an increase in the amount of land zoned residential in Killorglin

The submission requests that Uisce Éireann be urged to provide a Wastewater Treatment Plan in Beaufort and Cromane and are urged to increase the capacity of the Wastewater Treatment Plan in Glenbeigh for housing.

The submission requests that voluntary and social housing be prioritised in Killorglin and Cahersiveen.

The construction of a hotel in Killorglin should be facilitated, the park on the banks of the River Laune needs to be supported and a feasibility of a blueway from Killorglin to Loch Léin must be investigated.

Suggests that a Pilot Study be undertaken into the possibility of providing a Car Ferry to serve Cahersiveen/ Iveragh/South Kerry and Dingle/Corca Dhuibhne/West Kerry peninsulas.

This submission favours private wastewater treatment systems as an option to support development of tourist accommodation and clusters of housing as many settlements do not have a wastewater treatment plant or the plant is at capacity.

Response:

Killorglin

Lands that are currently zoned R1 in Killorglin are more than sufficient to meet Killorglin's housing needs as per the Core Strategy contained in the KCDP 2022-2028. To zone additional lands as requested for proposed residential use would exceed the Core Strategy of the County Plan. See also response/recommendation in Section 3.1.1 to the submission from the Office of the Planning Regulator.

Uisce Éireann

Chapter 13 of the KCDP 2022-2028: 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 where it is an objective, 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 also submission from Uisce Éireann in Section 3.1.13.

Social Housing

Kerry County Council is supportive of the provision of a variety of tenancy mixtures in the provision of housing. The KCDP 2022-2028 provides objective and policy support in this regard.

Hotel in Killorglin

Within the LAP an objective is included to provide support for a hotel, KENMD-KG-18.

Park on the banks of the River Laune

The LAP supports the development of a park located along the River Laune please refer to the following objectives have been proposed in the LAP: KENMD-KG-23, KENMD-KG-24, KENMD-KG-25

Car Ferry

Objective KENMD-65 is included in the LAP which provides specific support for what is requested.

Private Wastewater for tourist accommodations

The provision of wastewater for development is dealt with at application stage.

The KCDP 2022-2028 under Section 13.2.2.3 Communal Private Wastewater treatment plants sets out the criteria under which these systems may be acceptable and under which criteria they may be assessed against provides objective support for Communal Private Wastewater Treatment Plants under objective KCDP 13-17.

Private wastewater for cluster developments

The KCDP 2022-2028 sets out policies and objectives, Section 5.4, in relation to the provision of cluster developments with their own onsite waste water treatment systems, within specific settlements, including Beaufort and Chapeltown within the MD.

Recommendation:

No amendment proposed.

3.4.2 [Submission No. KE-C8-197: CLLR. NORMA MORIARTY](#)**Submission Summary:**

That the Council supports the development and strengthening of the Irish language as part of the Cathair Saidbhin Le Gaeilge initiatives.

Kenmare

LAP make provision and supports the development of assisted living accommodation for adults with intellectual disabilities.

Killorglin

Local outdoor sports clubs and organisations be facilitated with access onto The Laune and that all Blueway development be explored and objectives supporting same be expressly identified.

Portmagee

Requests that the local rowing club be assisted and supported in locating a club facility.

Ballinskelligs and The Glen

Requests that everything possible is done to assist with the provision of wastewater management by way of ICW's and an upgraded sewerage system to ensure housing can be delivered.

Caherdaniel-Derrynane-Castlecove

Requests that the community's efforts to provide an ICW continue to be supported and that all options be examined.

Dromod

Requests that the LAP supports the development of Dark Sky viewing points and infrastructure to ensure that the area can benefit from that designation.

Valentia

Requests that the Grotto at the Slate Quarry be protected and its social and cultural importance to the community be recognised in the LAP.

It is requested that the Council support the communities expressed option in relation to the ACA as outlined in the Draft Plan and just list the existing designations and protections as a means of supporting a potential UNESCO bid.

It is requested that an ICW at Chapelstown be supported and facilitated with a view to realising affordable housing for the area.

Requests that the pier at Renard be extended to ensure the future of the Ferry and as a support to the local economy.

MD Wide

That the LAP makes provision for the growing trade of mobile food and beverage outlets as well as service and amenity operators while balancing the activity with obligations to existing rate paying business operators through devising a proportional seasonal trader's scheme that is fair and supportive to all.

Response:Cahersiveen

It is not within the remit of the LAP to explicitly provide any of the improvements to public infrastructure but to provide the policy framework and objectives to support such improvements. In each individual chapter in Section 3 there are numerous objectives that support the provision of infrastructure for the MD area.

Irish language support exists within the LAP under the following objective for the support of the Irish language, please refer to KENMD-CH-9.

Kenmare

See response/recommendation in Section 3.2.2.11 to submission KE-C8-50.

Killorglin

Within the LAP there are objectives to support and encourage the improvement of recreational facilities for water activity as well as the supporting of the sustainable development of a Blueway on River Laune under the following objectives, KENMD-KG-16 and KENMD-KG-19 respectively.

Flood mitigation

There are policies and objectives in the KCDP 2022-2028, Chapter 11, specifically Section 11.4.2 that covers Coastal Erosion.

Zoned lands

Sufficient lands have been zoned within Waterville to achieve the housing targets contained within the Core Strategy table of the KCDP 2022-2028 as allocated for Waterville within the lifetime of this plan, see also response/recommendation in Section 3.1.1, submission from the Office of the Planning Regulator.

Rowing Club in Portmagee

The provision of recreational facilities is important to the vibrance and wellbeing of any community in this regard the following new objective should be included, support the sustainable development of water recreation facilities in the village of Portmagee at an appropriate location subject to environmental assessment.

Ballinskelligs and The Glen

There is an objective in the LAP to support the upgrade of wastewater treatment infrastructure in this area, KENMD-BG-4, facilitate and support the upgrade of existing wastewater treatment infrastructure in a timely manner to ensure the sustainable development of the area.

Caherdaniel-Derrynane-Castlecove

The areas of Caherdaniel Derrynane and Castlecove are included within Section 3 Small Village Settlements, as such general objectives apply across the settlements as regard this provision of infrastructure and improvements in these areas such as the following objectives, KENMD-SV-3, KENMD-SV-4, KENMD-SV-5, and KENMD-SV-7.

Dromod/Dark Skies

Objective support exists for the development of dark sky reserve in the KCDP 2022-2028 under Section 11.3.3.1 Kerry International Dark-Sky Reserve. Objectives KENMD-31, KENMD-32, KENMD-33 and KENMD-34 as contained in Section 2.8.3 Dark Skies & Astro-Tourism of the LAP are also of relevance.

Valentia Grotto/Slate Quarry

Additions to the record of protected structures forms part of the Kerry County Development Plan Review Process.

Chapelstown

The Council are aware of the capacity issues around the provision of wastewater for Chapelstown and the restriction this may place on the provision of residential development in the area. The Council will continue to liaise with Uisce Eireann in this regard, there is objective support within the LAP to facilitate the provision of wastewater infrastructure, please refer to objective KENMD-CP-4.

ACA's

See response and recommendation in Section 3.1.11 to the submission from the Dept. of Housing, Local Government & Heritage and also the response/recommendation in Section 3.3.1.3.

Recommendation:

It is recommended to include a new objective for Portmagee (Overall Objectives) as follows;

Support the sustainable development of water recreation facilities at an appropriate location in the village of Portmagee subject to environmental assessment.

3.4.3 Submission No. KE-C8-38: CLLR. PATRICK O'CONNOR-SCARTEEN

Submission Summary:

It is stated that additional parking is required for the town. The submission states that it is hoped that the field adjacent to the Convent will materialise and that a foot bridge and path connecting with the schools and a car park will be put in place.

Walkways/Greenway

It is stated that Kenmare needs more walkways and connectivity free from traffic especially from the Peninsula Lands to the Town, and along the shoreline.

The submission states that it should be a priority in Kerry's Greenway strategy to have connectivity with the South Kerry Greenway and especially with Killarney. It is stated that people should be able to cycle and walk from Kenmare Town Centre to Killarney Town centre. Improvements to the Beara Way and Kerry way would be welcomed.

Enterprise

The submission states that there is not enough focus on alternative employment and Enterprise in the LAP. That a digital hub and enterprise units in or near the town centre are needed.

Arts & Culture

The submission states that an Artist's Hub is needed for the Town and requests that the Council source a suitable building. It is stated that such a building could also have a museum for the famous Kenmare Lace.

It is stated that The Carnegie Arts Centre needs more support from Kerry County Council and from the Dept of Arts.

Dereliction & Vacancy

The submission states that the laws pertaining to getting identified derelict buildings back into use should be used fully.

Housing

Submission states that diverse housing options should be available: 1 & 2 bedroom units for older persons near the town centre, designated housing for people with disabilities to support independence and affordable 3/4 bedroom units for families.

Water

The submission states that it is essential that an extra water is sourced for a growing population.

Convent building and lands

The submission states that it is hoped that the convent building and lands are acquired and can be used for community purposes including a car park, walkway along the river, and picnic areas.

Response:

Enterprise

See response in Section 3.2.2.29 to Submission No. KE-C8-165.

Arts & Culture

See response in Section 3.2.2.29 to Submission No. KE-C8-165.

Dereliction & Vacancy

It is a role of the Local Authority to investigate instances of dereliction and vacancy throughout the county, there have been various national schemes to incentivise the reutilisation of vacant and derelict properties. These schemes and the enforcement of vacancy and dereliction is dealt with by the councils dedicated vacant homes officer.

Town Renewal

See response in Section 3.2.2.25 to Submission No. KE-C8-120.

Housing

See response in Section 3.2.2.1 to Submission No. KE-C8-3.

Water

See response in Section 3.4.1 to submission from Cllr. Michael Cahill.

Flood Relief Scheme

Kerry County Council within their capacity as the relevant local authority for Kenmare have been and will continue to liaise and support the OPW and any other relevant authorities to progress the Kenmare flood relief scheme, objective support exists within the LAP please refer to objective, KENMD-KE-28.

Convent building and lands

The LAP includes for the zoned lands at the convent site for the provision of a car park this forms part of the improved traffic management measures set out in the LAP with the following objective support subject to environmental assessment, please refer to objective KENMD-KE-31.

Recommendation:

No amendment proposed.

