

Milltown Community and Chamber Alliance – submission to Kerry County Council in respect of the draft County Development Plan (CDP), 2022-2028

February 2022.

In September 2020, Milltown Community and Chamber Alliance made a submission to Kerry County Council in respect of the *An Daingean Local Area Plan (2021-2027)*. That submission was informed by objective research and extensive local consultations. Having reviewed that submission in the context of the forthcoming CDP, the Chamber Alliance wishes to re-state its commitment to it, and we encourage Kerry County Council to utilise the CDP framework to advance the proposals we put forward in respect of the LAP.

In response to the draft CDP, published by Kerry County Council in December 2021:

We welcome the reference (1.9.1.2) to the UN Sustainable Development Goals 2030 and the subsequent statement: ‘Compliance with the Sustainable Development Goals is a main tenet of this Development Plan’. We also welcome the plan’s acknowledgement of the eleven EU thematic objectives and the European Green Deal, and we welcome the statement that these have been integrated into the county development plan policy. We are concerned, however, that later sections of the draft plan (especially Chapter 14) disregard these objectives, and we recommend a re-drafting of Chapter 14 to bring it into line with the overarching sustainable development objectives.

The draft plan rightly references the National Planning Framework, and we note the particular significance, for Milltown, of strategic outcomes 3, 4, 5, 7, 8, 9 and 10¹. These already underpin our LAP submission, and they need to be fully reflected in the rollout of the CDP as well.

We welcome the reference to *Housing for All* (1.9.3.5) and note the specific roles the regeneration of Milltown can play in the delivery of this policy.

We note that the KCC Climate Change Adaptation Strategy 2019-2024 (1.9.5.3) will come up for renewal during the lifetime of the forthcoming county development plan, and we strongly recommend that it give greater local effect to the recently enacted climate change bill, particularly in respect of public transport provision and green and active travel. Our LAP submission provides for public transport installations, and we call on Kerry County Council to prioritise investment in this infrastructure.

Chapter Two of the draft CDP deals with the climate crisis and the role of planning in mitigating its excesses. This refers to relevant legislation and sectoral frameworks. We would like to see these reflected more strongly in subsequent chapters of the plan, especially Chapter 14. These include the engagement with civil society (2.3.4). The draft plan (2.3.8) also references the Programme for Government and the commitment to a 2:1 ratio of expenditure between new public transport

¹ 3. Strengthened Rural Economies and Communities; 4. Sustainable Mobility; 5. A Strong Economy, supported by Enterprise, Innovation and Skills; 7. Enhanced Amenities and Heritage; 8. Transition to a Low Carbon and Climate Resilient Society; 9. Sustainable Management of Water, Waste, and other Environmental Resources; 10. Access to Quality Childcare, Education and Health Services;

infrastructure and new roads over its lifetime. Subsequent chapters in the draft plan appear to be out of sync with this reality, and their emphasis on roads could cause Kerry to lose out (to other counties) in respect of accessing national funds for the development of public transport.

The attainment of targets in respect of biodiversity (2.5.1) requires the preservation of valuable landscapes, not least the Kilcoleman Demesne, the wetlands and woodlands in the vicinity of Milltown. Their preservation is integral to ensuring that the policy objectives presented in Chapter 10 have any application in Milltown.

We welcome the commitment (2.6.1) that “expansion of settlements will generally be from the centre out and supported by an appropriate level of infrastructure and services”. Had this approach being pursued over the course of previous plans, Milltown would have avoided the growth pattern that emerged since the early 2000s. While it is not possible to undue that damage, steps can be taken to mitigate it, most notably the development of the parkland demesne – adjacent and linked to Milltown’s centre i.e. The Square.

While the commitments in respect of sustainable land management and decarbonisation (2.6.2) relate principally to agriculture, parklands and other recreational spaces, such as Kilcoleman Demense, are also highly relevant.

The draft CDP (p. 34) refers to enhancing the unique identity, character and built heritage of Kerry’s towns and to the further development of green and blue infrastructure. Milltown has significant assets in these regards that remain under-utilised, and we look forward to the CDP providing leverage for their harnessing and development.

Milltown is located in the area defined as the ‘Kerry Hub and Knowledge Triangle’ (page 35), as was the case in previous plans. There is no local evidence of this having conferred any benefits on the community. Indeed, it has had negative implications in respect of housing pressures and an increase in car-dependent commuting. While the County Council seems to feel an obligation to persist with this designation in order to align with the RSES, we respectfully suggest that the Regional Assembly ought to have consulted with the communities in the designated area about the impacts it would have on us. Indeed, the Regional Assembly ought to consult with us (and with the other communities) as part of their review / evaluation of this designation.

