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**Re: Kerry County Development Plan:
Consultation for Draft Kerry County Development Plan 2022-2028**

23rd February 2022

Dear Mr Ginty

On behalf of the Southern Region Waste Management Plan Authority (SRWMPLA), thank you for the opportunity of making a submission regarding the consultation for the draft Kerry County Development Plan 2022-2028.

In relation to the context of our submission, please note that our current Southern Region Waste Management Plan 2015-2021, along with Ireland's other two Regional Waste Management Plans, will be replaced by the National Waste Management Plan for a Circular Economy, draft of which will be made available for public consultation in Quarter 3 of 2022.

The following are some items which we wish to highlight in relation to the draft Kerry County Development Plan.

General

We acknowledge the many areas of the draft County Development Plan 2022-2028 where direct reference is made to the Circular Economy and the different benefits, including environmental and economic, that arise from applying the concept of the Circular Economy. We acknowledge the references that are made to the Circular Economy, especially in the Introductory Chapter 1, and Chapters 2, 4, 9 and 13.

Chapters 3, 6

We suggest that the Circular Economy should also form part of the Core Strategy as outlined in Chapter 3, and inclusion of the benefits also in Chapter 6: Sustainable Communities, and including special mention of the opportunities for social enterprises based on the Circular Economy.

Chapter 13

Section 13.3.1 Waste Management Infrastructure

At the end of this section, it states:

‘The Council will facilitate the sustainable provision of additional waste facilities at appropriate locations in accordance with the Waste Management Infrastructure Guidance for Siting Waste Management Facilities 2015-2021’

Suggested wording is as follows:

‘The Council will facilitate the sustainable provision of additional waste facilities at appropriate locations in accordance with the *Waste Management Infrastructure Guidance for Siting Waste Management Facilities*. This Guidance will be included in the upcoming *National Waste Management Plan for a Circular Economy (NWMPE)*, which will replace the *Southern Region Waste Management Plan 2015-2021* and the regional waste management plans for the other two regions.’

Section 13.3.3 Circular Economy

In Section 13.3.3 which is focussed fully on the Circular Economy, the following statement is included:

‘The Council will, therefore, support the development of a Circular Economy and the implementation of *Closing the Loop – the EU Action Plan* for the Circular Economy at regional level.’

We suggest that reference also be made here to the European Commission’s more recent Circular Economy Action Plan: *A New Circular Economy Action Plan for a Cleaner More Competitive Europe*, launched in March 2020, which forms one of the main blocks of the European Green Deal. The New Circular Economy Action Plan builds on the aims and achievements of the first Circular Economy Action Plan *Closing the Loop* which was launched in 2015.

Also on a national level, Ireland’s new roadmap for national waste management planning and management is outlined in the *Waste Action Plan for a Circular Economy - Ireland’s National Waste Policy 2020-2025* which was published in September 2020.

Similarly, we suggest these references are also included in KCDP 13-39.

Section 13.3.6 Construction and Demolition Waste

Reference is made as follows:

'The Council will have regard to the requirements of the Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects (DEHLG, 2006) and any updated version of the guidelines when assessing planning applications for developments which will generate significant levels of C&D waste'.

Please note that the most recently published guidelines are *Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects*, published in 2021 by Environmental Protection Agency.

Volume 6 – Other Documents

1 Development Management Standards and Guidelines

1.3 General Standards applicable to all Development Types

1.3.1 Energy Efficiency, Sustainable Design and Construction

We consider it relevant to include in this section, a reference to the importance of incorporating within sustainable design principles the planning for repurposing and reuse of buildings in preference to demolition and rebuild, especially in relation to design of commercial and large scale buildings.

1.5 Residential Development

1.5.4 General Residential Development Design Standards

1.5.4.16 Construction Waste Management Plan

Reference could be made here to *Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects*, published in 2021 by Environmental Protection Agency.

The SRWMPLA will be happy to provide further input or assistance regarding waste management, resource efficiency or the circular economy.

Yours faithfully



Margaret Murphy
Resource Efficiency Officer
Southern Region Waste Management Plan Office