4.0 Chief Executive Recommendations:

It is recommended that the Draft Kenmare Municipal District Local Area Plan 2023-2029 be **amended** as follows:
(Additional text is highlighted in *italics* with deletions in ~~strike through~~)

4.1 Section 1 Amendments

4.1.1 Amendment 1

It is recommended to include a new section, Implementation & Monitoring, in Section 1 as follows;

Implementation & Monitoring

The Plan sets out the Council's vision and strategy for the Municipal District of Kenmare, including specific policy and objectives to provide a framework for the sustainable development of the Municipal District over the period 2023-2029. Regular monitoring of the progress made in relation to ensuring the effective delivery of the objectives set out in the Plan will take place. The implementation of the Local Area Plan requires the cooperation and participation of all stakeholders. Coordination between other key departments in the Local Authority will be critical in ensuring that those objectives relating to issues such as roads, housing and community development are achieved.

4.2 Section 2 Amendments

4.2.2 Amendment 2

It is recommended to include a new objective in Section 2.11 (Connectivity Objectives) as follows;

Ensure new roads infrastructure is based on an objective evidence-base, such as through the Local Transport and Traffic Management Plans, or otherwise, including demonstration of consistency with current national transport policy.

It is recommended to amend objective KENMD-59 as follows;

Facilitate the carrying out of the works stated in the 'Schedule of MD Works Plan' for the Kenmare MD which are compatible with environmental protection objectives for the area and with the National Sustainable Mobility Policy (2022), the National Investment Framework for Transport in Ireland, or subsequent policy documents.

It is recommended to amend the text of Section 2.11.1.2.1 as follows;

The council will facilitate the sustainable development of greenways & cycleways *in compliance with the Cycle Design Manual (2023).*

4.2.3 Amendment 3

It is recommended to include a new objective in Section 2.9.2 (Land Use & Flood Risk Management Objectives) as follows;

Ensure that minor proposals for development, (e.g. small extensions to existing houses or changes of use), in areas at moderate to high risk of flooding should be assessed in accordance with Section 5.28 of the Guidelines, incorporating the additional guidance in Planning Circular PL2/2014.

4.2.4 Amendment 4

It is recommended that the LAP refer to the "*Transatlantic Cable Ensemble*" as opposed to "Valentia Cable Sites". This reference will be amended throughout the LAP.

It is recommended to amend objective KENMD-25 as follows;

Support the designation of the ~~Valentia Cable Sites~~ *Transatlantic Cable Ensemble* as an UNESCO-World Heritage Site.

It is recommended to amend objective KENMD-26 as follows;

The Department supports the ambition to support the conservation and presentation of the key cable sites at the old Slate Yard and 'First Message' & 'Telegraph Field' sites in accordance with ~~Department of Culture, Heritage and Gaeltacht and UNESCO guidance~~ *the Guidance and Toolkit for Impact Assessments in a World Heritage Context issued by the World Heritage Centre and ICOMOS.*

It is recommended to amend the text of Section 2.6.2.3 as follows;

Funding has been awarded to the ~~Valentia Trans-Atlantic Cable Station~~ *Transatlantic Cable Ensemble* as part of the Rural Regeneration and Development Fund. This project will ~~restore~~ *conserve* the Valentia Trans-Atlantic Cable Station.

It is recommended that the following text be added in relation to the Telegraph Field in Section 2.6.2.3 as follows;

The Telegraph field at Foilhommerum Bay is where a temporary cable station was constructed when the first successful sustainable cable connection was made in 1866, albeit only in operation for two years.

It is recommended to amend and include the following text in Section 2.6.2.4.2 as follows;

The Plan area contains the UNESCO World Heritage Site of Sceilg Mhichíl ~~and Staigue Fort, which is one of three monuments in the county included in the Western Stone Forts nomination on Ireland's 'Tentative Listing'~~. *County Kerry will be unique in Ireland in having potentially two World Heritage Properties situated within sight of each other. it is critical that the management, conservation and presentation of these two properties complement each other. and that this is reflected in the LAP. It is the policy of the Council to support the Sceilg Mhichíl World Heritage Property Management Plan.*

It is recommended to include a new objective in Section 2.6.2 (Built Heritage Objectives) as follows;

Support the Sceilg Mhichíl World Heritage Property Management Plan.

4.2.5 Amendment 5

It is recommended to include a new section, Climate Action, in Section 2.9 as follows;

Climate Action

In the context of this LAP the integration of climate action policy aligns with the vision, strategic objectives and actions outlined in Kerry County Council's Local Authority Climate Action Plan (LACAP) to be adopted in Q1 of 2024. The LACAP recognises in the context of land use plans,

the integration of spatial, transport and energy planning is fundamental to achieving decarbonisation, particularly in the challenging sectors of heating and transport.

Decarbonisation of heating in the built environment across the residential and non-residential sectors is a key challenge for climate action in the context of this LAP. While the Council has taken a proactive approach in the promotion and implementation of energy efficiency initiatives in its own building stock to date, it has challenging targets to achieve public sector targets (a 50% improvement in energy efficiency and 51% cut in emissions) by 2030. Equally, reaching targets for decarbonisation in the private sector will be challenging. While national building regulations will oversee compliance with evolving European energy legislation in existing and new (to NEZB standards) buildings - the LAP can indirectly support initiatives that seek to decarbonise the heating sector at a local level. Here, consolidated growth principles can again facilitate a more cost-effective roll-out of retro-fitting projects at larger spatial scale; and facilitate investigations into potential communal heating schemes, such as district heating schemes, and/or other potential renewable heat sources. The LAP also supports the energy user of the future - the "self" or "pro-consumer" - essentially where energy is consumed close to where it is produced. Many of these self-consumer energy projects are exempted development e.g. installation of solar PV panels. However, the LAP supports community-based generation in line with policy and objectives outlined Chapter 12 of the KCDDP 2022-2028 and evolving micro-generation and export to grid legislation.

Regarding the decarbonisation of transport, consolidated growth and the support of the avoid-shift-improve model in the LAP will be key to achieving ambitious transport emissions reductions. This LAP therefore strongly supports "avoid" by ensuring via consolidated growth/high density living in our settlements people reside close to where they work, go to school etc; "shift" by ensuring people can, via, active travel safely walk, cycle or use public transport and by "improve" ensure the Plan supports the roll out of alternative fuels such as EV charging infrastructure.

It is recommended to amend the text of Section 2.3.1 as follows;

It is important to acknowledge that the redevelopment of brownfield sites is inherently more sustainable than the development of greenfield sites and should be encouraged. *This principle of consolidated growth is in line with Climate Action Policy as outlined in the Draft Local Authority Climate Action Plan 2024-2029. In the context of this LAP, consolidated growth allows for the provision of more sustainable forms of municipal services such as the decarbonisation of heat at scale. The potential e.g. of district heating schemes or large scale retro-fitting projects that electrify heating at scale, is more economically feasible in consolidated settlements.* When discussing redevelopment proposals, it is important to address the potential of these sites for economic development; employment creation *and supporting climate action through decarbonisation of two significant sectors – heat and transport.*

It is recommended to amend the text of Section 2.3.2 as follows:

The Briefs establish the broad development principles for the areas and set out the general distribution of land uses, circulation systems and key access points. The Briefs also indicate how future land uses should integrate with surrounding development and provide for the future phasing of development. *In addition, the brief incorporates the need for future developments to be aligned with climate action policy particularly evolving regulations for Net Zero Emissions Buildings (NZEB) as further EU Directives on energy are transposed.*

The Briefs seek to demonstrate, whilst having regard to the existing site context and character, the following:

- Overall layout and distribution of uses and open space on the subject lands;
- *That building design choices will be climate proofed and evaluated in terms of energy performance, energy management, carbon emissions and future operational costs;*
- Principal road infrastructure and access;
- Principal pedestrian and cycle routes and access particularly as they relate to mitigating emissions from the transport sector;
- Improvements to existing road infrastructure; and
- Incorporation of existing features of biodiversity value (e.g hedgerows, trees, watercourses) & enhancement of biodiversity.

The delivery of the above infrastructure/principles are set out in the accompanying maps. The proposals contained in these Briefs have regard to the policies, objectives and standards contained in the Kenmare MD LAP and KCDP. The Briefs will be used as a tool for the co-ordinated delivery of development over the coming years *underpinned by climate action policy particularly as it relates to reducing emissions from heating and transport*. It will ensure that development is integrated and designed appropriately in accordance with the proper planning and sustainable development of the area.

4.2.6 Amendment 6

It is recommended that Table 2.7 be replaced with the following updated table:

Settlement Status	Settlement	WWTP (Headroom)	Water Supply
Regional Town	Cahersiveen		
	Kenmare	*	
	Killorglin		
District Town	Sneem	**	
	Waterville		
Villages	Baile an Sceilg		
	Beaufort	#	
	Chapelstown	#	
	Dún Géagáin		
	Glenbeigh	***	
	Kilgarvan		
	Knightstown	##	
	Portmagee		

* the upgrade of this WWTP is anticipated to be completed in December 2025
 # no public WWTP present

** WWPS Upgrade programme and is currently at detailed design stage
 *** part of the STVGP, project is at Stage 2 – Preliminary Business Case
 ## project to upgrade WWTP being advanced under the STVGP

Key	Capacity available	Potential capacity	No capacity capital investment is required
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4.2.7 Amendment 7

It is recommended to amend Objective KENMD-58 as follows;

Prepare Local Transport & Traffic Management Plans for the settlements as appropriate, *following the principles of the ABTA approach as set out by the National Transport Authority and Transport Infrastructure Ireland.*

It is recommended to include a new objective in Section 2.11 (Connectivity Objectives) as follows;

Facilitate the implementation of the Connecting Ireland and Local Link Rural Transport programmes within the MD area, by facilitating the operation of public transport services between and within settlements and maximising walking accessibility to services through development consolidation within settlements and the enhancement of local connectivity.

4.2.8 Amendment 8

It is recommended to amend Objective KENMD-28 as follows;

Facilitate where appropriate the development of projects listed in the 'Skellig Coast Visitor Experience Development Plan' *and the 'West Cork and Kenmare Destination and Experience Development Plan'.*

4.2.9 Amendment 9

It is recommended to amend the text of Section 2.6.2.3 as follows;

For 100 years, the Valentia Cable Stations ~~was~~ *were* the hub of transatlantic communication. The Cable Station and slate yard in Knightstown, *and the Telegraph Field in Foilhommerum,* are of enormous national and international heritage value in terms of their industrial archaeology, history, and contribution to mankind's technological progress.

4.2.10 Amendment 10

It is recommended to omit Figure 2.9: Area 2 Telegraph Field H & CSA.

4.2.11 Amendment 11

It is recommended to amend Objective KENMD-19 as follows;

Support Údarás na Gaeltachta & Coiste Forbartha na Sceilge in relation to projects for the provision of sustainable accommodation projects *within the Gaeltacht settlements of Baile an Sceilg, Dún Géagáin, An Gleann and An Chillín Liath, and other community-led affordable housing projects in Gaeltacht Uíbh Ráthaigh.*

It is recommended to amend Objective KENMD-14 as follows;

Facilitate and support Language Plans - Brí Uíbh Ráthaigh–Plean Teanga Chiarraí Theas 2019-2026, (Language Plan for South Kerry) and the language plan for Cahersiveen, a designated Baile Seirbhíse Gaeltachta, *and Nascadh Uíbh Ráthaigh*, to achieve their target of increasing the number of daily Irish Speakers.

