

23/02/22

Paul Lynch and Noel Lynch

Redacted - Personal Information

Attn: Mr Damien Ginty - Senior Planner

Planning Policy Unit,
Kerry County Council,
Rathass, Tralee,
Co.Kerry.
V92H7BT

RE: Submission to Draft County Development Plan 2022 - 2028

Dear Sir,

I welcome the opportunity for public submissions to the compilation of the Kerry County Development Plan 2022-2028 and wish to make the following observation to be considered for inclusion.

The purpose of this submission is to have lands at Banna Mountain, Ardfert, namely the building known locally as 'The Shop' and adjoining site curtilage, which is in my family ownership, excluded from the SAC & Akeragh, Banna and Barrow Harbour SPA 004079, to facilitate remediation and re-development of the site to provide a fitting and appropriate gateway building, while incorporating modern facilities at the entrance to Banna Beach (Figure 1).

The proposal to designate this area as suitable for re-development is founded on the basis of minimising the impact on the surrounding habitat, as an existing serviced building is in-situ, with power, water and wastewater infrastructure already established on the site (Figure 2).

The building known as 'The Shop' is in need of significant intervention to re-develop it to compliant, aesthetically pleasing and appropriate condition befitting its association with the jewel in the crown of North Kerry's pristine beaches, Banna.

Its re-development aligns with key strategic objectives contained within the Draft County Development Plan 2022 – 2028 which I will outline below. I request that the plan consider the long-term benefits; and facilitation of achieving the plans aims, by re-classifying the area to enable meaningful re-development of a signature attraction. We the owners are amenable to working with Kerry County Council through our designers to propose a sympathetic and sustainable building of note.

The proposal is founded on the overarching aim of two key chapters of the Draft County Development Plan 2022 - 2028; **Chapter 10 Tourism & Outdoor Recreation** and **Chapter 11 Environment** and is in keeping with *"The primary aim of the County Development Plan to protect and enhance Kerry's natural environment, built, cultural and linguistic heritage, upgrade existing facilities and provide a world class experience for tourists which will ensure the continued success of the Tourism Sector for the county."*



Figure 1 Approach Road and Entrance to Banna Beach Carpark 1 with 'The Shop' in the mid-ground.



Figure 2. Ariel View of lands subject to the submission

Chapter 10 Tourism & Outdoor Recreation

County Kerry's Economic Recovery Plan 2021, the emerging Local Economic and Community Plan and the Tourism Strategy strives to retain, promote, and drive Kerry's position as a premier international tourism destination, with a focus on developing green and sustainable tourism.

Banna Beach as a wayfinder location on the Wild Atlantic Way, holds a position of prominence as one of five primary pristine blue flag beaches of North Kerry and is of strategic importance to Kerry, located in proximity to its largest urban hub, Tralee.

Banna Beach is an area of national and international renown, recognised as the second top beach in Ireland by Trip Advisor, but its graduation to a world-class location in terms of fixed tourist and local amenity offering on a year-round basis is greatly stifled by the absence of a permanent Retail/recreational/café/dining/changing/shower & modern toilet facilities.

It is noteworthy and welcome, that temporary and mobile retail, leisure, and commercial enterprises at Banna Carpark 1 add a special dynamic to the seaside vibe, through an injection of vigour and colour in peak summer months. However, Banna starkly lacks a beachside, year-round permanent facility that has durability to the elements and longevity in provision of services which a mobile solution simply cannot offer across winter months.

Appropriate designation of 'The Shop' site in the County Development Plan would enable the encompassing of these public facilities in a bench-mark sustainable design for other locations. Through suitable and considered planning the authority could ensure protection of the environment; whilst safeguarding the needs of host communities and job creation.

I further note with interest that Kerry County Council are committed in conjunction with Failte Ireland to sustainably improve facilities along the WAW route subject to appropriate environmental assessments, and I believe re-designation paves the way for achieving this aim in Banna.

The following Development Objectives for Tourism and Recreation are relevant to this submission:

KCDP 10-6	Promote and facilitate tourism as one of the key economic pillars of the County's economy and a major generator of employment and to support the provision of facilities such as hotels, aparthotels, tourist hostels, cafes, restaurants and visitor attractions.
KCDP 10-7	Support the implementation of the County Kerry Tourism Strategy and Action Plan (2016-2022) including the upgrading and repurposing of existing attractions, the development of the tourism projects and the preparation and adoption of successor strategies.
KCDP 10-10	Encourage tourism developments, visitor accommodation, interpretation centres, and commercial / retail facilities serving the tourism sector to be located within established settlements thereby fostering strong links to a whole range of other economic and commercial sectors and sustaining the host communities.

