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Re: Submission by the Land Development Agency in relation to the Draft Kerry County Development Plan 2022-2028.

The Land Development Agency (LDA) welcomes the opportunity to make a submission in respect of the Draft Kerry County Development Plan 2022-2028 (the Draft Plan). The LDA is a commercial state-sponsored body that has been created to coordinate land within public control for more optimal uses, where appropriate, with a focus on the provision of affordable housing. In this context we have reviewed the Draft Plan to ensure the views and objectives of the LDA as a potential stakeholder within County Kerry are represented.

This submission is structured as follows:

1. Role of the LDA
2. Housing For All and the LDA

1. Role of the LDA

The role of the LDA is set out in the Land Development Agency Act 2021 (the Act) and is focussed on publicly owned land within 'Census Towns'. A 'Census Town' is defined in the Act as:

"The area of a town (including all the environs of the town for the purpose of the census of population concerned) the population of which, when rounded to the nearest 500 as shown in the latest census report of the Central Statistics Office, is equal to or greater than 10,000 persons".

There are two Census Towns located in County Kerry; Tralee (23,691, Census 2016) and Killarney (14,504, Census 2016). Land owned by a 'Relevant Public Body', within a 'Census Town', is considered 'Relevant Public Land'. Relevant Public Bodies include local authorities and other organisations contained in Schedules 1 and 2 of the Act. Examples include the Health Service Executive, the OPW, CIE and the ESB.

The LDA is required by the Act to establish and maintain a register of all Relevant Public Land to be known as the 'Register of Relevant Public Land' (the Register). The LDA is also required to prepare a report to the Government on Relevant Public Land (the Report). The Register and the Report are currently being prepared. The Act makes provisions for Relevant Public Bodies to notify the LDA of their intention to dispose of Relevant Public Land and for the Government, having considered the Report, to direct the LDA to acquire public land.

The Act also outlines specific services which the LDA may provide to local authorities. Specifically, a local authority may request the LDA to provide services to it in relation to the development of sites for housing and urban development that are:



*“(a) large scale, multi tenure or mixed-use development sites that may include sites that are fully or partially intended to secure the implementation of all or part of an accommodation programme, within the meaning of the Housing (Traveller Accommodation) Act 1998, and
(b) located in the area of a town (including all the environs of the town for the purpose of the census of population concerned) the population of which, when rounded to the nearest 500 as shown in the latest census report of the Central Statistics Office, is equal to or greater than 30,000 persons, and that are on land owned by the local authority in order to assist the local authority in the performance of its functions.”*

There are no towns in County Kerry with a population greater than 30,000. However, the Register and Report will contain details of ‘Relevant Public Land’ within Tralee and Killarney as they have populations greater than 10,000. The LDA looks forward to engaging with Kerry County Council, as appropriate, during the development and preparation of the Register and Report on Relevant Public Land.

2. Housing For All and the LDA

There are a number of references in the Draft Plan to ‘Housing for All’ (HfA), the Government’s housing policy to 2030. This provides a clear strategy to prioritise delivery of quality affordable and sustainable housing and build the pipeline for the future.

The Draft Plan also refers specifically to the LDA and, while there are no public lands identified for transfer to the LDA within the Kerry County Council area, the LDA welcomes the intention of the Council to work together with us to facilitate the assembly/acquisition, financing, and appropriate redevelopment of suitable, publicly owned, sites in the future.

Draft KCDP Objective 4-1 supports the objectives and actions of HfA. It is suggested that a reference to the LDA could be inserted into this objective as follows:

It is an objective of the Council to:

KCDP 4-1 Support and facilitate the objectives and actions in Housing for All (HfA) to regenerate towns and villages, to tackle dereliction, vacancy, to deliver site assembly opportunities, ~~and~~ to promote the sustainable development of land to achieve compact growth and increased population in these centres and to engage with the Land Development Agency (LDA), where appropriate, in the identification, planning and co-ordination of strategic, publicly owned land banks to achieve compact growth, sustainable development, and urban regeneration.

3. Conclusion

The Draft Kerry County Development Plan represents a positive comprehensive, detailed, and ambitious strategy for the ongoing sustainable development of the county over the plan period and into the future. Overall, the LDA is supportive of the principles of the Draft Plan. However, we request Kerry County Council to review the contents of this submission and consider the requested change ahead of adoption.

The LDA would like to thank Kerry County Council for the opportunity to comment on the Draft County Development Plan 2022-2028 and looks forward to further engagement on publication of the Material Alterations to the draft.

Kind Regards,

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