It is recommended to amend the text of Section 2.6.1.2 as follows;

2.6.1.2 ~~Uíbh Ráthach Task Force Tascfhórsa Uíbh Ráthaigh~~

~~The Uíbh Ráthach Gaeltacht Interagency Taskforce published an integrated cross sectoral regeneration plan for the region in July 2019 with the focus on employment and quality of life. The plan seeks to create 145 full-time jobs and a 3% increase in population with a focus on developing innovations in alternative farm enterprises, the development of a digital hub and an increase in tourist visitors. The report also targets a 5% increase in daily Irish speakers and the reestablishment of an Irish language summer college, in order to combat falling levels of spoken Irish in the area. This Plan supports the ambitions of the Uíbh Ráthach Task Force and any reports/plans/actions that they promote in keeping with the principles of proper planning and sustainable development~~

The Action Plan for Rural Development (2017) proposed that a Task Force should be established for the Gaeltacht area of Uíbh Ráthach to address issues pertaining to population structural deficiencies. The development of an integrated, cross sectoral plan for the Uíbh Ráthach Gaeltacht to address the social and economic needs of the community was proposed and an ambitious regeneration plan for the region was launched in July 2019. The areas of focus in that plan centred on employment and quality of life improvements as facilitators of population growth and restructuring. A second action plan for the period 2023-2026 has been adopted by the Tascfhórsa, building upon the steps taken in phase one and focusing on critical enablers of economic growth and development as well as building further foundations for key quality of life initiatives in the area. This LAP supports the ambitions of the Uíbh Ráthach Task Force.

4.3 Section 3 Amendments

4.3.1 Amendment 12

It is recommended to amend the text of Section 3.1.2.2 as follows:

- Residential development on R4 (Strategic Residential Reserve) lands will be permitted only on completion of 50% **80%** of the R1 (New/Proposed Residential) zoned lands subject to the provision of adequate infrastructure.
- ~~• Where no lands have been identified as R1 or R4 in a particular settlement, residential development will only be considered subject to consideration of the KCDP Core Strategy and the provision of adequate water infrastructure.~~
- *Ensure that residential development on R4 (Strategic Residential Reserve) lands in Villages complies with the Core Strategy and is subject to the provision of adequate water infrastructure.*
- *In Small Village Settlements (where no lands have been identified as R1 or R4), cluster type residential development will only be considered subject to the provision of adequate water infrastructure as per Section 3.5.2 of this Plan.*

It is recommended to amend Objective KENMD-76 as follows;

Prohibit development on lands zoned R4 (strategic residential reserve) until 50% 80% of the R1 (new/proposed residential zoned) lands have been developed to the satisfaction of the Planning Authority and subject to the provision of adequate infrastructure.

It is recommended to include a new objective in Section 3.1.2 (Residential Objectives) as follows;

Ensure residential development on R4 (Strategic Residential Reserve) lands in Villages shall comply with the provisions of the Core Strategy and is subject to the provision of adequate water infrastructure.

4.3.2 Amendment 13

It is recommended to amend Objective KENMD-70 as follows;

Ensure that all new development shall maintain the integrity of the surrounding rural landscape and rural character of the settlement while ensuring that future development supports the existing role and function of the village as a small local focal point for its surrounding rural community *and that it supports the aim to increase the number of daily Irish speakers in the area.*

4.4 Cahersiveen Amendments

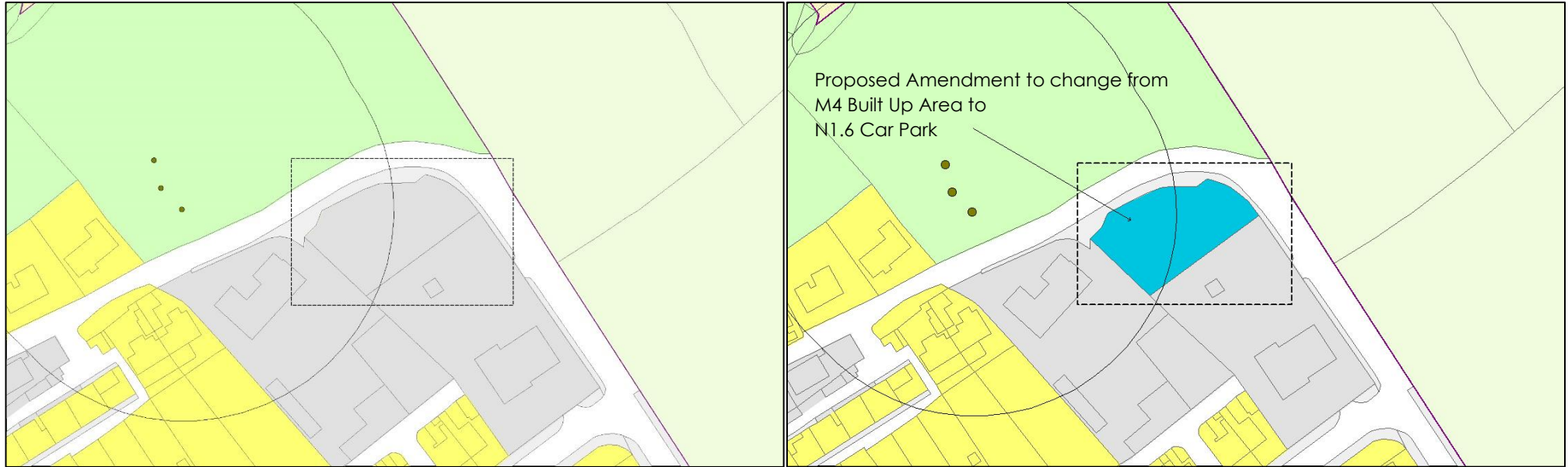
4.4.1 Amendment 14

It is recommended to amend the text of Section 3.2.1.5.3 as follows;

to limit development to only water-compatible development within Flood Zone A and water compatible/less vulnerable development in Flood Zone B, unless proposals within these sites first pass a flood risk management justification test, to the satisfaction of the Planning Authority.

4.4.2 Amendment 15

It is recommended to amend the Cahersiveen zoning map from M4 Built Up Area to N1.6 Car Parking as follows;

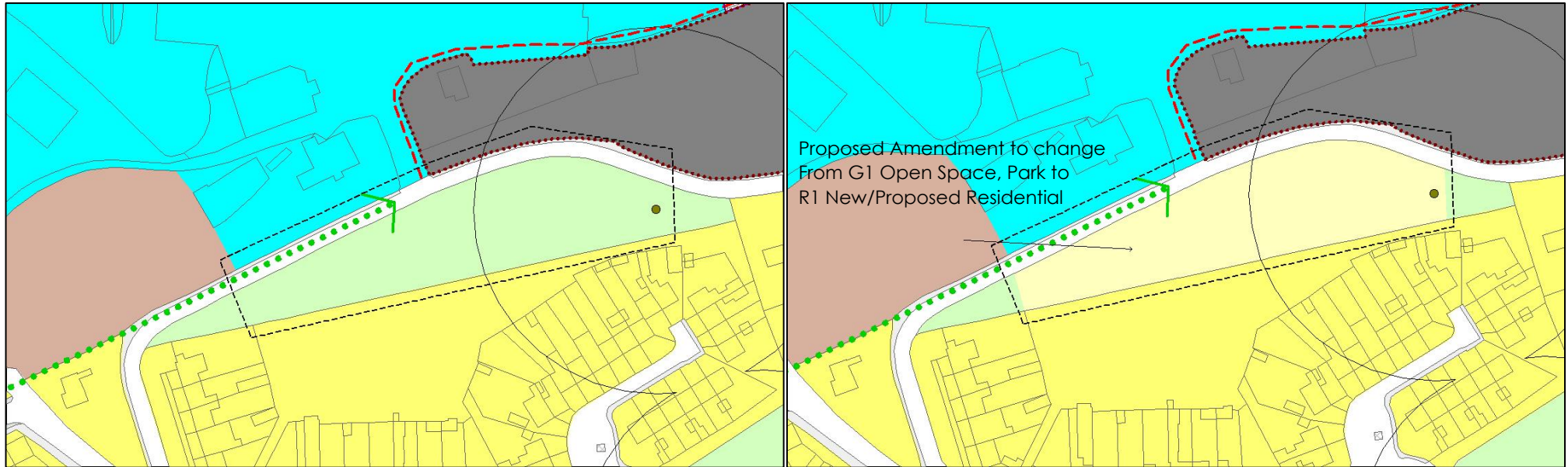


Draft LAP

Proposed Amendment

4.4.3 Amendment 16

It is recommended to amend the Cahersiveen zoning map from G1 Open Space, Park to R1 New/Proposed Residential as follows;



Draft LAP

Proposed Amendment

ID	Zoning	Road Access	Footpaths	Public Lighting	Foul/storm Sewer	Water Supply	Tier	Area (ha)	Estimated Density Units p/ha	Potential Yield
	R1	✓	✓	✓	✓	✓	1	0.36	20-35	7-13

Settlement Capacity Audit - Highlighted Site

It is recommended to include a new section, Residential Lands on Marina Road, in Section 3.2.1.5 (Town Centre) as follows:

3.2.1.5.6 Residential Lands on Marina Road

This site is located between Marina Road and Marian Place/St. Joseph's Terrace. The site together with the adjoining lands to the south are strategically located in close proximity to the town centre, the marina and the proposed South Kerry Greenway. The site which is located on a rocky outcrop elevated over the waterfront can be considered a landmark one. Potentially, the site presents an opportunity to provide for a mixture of residential units but also for tourism/recreational use that could serve the needs of the Greenway users or visitors to the Dark Sky Reserve in a sustainable manner and within walking distance of the town centre.

