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A Chara,

The Green Party Kerry Branch welcomes the opportunity to make this submission to the Draft Kerry County Development Plan 2022-28. Below we have provided observations and proposals regarding the goals and objectives of the draft plan.

We welcome many of the goals and objectives of the draft plan, including the greater emphasis on sustainable development compared to previous plans. However, in this submission we are focusing on aspects of the plan we believe can be further improved. In that vein, we believe there are several missed opportunities in the draft plan, particularly in the areas of:

- protecting and promoting the interests of young people and future generations in Kerry
- ensuring that development in Kerry enhances the wellbeing of Kerry people in key areas such as health, housing and connectivity
- protecting Kerry's iconic natural environment
- leading and driving climate action in Kerry

This submission follows the structure of the draft plan. We have made observations and proposals on the following sections of the plan:

- Volume 1:
    - Chapter 1: Introduction
    - Chapter 2: Climate Change & Achieving a Sustainable Future
    - Chapter 5: Rural Housing
    - Chapter 6: Sustainable Communities
    - Chapter 10: Tourism & Outdoor Recreation
    - Chapter 11: Environment
    - Chapter 12: Energy
    - Chapter 14: Connectivity
- Volume 2:
    - 1. Tralee
    - 2. Killarney

To explain the reasoning behind our proposals, we have accompanied each proposal with a rationale, as shown in the following proposal, which is unique as it applies to every volume of the plan:

PROPOSAL: Replace all references to The National Climate Action Plan 2019 in the plan with references to the Climate Action Plan 2021.

RATIONALE: The 2019 plan has been superseded by the 2021 plan, and it is no longer appropriate to refer to the 2019 in the development plan.

Volume One

Chapter 1: Introduction | Kerry County Council (kerrycoco.ie)

PROPOSAL: An additional goal should be added, "Promote and protect the interests of young persons and future generations in Kerry from unsustainable development."

RATIONALE: It is very concerning that there is no reference to young people in any of the ten goals of the KCDP. This is particularly hard to understand as there is reference to promoting the interests of older people in goal ten, namely by developing an age friendly county. Young people's interests need to be protected from unsustainable development and including this as a goal of the plan is critical. If there is no such goal, then young people's interests are less likely to be protected and they are likely to feel less valued and more likely to feel like second-class citizens when compared to the other demographics that are referenced in the goals (citizens, investors, visitors and older people). In Volume One, the words 'young' and 'youth' are mentioned only 20 times between them, on 11 pages, mostly in passing. Of the significant references:

- There is one reference to the provisioning of services to young people and children.
- There is one reference to working with relevant agencies and authorities to advance the physical, social, and cultural needs of children and young people.

The above references to young people are not sufficient. The decisions that are made on the back of this development plan will affect younger generations far more than older generations, and young people should be given a more deserving place in the development plan than they have been given so far.

Most ironically, while the KCDP quotes the fact that Our Rural Future has a policy to 'Actively involve young people in rural areas in decisions that affect them and their future,' there is nowhere in the KCDP that refers to this. Nowhere in the KCDP are young people's voice considered. The KCDP as it stands does not reflect the Our Rural Future document in this respect, though it claims to do so. If the above goal is not added, and if objectives are not added to take young people's voices into account, then the reference to Our Rural Future should be removed, as the KCDP would not in such a case be in line with Our Rural Future.

PROPOSAL: An additional goal should be added, "Enhancement of the biodiversity in the County."

RATIONALE: In 2019, Ireland became the second country to declare a climate and biodiversity emergency. In addition, there are plans to form a citizens' assembly on biodiversity in April 2022. It is very concerning that during a stated biodiversity emergency, there is no reference in any of the goals of the plan to enhancing the county's biodiversity. Kerry possesses some of the most valuable landscapes in the country from a biodiversity perspective, as evidenced by the recent discovery of the rare Kerry Mousetail fern in Killarney National Park in September 2021. The natural landscapes in Kerry are a key part of the county's tourism sector, and not enshrining biodiversity in the goals of the development plan does a disservice to all the tourism jobs that depend on natural beautiful and biodiversity of Kerry. Not including reference to enhancing biodiversity in the goals of the plan would constitute a failure to recognize the biodiversity emergency that was announced by the government in 2019 and would mean that local government in Kerry does not intend to address the biodiversity emergency and protect and advance the interests of Kerry people who depend on the biodiversity of the county for a living. Addressing the scourge of rhododendron in Killarney National Park also requires strong support from the council, such as can be achieved through enshrining biodiversity in the goals of this plan.