We welcome the designation of Milltown as a ‘regional town’ (Table 3.6), and we look forward to the development of the associated service functions. We are concerned, however, at the description of some regional towns as commuter towns, and we caution against pigeon-holing any town. Instead, towns need to be seen as multi-functional. Table 3.5 needs to be revised in that light e.g. regional towns, such as Milltown provide housing, employment, service, educational, recreational AND other functions. Our neighbouring communities (Listry and Castlemaine) should not be described as rural hinterlands, but as part of the network of multi-functional spaces and nodes in Mid-Kerry. We travel to Castlemaine for some services, and they come here for others, but we do not see ourselves as being in the other’s hinterland.

Listry has been excluded from the list of villages, although Faha has been included as a ‘small village settlement’. Listry needs to be included.

The projected housing allocation (+214), as presented in Table 3.7, is too high given the load Milltown has had to bear over the past two decades. It is absolutely essential that services, amenities and facilities be upgraded in line with our current population level before building any new homes and expecting families to contend with sub-standard services (most especially the absence of green / recreational spaces and the lack of school places).

We welcome KCC’s commitment (4.2.1), and trust that this will be pursued in the manner specified by government and by the Heritage Council – thus recalibrating Milltown’s development and ensuring the incorporation of its parkland demesne into the town. The four foci presented here (middle of page 48) are particularly relevant to Milltown, and we are keen to ensure the rapid, yet careful, rollout of the measures to address “the legacy of rapid unplanned growth/edge of town growth, by facilitating amenities and services catch-up”.

We welcome KCDP 4-3 (page 49) and look forward to the harnessing of Milltown’s heritage resources in rejuvenating our town. We welcome the associated commitments (Objectives 4-18 and 4-19), and we look forward to these being realised through the development of a town park in Milltown and the expansion of walks in the locality. The attainment of Objective KCDP 4-18 requires the development of a suitable buffer zone – free from vehicular traffic.

The legislative powers in respect of the derelict sites register (page 55) are long overdue, and the levies generated ought to be used to upgrade the public realm in the communities in which they are raised.

The commitments in respect of support for local retailers (Objectives 4-43 to 4-52) are welcome.

The wording in Table 4.1 ought to be amended to reflect the fact that towns, such as Milltown, cater for passing and tourist trade, in addition to the local population.

Chapter 9 needs to be more promotive in respect of the importance of agriculture and its current and future roles in Kerry’s economic development. The chapter places more emphasis on digital hubs than on farming, although even in 2028, the latter will be a larger employer, both directly and indirectly, in our county. Therefore, the plan needs to be more specific in relation to supports for the farming sector and the many ancillary industries and services it underpins. Towns like Milltown rely on the purchasing power of the local farming community, and the relationships between town and countryside need to be fostered in promoting our mutual and sustainable development.

This chapter (9) regurgitates the notion of a ‘knowledge triangle’ as an economic driver, although it fails to produce any objective or verifiable data to show that it has had any merits over the course of the past decade. We encourage Kerry County Council to put this unusual strategy on hold until it has been subject to rigorous, independent and objective evaluation. The social and environmental consequences of this strategy have been negative for Milltown, and we are concerned by its unfounded re-appearance in the draft CDP.

Chapter 14 is a source of deep concern to the Milltown Community and Chamber Alliance. Its content is at odds with the principles and values espoused in Chapters 1 and 2, and its thinking and approach are outmoded in respect of active and sustainable travel. We object to the inclusion of the 'Milltown Bypass' in Table 14.3, and we wish to point out that despite our constructive efforts to engage in dialogue with Transport Infrastructure Ireland, the community has not been consulted about this project. Indeed, our request for data on the cost-benefits of this project have gone unanswered. The proposal (of a bypass) has been rolled over in a number of county development plans, and this top-down practice is casting an unwelcome and uninvited shadow over Milltown, which has clearly delimited the town's ability to realise its potential. It needs to be deleted and scrapped once and for all. The suggested bypass route would dissect Kilcoleman Demesne, which is one of our greatest local assets. Were that to happen, the stated objectives in respect of place-making (Chapters 4 and 6) and outdoor recreation (Chapter 10) would not apply to Milltown, thereby excluding the community and others in Mid-Kerry from the benefits associated with these.

Milltown Community and Chamber Alliance has advised Kerry County Council of the merits of constructing a mini-roundabout at Larkin's Corner. Again, we encourage Kerry County Council to do so, even on a trial basis, after which the data on traffic flows could be independently assessed to inform future decision-making. Furthermore, we encourage the Council to enhance pedestrian safety in the vicinity of Milltown National School.