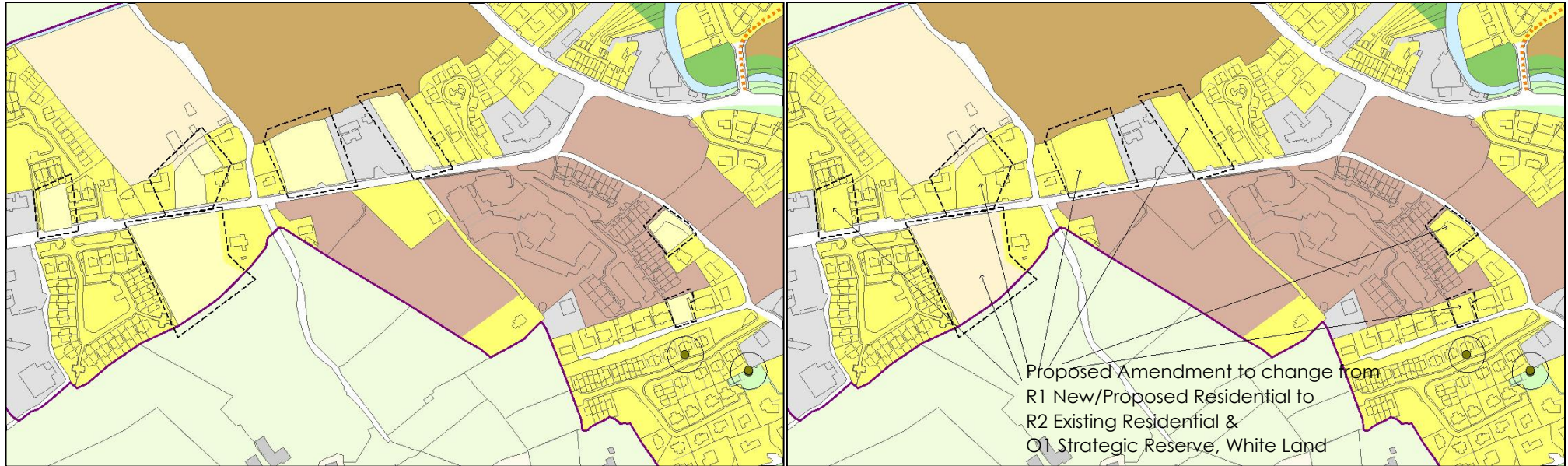
There are development constraints associated with the site, which should be addressed as part of any planning application, including the following.

- *Topography:* This is a prominent site, which is elevated above and overlooking the waterfront. The site along Marina Road is mainly dominated by a steep rockface. Any proposal for these lands should be designed to a high architectural standard. A detailed design statement is required outlining how the proposal would both provide a local landmark development and satisfactorily integrate into the townscape/landscape.
- *Amenities:* Development proposals should seek to improve the amenities of the area and should not unduly impact existing residential amenities.
- *Access:* Limited vehicular access is currently available via Marian Place and pedestrian connectivity onto Marina Road. Detailed proposals should be provided for access and servicing arrangements. This may involve localised road widening requirements. Pre-planning consultation with the Area Engineer is also advised.
- *Archaeology:* The eastern end of the site contains a monument (souterrain) listed on the Record of Monuments and Places. A buffer zone between the monument and a development proposal may be required. Any such buffer should be satisfactorily incorporated into the overall development proposal.
- *Biodiversity:* This site contains semi-natural vegetation likely to be of some ecological interest. Development proposals shall be accompanied by an ecological impact assessment report and shall incorporate biodiversity considerations into the project design.

4.5. Kenmare Amendments

4.5.1 Amendment 17

It is recommended to amend the Kenmare zoning map from R1 New/Proposed Residential to R2 Existing Residential and O1 Strategic Reserve, White Land as follows;



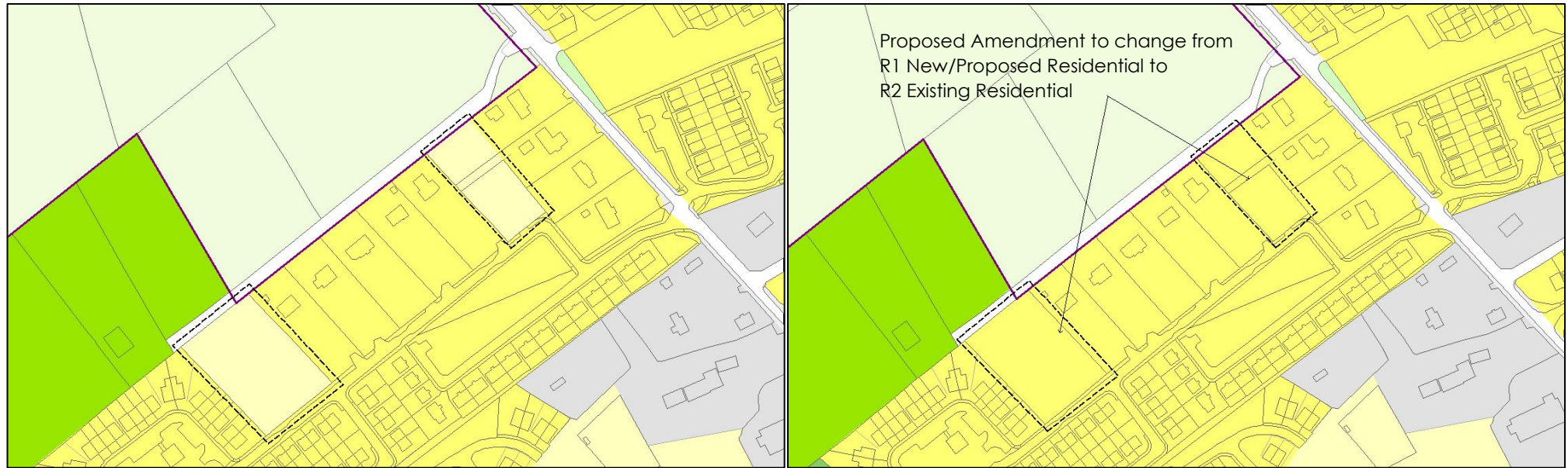
Draft LAP

Proposed Amendment

ID	Zoning	Road Access	Footpaths	Public Lighting	Foul/storm Sewer	Water Supply	Tier	Area (ha)	Estimated Density Units p/ha	Potential Yield
KE-1	R1	✓	✓	✓	✓	✓	1	0.15	15-20	2-3
KE-2	R1	✓	✓	✓	✓	✓	1	0.88	15-20	13-18
KE-3	R1	✓	✓	✓	✓	✓	1	0.23	15-20	3-5
KE-4	R1	✓	✓	✓	✓	✓	1	0.46	15-20	7-9
KE-5	R1	✓	✓	✓	✓	✓	1	0.29	15-20	4-6
KE-6	R1	✓	✓	✓	✓	✓	1	0.13	15-20	2-3
	R1	✓	✓	✓	✓	✓	1	0.06	15-20	1

Settlement Capacity Audit - Highlighted Sites

It is recommended to amend the Kenmare zoning map from R1 New/Proposed Residential to R2 Existing Residential as follows;



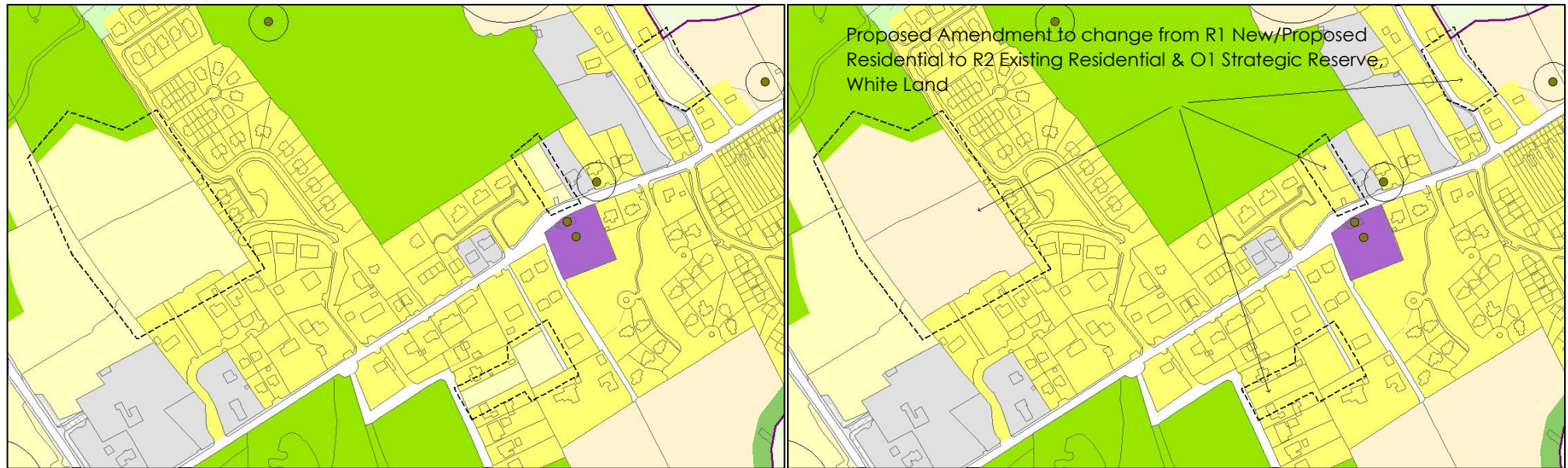
Draft LAP

Proposed Amendment

ID	Zoning	Road Access	Footpaths	Public Lighting	Foul/storm Sewer	Water Supply	Tier	Area (ha)	Estimated Density Units p/ha	Potential Yield
KE-8	R1	✓	✓	✓	✓	✓	1	0.46	15-20	7-9
KE-9	R1	✓	✓	✓	✓	✓	1	0.28	15-20	4-6

Settlement Capacity Audit - Highlighted Sites

It is recommended to amend the Kenmare zoning map from R1 New/Proposed Residential to R2 Existing Residential and O1 Strategic Reserve, White Land as follows;