KCDP 10-12	<p>Facilitate the sustainable development of the Wild Atlantic Way touring route by:</p> <ul style="list-style-type: none"> Facilitating the sustainable development of viewing points and other facilities at appropriate locations along the Wild Atlantic Way.
KCDP 10-14	<p>Support new and existing festivals and cultural events at suitable locations within Kerry subject to the appropriate licensing arrangements, in consultation with stakeholders such as community groups, local businesses and residents where feasible and practical, and to protect and safeguard the amenities and the natural and built heritage of the area.</p> <p><i>(As a longer-term vision, we would welcome the establishment of a sea festival and could assist in facilitating this through a permanent facility. With input and co-ordination from other stakeholders and community interest groups in Banna, Carpark 1 could be used as a pavilion for a sea/habitat/eco-friendly based festival akin to Sea Sessions Surf and Music festival in Donegal. Re-development and provision of expanded facilities at 'The Shop' would help enable the establishment of this through provision of key services.)</i></p>
KCDP 10-15	<p>Promote and support the use of suitable public open spaces in towns and villages for outdoor events of interest to both locals and tourists.</p> <p><i>(As a longer-term vision, we would welcome the establishment of a sea festival and could assist in facilitating this through a permanent facility. With input and co-ordination from other stakeholders and community interest groups in Banna, Carpark 1 could be used as a pavilion for a sea/habitat/eco-friendly based festival akin to Sea Sessions Surf and Music festival in Donegal. Re-development and provision of expanded facilities at 'The Shop' would help enable the establishment of this through provision of key services.)</i></p>
KCDP 10-16	<p>Support and facilitate the adoption of a green standard for environmental sustainability performance for all major festivals held in County Kerry.</p> <p><i>(As a longer-term vision, we would welcome the establishment of a sea festival and could assist in facilitating this through a permanent facility. With input and co-ordination from other stakeholders and community interest groups in Banna, Carpark 1 could be used as a pavilion for a sea/habitat/eco-friendly based festival akin to Sea Sessions Surf and Music festival in Donegal. Re-development and provision of expanded facilities at 'The Shop' would help enable the establishment of this through provision of key services.)</i></p>
KCDP10-28	<p>Encourage the sensitive redevelopment and / or return to suitable use, of derelict, vacant or redundant buildings, in appropriate locations in order to provide for visitor accommodation and tourism development</p>
KCDP 10-53	<p>Support the provision of appropriately designed and located toilet and changing facilities at blue flag beaches in the county and at other locations</p>

	subject to need assessment and environmental compatibility.
10.3.2 Major Attractions	<p>Sustainable tourism facilities, when properly located and managed and particularly if they are easy to get to by a range of transport modes, will encourage longer visitor stays, help to extend the tourism season and add to the vitality of settlements throughout the year[4].</p> <p>In order to increase visitor numbers and visitor spend throughout the County, Kerry must upgrade its existing attractions and new signature attractions capable of competing with attractions nationally and internationally.</p> <p>Developing 'The Shop' at Banna with extended services would provide a destination and focal point for visitors along the Wild Atlantic Way and locally in Caravan Parks and beyond, and would serve to extend the tourism season and add to the vitality of the area.</p>
10.3.3 Festivals and Events	<p>It is the policy of the Council to support existing festivals and cultural events which take place in the county and to promote the development of a variety of new festivals and events, especially outside the peak summer months, to appeal to a range of different visitors and to increase and build the profile of the county as a key tourism destination.</p> <p>(As a longer-term vision, we would welcome the establishment of a sea festival and could assist in facilitating this through a permanent facility. With input and co-ordination from other stakeholders and community interest groups in Banna, Carpark 1 could be used as a pavilion for a sea/habitat/eco-friendly based festival akin to Sea Sessions Surf and Music festival in Donegal. Re-development and provision of expanded facilities at 'The Shop' would help enable the establishment of this through provision of key services.)</p>
10.4.1 Adventure Tourism	County Kerry has excellent natural outdoor recreation assets including mountains, forests, lakes, rivers, and beaches and has the capacity to become a year-round international outdoor activity destination.