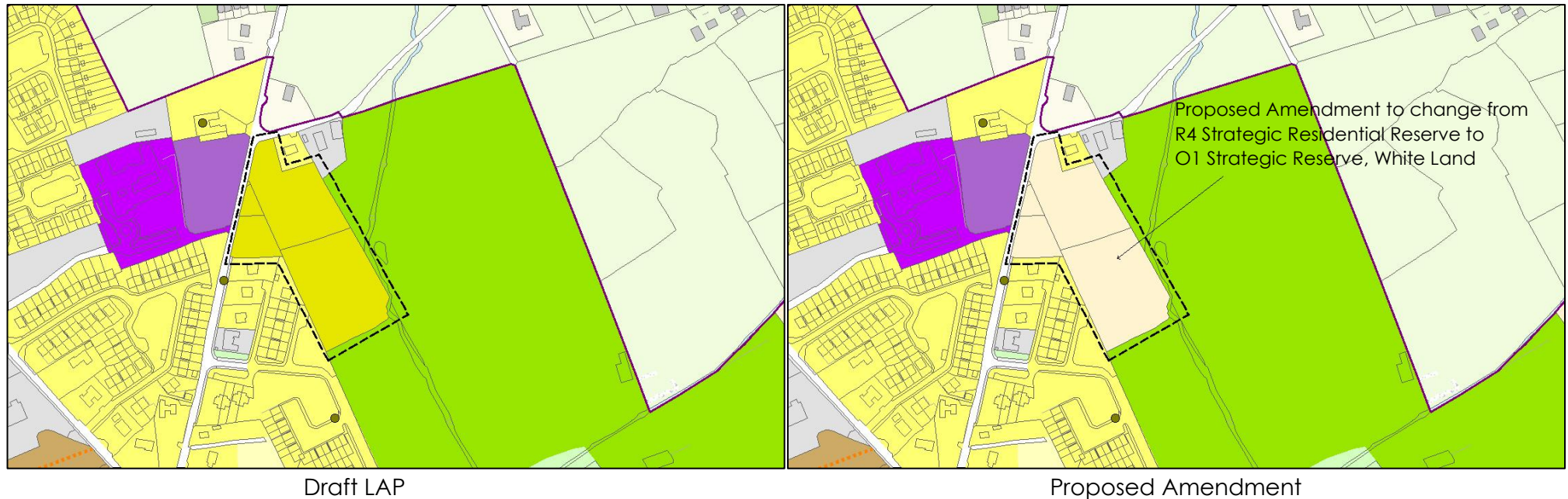
Draft LAP

Proposed Amendment

ID	Zoning	Road Access	Footpaths	Public Lighting	Foul/storm Sewer	Water Supply	Tier	Area (ha)	Estimated Density Units p/ha	Potential Yield
KE-13	R1	✓	✓	✓	✓	✓	1	4.71 2.21	20-35	94-165 44-77
KE-14	R1	✓	✓	✓	✓	✓	1	0.31	15-20	5-6
KE-15	R1	✓	✓	✓	✓	✓	1	0.13	15-20	2-3
KE-16	R1	✓	✓	✓	✓	✓	1	0.18	15-20	3-4

Settlement Capacity Audit - Highlighted Sites

It is recommended to amend the Kenmare zoning map from R4 Strategic Residential Reserve to O1 Strategic Reserve, White Land as follows;



4.5.2 Amendment 18

It is recommended to include the following text in Section 3.2.2.7.3 as follows;

The development of lands adjoining the River Finnihy including lands adjoining the tidal waters downstream of Cromwell bridge will be subject to project level environmental assessment and be required to take into consideration the requirements of the Habitats Directive, Departmental flood risk management guidelines and Inland Fisheries Ireland's planning guidelines on urban watercourses, as appropriate.

4.5.3 Amendment 19

It is recommended to include a new objective in Section 3.2.2.6 (Community Facilities Objectives) as follows;

Support the development of a community centre at an appropriate location within the town of Kenmare.

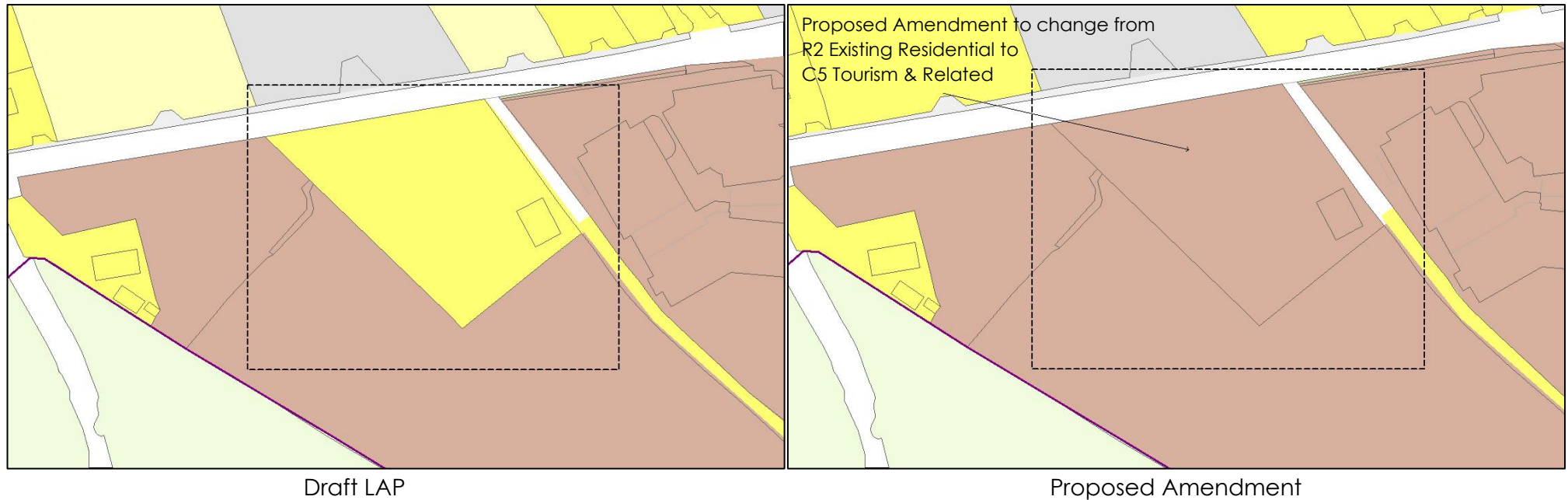
4.5.4 Amendment 20

It is recommended to include a new objective in Section 3.2.2.9 (Recreation & Amenities Objectives) as follows;

Seek to improve pedestrian connectivity between the Peninsula Lands looped walk and the town centre in a sustainable manner in consultation and engagement with the local community and stakeholders.

4.5.5 Amendment 21

It is recommended to amend the Kenmare zoning map from R2 Existing Residential to C5 Tourism & Related as follows;



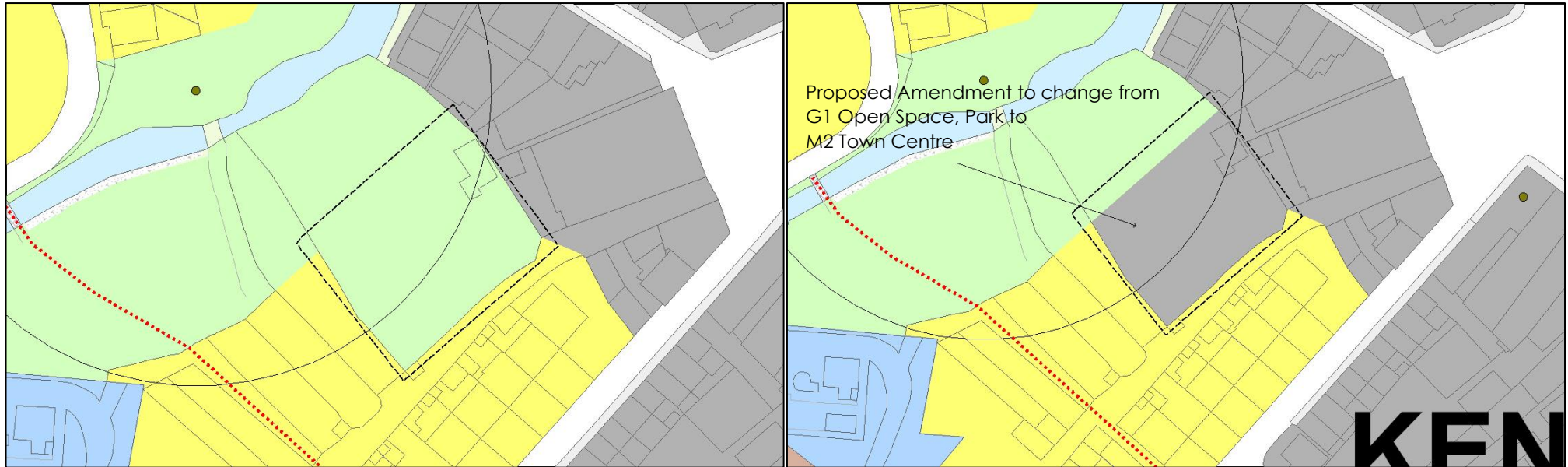
4.5.6 Amendment 22

It is recommended to include a new objective in Section 3.2.2.9 (Recreation & Amenities Objectives) as follows;

Support the sustainable development of Maritime and River related recreational facilities at an appropriate location or locations within the town of Kenmare.

4.5.7 Amendment 23

It is recommended to amend the Kenmare zoning map from G1 Open Space, Park to M2 Town Centre as follows;



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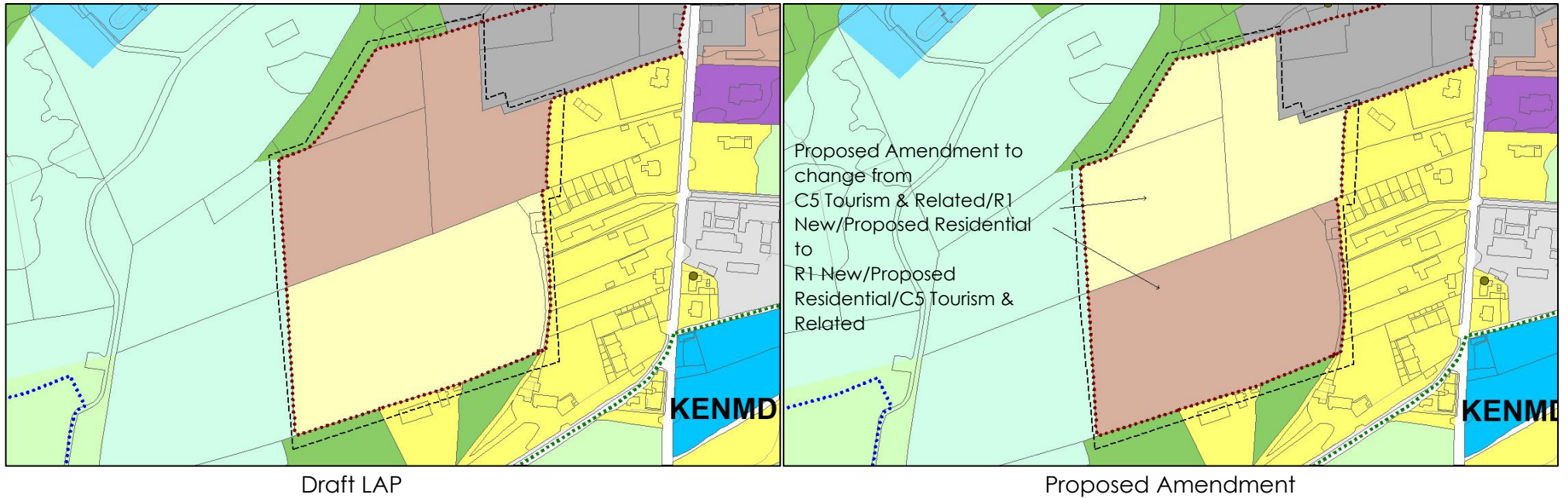
Proposed Amendment

ID	Zoning	Road Access	Footpaths	Public Lighting	Foul/storm Sewer	Water Supply	Tier	Area (ha)	Estimated Density Units p/ha	Potential Yield
	M2	✓	✓	✓	✓	✓	1	0.11	30-40	3-4

Settlement Capacity Audit - Highlighted Site

4.5.7 Amendment 24

It is recommended to amend the Kenmare zoning map from C5 Tourism & Related/R1 New/Proposed Residential to R1 New/Proposed Residential/C5 Tourism & Related as follows;



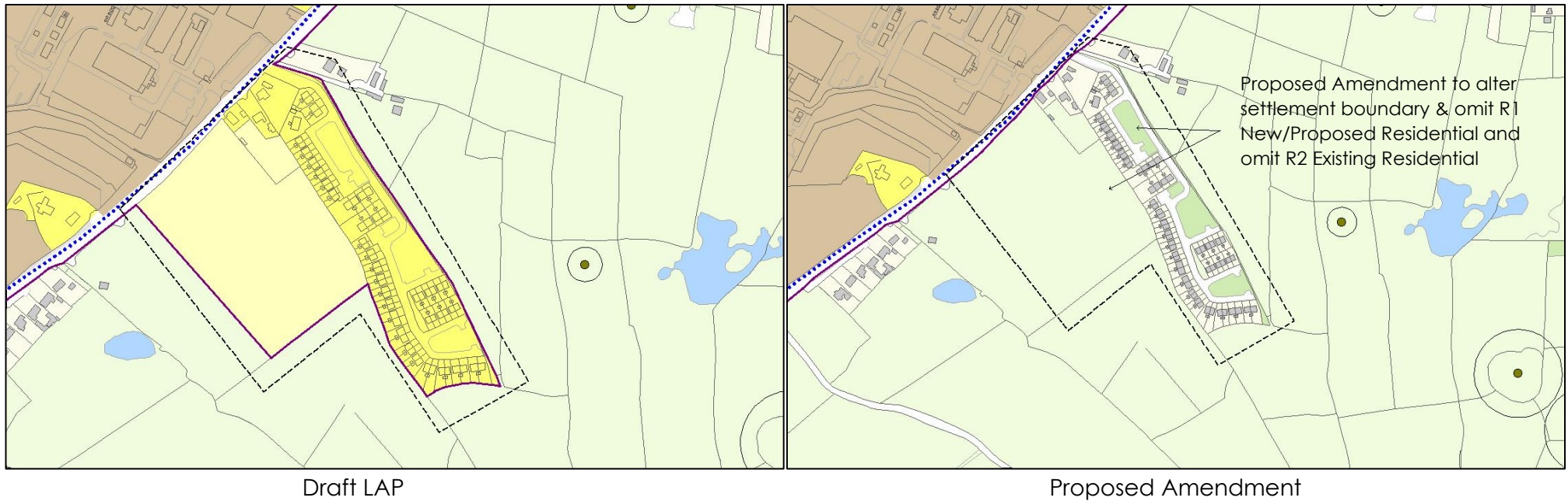
ID	Zoning	Road Access	Footpaths	Public Lighting	Foul/storm Sewer	Water Supply	Tier	Area (ha)	Estimated Density Units p/ha	Potential Yield
KE-17	R1	✓	✓	✓	✓	✓	1	2.68 2.69	20-35	52-91 54-94

Settlement Capacity Audit - Highlighted Site

4.6 Killorglin Amendments

4.6.1 Amendment 25

It is recommended to amend the Killorglin zoning map from R1 New/Proposed Residential/R2 Existing Residential to omit these areas from the settlement as follows;



ID	Zoning	Road Access	Footpaths	Public Lighting	Foul/storm Sewer	Water Supply	Tier	Area (ha)	Estimated Density Units p/ha	Potential Yield
KG-8	R1	✓	✓	✓	✓	✓	1	3.97	15-20	80

Settlement Capacity Audit - Highlighted Site

It is recommended to amend the Killorglin zoning map from R1 New/Proposed Residential and R4 Strategic Residential Reserve to R4 Strategic Residential Reserve and alter the settlement boundary as follows;



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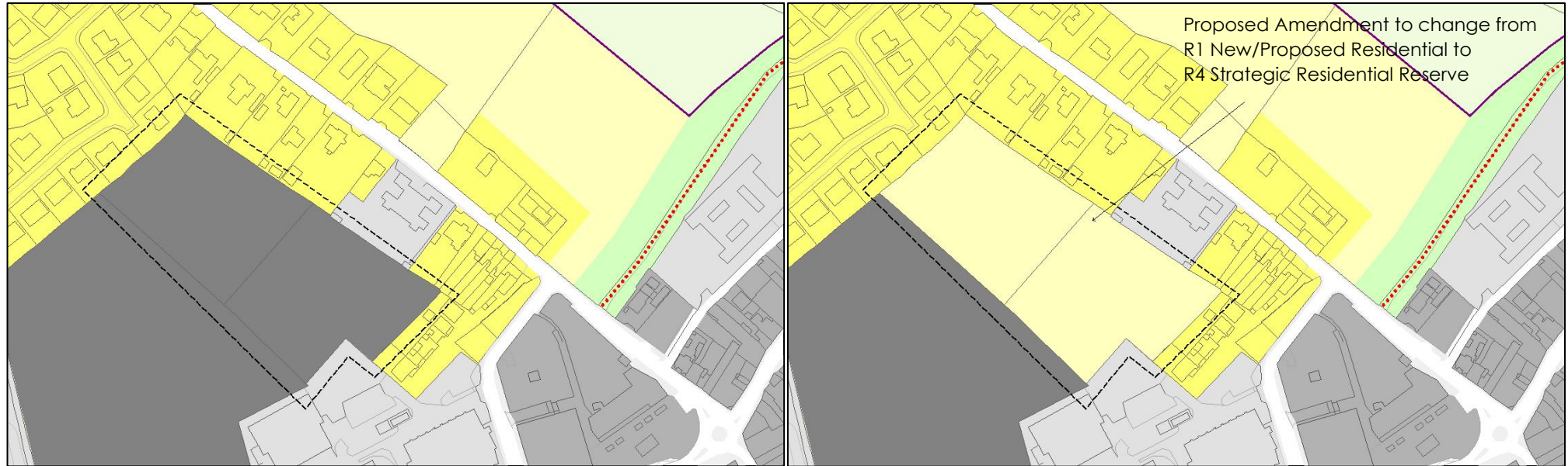
Proposed Amendment

ID	Zoning	Road Access	Footpaths	Public Lighting	Foul/storm Sewer	Water Supply	Tier	Area (ha)	Estimated Density Units p/ha	Potential Yield
KG-6	R1 R4	✓	✓	✓	✓	✓	1	3.44	15-20	52-69 *
KG-9	R4	✓	✓	✓	✓	✓	2	2.17	15-20	*

Settlement Capacity Audit – Highlighted Sites

4.6.2 Amendment 26

It is recommended to amend the Killorglin zoning map from M1 Mixed Use to R1 New/Proposed Residential as follows;



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Proposed Amendment

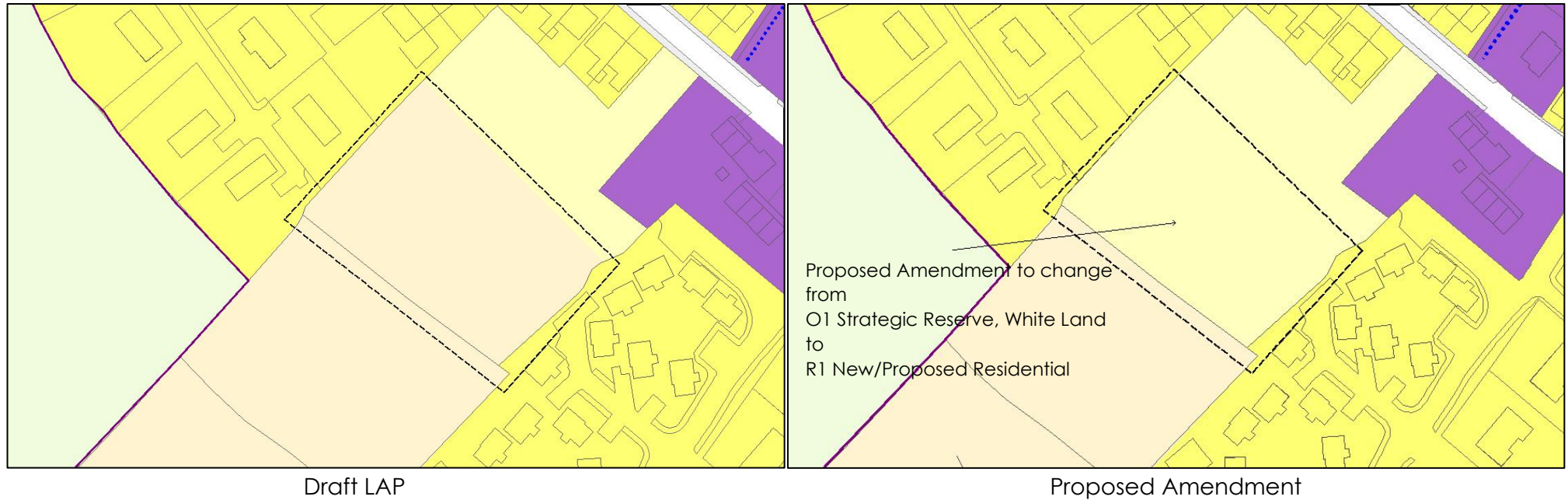
ID	Zoning	Road Access	Footpaths	Public Lighting	Foul/storm Sewer	Water Supply	Tier	Area (ha)	Estimated Density Units p/ha	Potential Yield
KG-10a	R1	✓	✓	✓	✓	✓	1	1.59	30-40	32-56
KG-10b	M1	✓	✓	✓	✓	✓	1	4.14 2.55	30-40	124-166 77-102

Settlement Capacity Audit – Highlighted Site

4.7 Sneem Amendments

4.7.1 Amendment 27

It is recommended to amend the Sneem zoning map from O1 Strategic Reserve, White Land to R1 New/Proposed Residential as follows;