Chapter 11 Environment

Our proposal to exclude ‘The Shop’ at Banna and its curtilage from the SAC and SPA and to designate it as suitable for development would enable us to fulfil a common ambition as the landholder, and KCC as administrators, to comply with and fulfil the objectives contained within the County Development Plan Chapter 10 Tourism & Outdoor Recreation highlighted above.

By including the full area perceived issues around Environment can be mitigated. A holistic approach can be applied, where sympathetic design, mitigation and minimisation of impact with the dune system, planting, screening, suitable walkways and boardwalk for the protection of pedestrians and dune system, and the development of amenable and suitable customer facilities could be incorporated.

Our alternative would be the refurbishment of the existing building in its current state which we believe would represent a missed opportunity for a bigger picture in achieving the Development Plans Objectives, long term.

The following Development Objectives for Environment relevant to this submission:

KCDP 11-52	<p>Prohibit the removal of beach material, aggregates, sand and gravel, including the removal of material from sand dune ecosystems.</p> <p>Through subsequent innovative design on the site we believe our proposal will assist in protection of the dune system by regularising access. Through sensible landscaping measures integrated in the design, current Marram mitigation could be bolstered to achieve this objective.</p>
KCDP 11-53	<p>Protect the sand dunes of the County, (which include annexed habitats), and prohibit any development that would damage the integrity (ecological and visual) of these areas.</p> <p>The present building on-site dates from the 1950's and is of a different era with little visual sympathy to its environs. A new sustainable design on the site could enhance the visual amenity at the entrance to our beloved blue flag beach.</p>
KCDP 11-54	<p>Provide car parking and regularise beach related commercial facilities in the Sand Dune area/coastal areas of the Maharees, Inch, Banna and other coastal locations so as to protect the overall integrity of the sand dunes. Any proposal must have regard to nature conservation and landscape designations. Any works proposed must be in compliance with Article 6 of the Habitats Directive.</p> <p>Redeveloping ‘The Shop’ and its curtilage would provide a regularised and sustainable year round commercial facility at Banna, which in turn would provide employment and and much needed amenities for year round visitors.</p>
KCDP 11-55	<p>Work with local stakeholders and community-based organisations to facilitate and support community led initiatives to protect the coastal areas from erosion and to mitigate the effects of climate change, subject to environmental assessment.</p>

	If 'The Shop' was opened to re-development we are amenable to a sponsorship programme whereby community initiatives to educate the public on coastal protection, sea pollution and litter, global warming etc could all be facilitated from the premises.
KCDP 11-57	Support coastal initiatives such as the Green Coast Award and Blue Flag scheme and seek to ensure that coastal areas and bathing waters are maintained to the highest level to provide a valuable recreational resource in the County. As an extension of KCDP11-55 the re-developed business would become a leader in green initiatives related to the premises and all commercial activity.
KCDP 11-58	Facilitate and support community groups in the provision and management of toilet, changing and parking facilities at blue flag beaches and other suitable coastal locations, where appropriate and subject to environmental assessment. Our vision for the site incorporates the provision of facilities outlined to enable a more enjoyable and visitor focused range of facilities that currently exist at Banna.

Conclusion

This submission outlines a willingness on behalf of the landowner to engage meaningfully with Kerry County Council under the umbrella of the County Development Plan 2022 - 2028 to deliver an appropriate addition to Kerry's tourism and recreational offering at a world-renowned location along the famed Wild Atlantic Way.

Exclusion of the area as per Figure 2 is a key first step to beginning an exciting journey to providing a new signature attraction capable of competing with attractions nationally and internationally on a year-round basis.

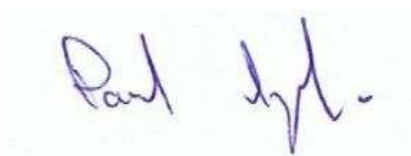
I believe through a thoughtful and measured planning consultation with the engagement of interested parties, a platform can be created whereby a flagship sustainable and harmonious commercial development can be created for the benefit of all patrons to Banna.

This approach would in my opinion lead to achieving some high-level strategic priorities by ensuring the continued success of the tourism sector for the county; facilitating the development of a sustainable new tourism project and provide a world class experience for visitors.

I wish you well in your endeavours in developing the plan for the betterment of our county and encourage Kerry County Council to consider our proposal as set down in this submission.

Sincerely,

Paul Lynch



Noel Lynch