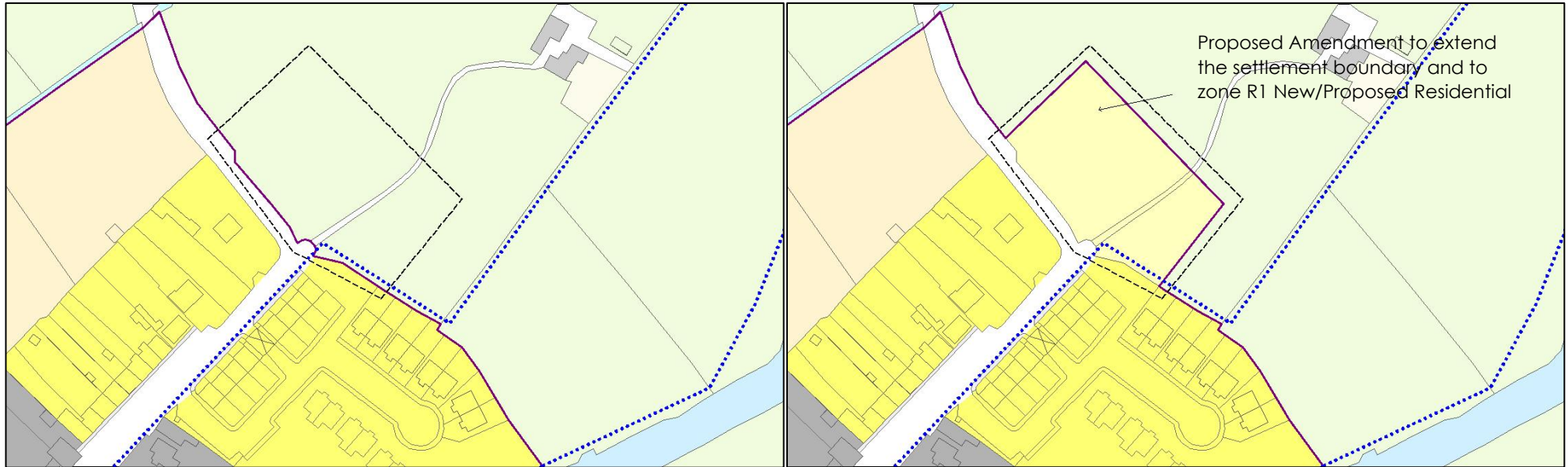


ID	Zoning	Road Access	Footpaths	Public Lighting	Foul/storm Sewer	Water Supply	Tier	Area (ha)	Estimated Density Units p/ha	Potential Yield
	R1	✓	✓	✓	✓	✓	1	0.38	15-20	6-8

Settlement Capacity Audit – Highlighted Site

4.7.2 Amendment 28

It is recommended to amend the Sneem zoning map to extend the settlement boundary and to zone R1 New/Proposed Residential as follows;



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Proposed Amendment

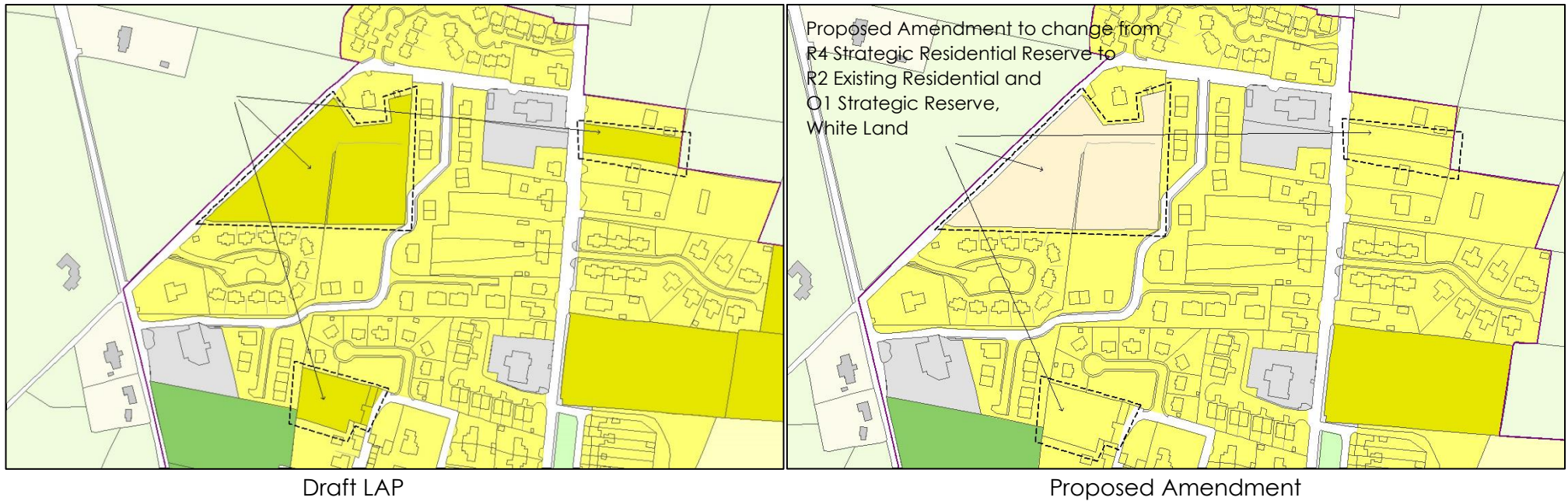
ID	Zoning	Road Access	Footpaths	Public Lighting	Foul/storm Sewer	Water Supply	Tier	Area (ha)	Estimated Density Units p/ha	Potential Yield
	R1	✓	✓	✓	✓	✓	1	0.5	15-20	8-10

Settlement Capacity Audit – Highlighted Site

4.8 Waterville Amendments

4.8.1 Amendment 29

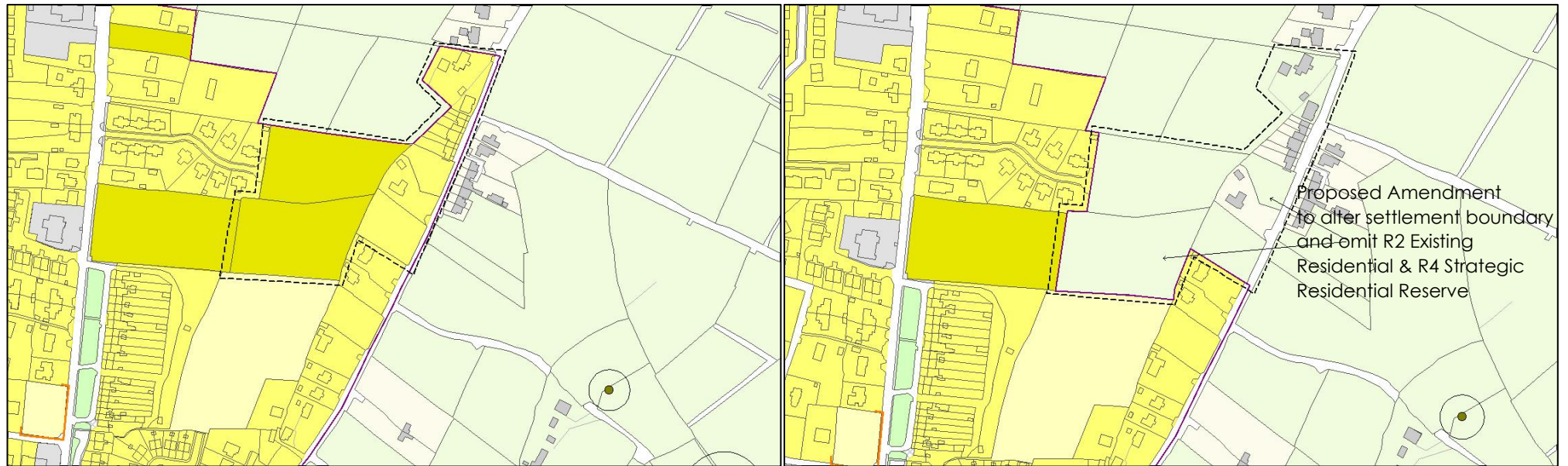
It is recommended to amend the Waterville zoning map from R4 Strategic Residential Reserve to R2 Existing Residential and O1 Strategic Reserve, White Land as follows;



ID	Zoning	Road Access	Footpaths	Public Lighting	Foul/storm Sewer	Water Supply	Tier	Area (ha)	Estimated Density Units p/ha	Potential Yield
WE-6	R4	✓	✗	✗	✓	✓	2	1.1	15-20	*
WE-7	R4	✓	✓	✓	✓	✓	1	0.19	15-20	*
WE-8	R4	✓	✓	✓	✓	✓	1	0.24	15-20	*

Settlement Capacity Audit – Highlighted Sites

It is recommended to amend the Waterville zoning map from R2 Existing Residential and R4 Strategic Residential Reserve to alter the settlement boundary as follows;



Draft LAP

Proposed Amendment

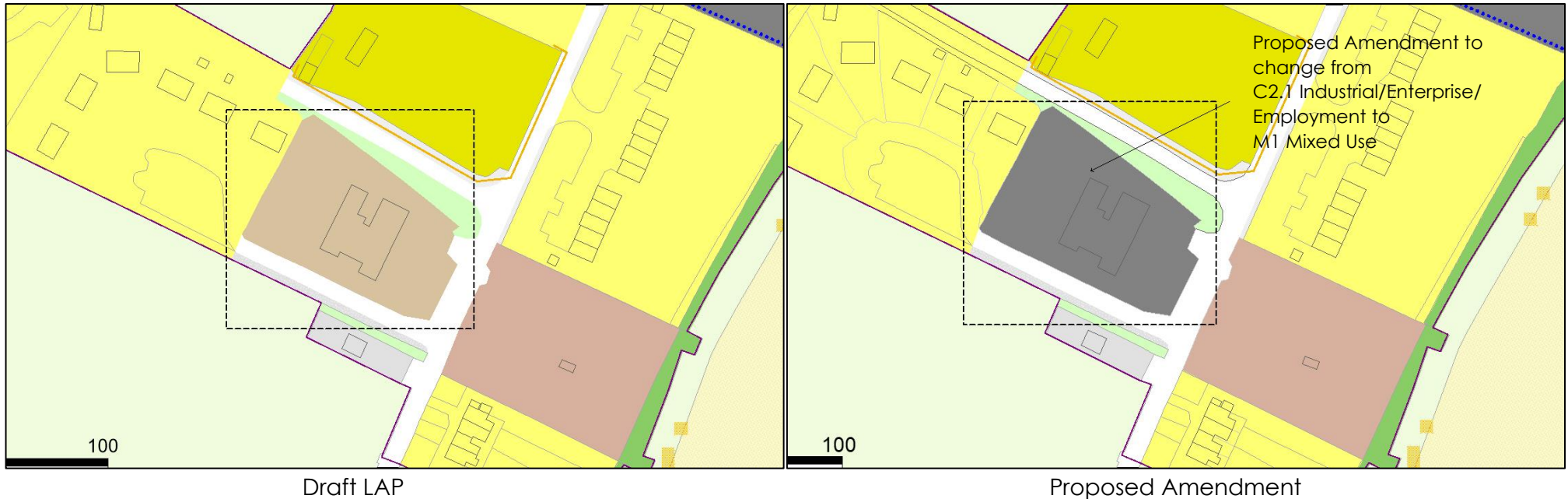
ID	Zoning	Road Access	Footpaths	Public Lighting	Foul/storm Sewer	Water Supply	Tier	Area (ha)	Estimated Density Units p/ha	Potential Yield
WE-9	R4	✓	✓	✓	✓	✓	1	2.65 1.0	15-20	*

Settlement Capacity Audit – Highlighted Sites

4.9 Baile an Sceilg Amendments

4.9.1 Amendment 30

It is recommended to amend the Baile an Sceilg zoning map from C2.1 Industrial/Enterprise/Employment to M1 Mixed Use as follows;



4.9.2 Amendment 31

It is recommended to amend the text of Section 3.4.1.6 as follows;

~~The gteic hub at Ballinskelligs provides remote working facilities. The project received financial supports through rural development funding. The facilities currently centre on six coworking spaces divided across two rooms, along with kitchenette facilities and with 1GB fibre broadband available.~~

The gteic hub at Baile an Sceilg, developed by Údarás na Gaeltachta, provides remote working facilities. The facilities currently centre on six coworking spaces divided across two rooms, along with kitchenette facilities and with 1GB fibre broadband available. A purpose-built hub, to encompass co-working facilities, training and meeting rooms and other office space is currently being constructed in the Údarás na Gaeltachta. When completed, this facility will provide workspace for c.50 individuals. This project has received financial support through rural development funding, co-funded by Údarás na Gaeltachta.

4.10 Beaufort Amendments

4.10.1 Amendment 32

It is recommended to amend Objective KENMD-BT-4 as follows;

Facilitate and support the provision of pedestrian footpaths within the village *and to implement traffic calming measures as appropriate.*

4.11 Dún Géagáin Amendments

4.11.1 Amendment 33

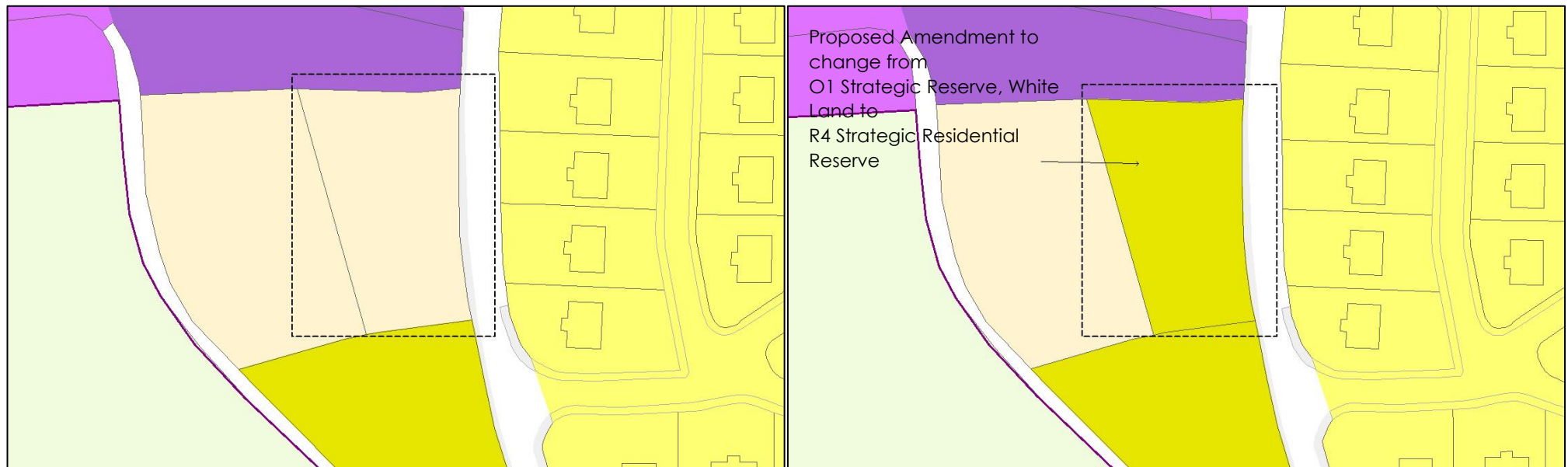
It is recommended to include an additional objective for Dún Géagáin (General Objectives) as follows;

Seek the improvement of pedestrian connectivity between the village & beach, subject to environmental assessments.

4.12 Kilgarvan Amendments

4.12.1 Amendment 34

It is recommended to amend the Kilgarvan zoning map from O1 Strategic Reserve, White Land to R4 Strategic Residential Reserve as follows;



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Proposed Amendment

4.13 Knightstown Amendments

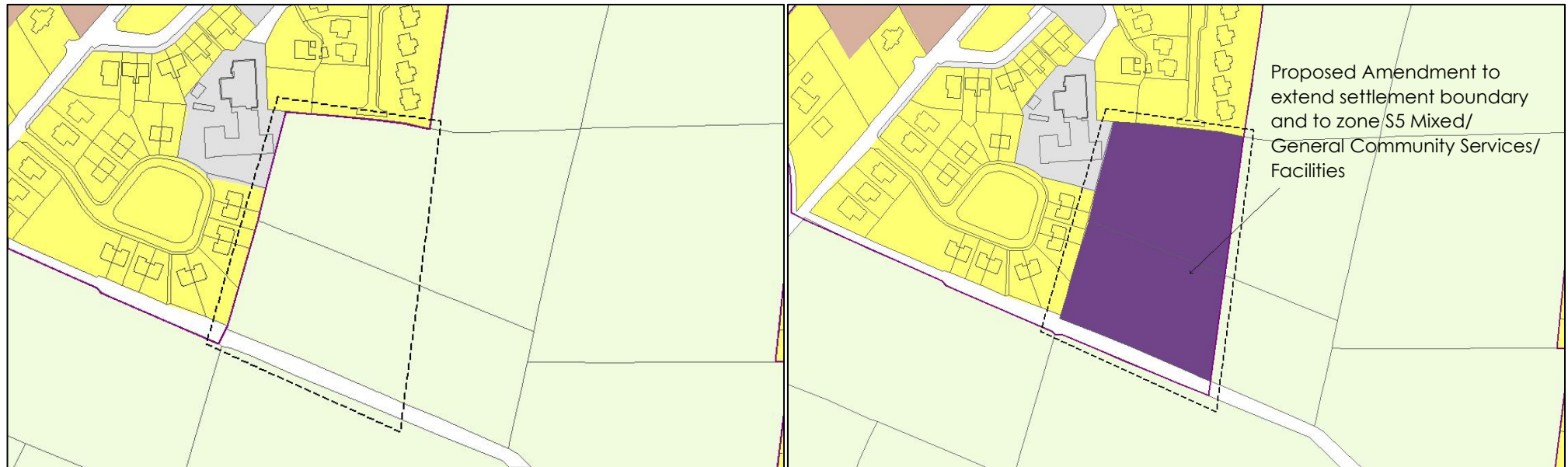
4.13.1 Amendment 35

It is recommended to include the following additional text in Section 3.4.7.1 as follows;

Within Knightstown is the Altazimuth Stone, which played a significant role in the development of sea navigation techniques with the determination of longitude.

4.13.2 Amendment 36

It is recommended to amend the Knightstown zoning map to extend the settlement boundary and zone S5 Mixed/General Community Services/Facilities as follows;



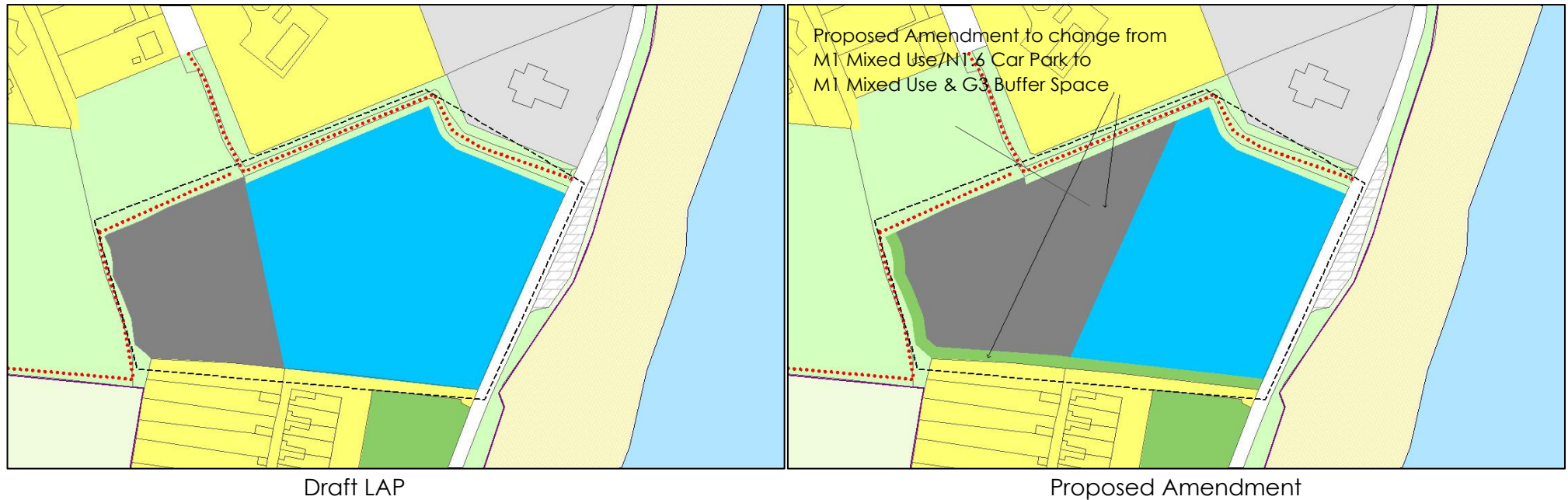
Draft LAP

Proposed Amendment

Proposed Amendment to extend settlement boundary and to zone S5 Mixed/General Community Services/Facilities

4.13.3 Amendment 37

It is recommended to amend the Knightstown zoning map from M1 Mixed Use/N1.6 Car Parking to M1 Mixed Use & G3 Buffer Space as follows;



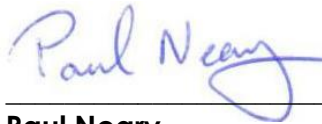
4.13 Portmagee Amendments

4.13.1 Amendment 38

It is recommended to include a new objective for Portmagee (Overall Objectives) as follows;

Support the sustainable development of water recreation facilities at an appropriate location in the village of Portmagee subject to environmental assessment.

Signed:



Paul Neary

Actg. Director of Services / Stíúthóir Seirbhísí

Planning, Environment & Emergency Management / Pleanáil, Comhshaol & Bainistíocht Éigeandála

Date:

4th January 2024