PROPOSAL: In goal seven, remove the reference to investors, such that the goal is: "Maintain and provide additional **Services** for our citizens and visitors".

RATIONALE: It is not appropriate for a County Development plan to include the providing of services for investors as one of only ten goals in the plan. It is not appropriate for investors to be given such a high priority in the plan. While services for investors can and should be provided where sustainable, such services should not be of equal priority to the services to be provided to citizens. Equally, as Kerry has such a strong tourism sector, the services provided to visitors should be given a higher priority than investor services. While there is room in the chapters of the plan for indicating how services for investors can be provided, this should not be a core goal of the plan.

PROPOSAL: Add the word 'sustainable' to goal four such that it becomes 'Enhance **Sustainable Physical and Digital** connectivity internally, across the broader region and internationally.

RATIONALE: Goal two refers to a sustainable economy. It would thus be inconsistent to neglect to qualify the goal of enhancing physical connectivity with the word sustainable. The transport sector is a significant greenhouse gas emitter, and Kerry is very poorly served by sustainable transport options, including public transport and active travel infrastructure. It would be doing a disservice to the people of Kerry, particularly young people, to enhance unsustainable forms of physical connectivity at the expense of sustainable forms. Particularly in years to come, when climate action may result in incentives against unsustainable forms of transport such as private car use, it is critical that Kerry is prepared to meet the demand for sustainable forms of connectivity, which will open be possible is the sustainability of connectivity is enshrined in the goals of the plan. The faster Kerry is provisioned with improved

public transport and active travel infrastructure, the more easily Kerry people will be able to transition to a low-carbon economy in line with goal two of the plan.

Chapter 2: Climate Change & Achieving a Sustainable Future

PROPOSAL: Add an objective: "Promote awareness of the value of restored peatlands in storing carbon and mitigating climate change and promote and support efforts to both prevent further degradation of peatlands and to restore already-degraded peatlands."

RATIONALE: Peatlands are the world's largest natural terrestrial carbon store. Until recently, they were perceived merely as a source of fuel for home-heating. This perception remains and there is a general lack of awareness of the value of wet peatlands in mitigating climate change. There are 9 Natural Heritage Areas in Kerry designated for petalands. It is critical to improve awareness so that the carbon storage value of Kerry's peatlands can be fully harnessed in the fight against climate change. It is also critical that Kerry County Council is seen to be leading the way in supporting projects aimed at restoring the carbon storage value of peatlands.

The plan only contains twenty-one instances of the word 'peat' and one instances to the word 'bog', and none of these instances relates to the promotion of the importance of undrained peatlands for biodiversity and carbon storage.

There are arguably multiple places in the plan where the importance of protecting and enhancing peatlands should be included, including this chapter on climate change. This objective would highlight the importance of climate-action importance of peat lands. References to protecting and enhancing peatlands should also be included in other chapters (see below).

Chapter 5: Rural Housing

We strongly support the reinvigoration of rural towns and hubs.

PROPOSAL: In Section 5.7, add an objective: "Disincentivise the possession of second homes, even in towns, by requiring long-term residency and connection to locality through work and/or culture in all instances. The building of second homes or holiday homes should not be permitted unless year-round occupation (through letting or shared residency) is demonstrated.

RATIONALE: Given the limited supply and unaffordability of housing to working young people, there should be a strong commitment to disincentivise second homes. A sensible and fair way of increasing the supply of housing and thus the affordability of housing would be to disencentivize the buying of second homes, as one person's second home is another person's homelessness.

PROPOSAL: In Section 5.4, add an objective: "Ensure that cluster developments are safe for children and active travel through a focus on permeability, walk/cycleways, speed reduction to 30km/h, and active travel management."

RATIONALE: Alongside strengthening the vibrancy of towns and villages comes an obligation to make these hubs safe for active travel and children. Strong planning and appropriate infrastructure are necessary to achieve this.

PROPOSAL: In section 5.5.2, add an objective, "In rural areas under urban influence, and particularly in Gaeltacht areas, priority and weighting should be given to those actively involved in local cultural activities (music and creative arts) as well as with fluency or demonstrable interest in the Irish language."

RATIONALE: A shared culture is often a key aspect of thriving communities, and those actively engaging in cultural activities, including use of the Irish language, should be supported in entering into and becoming a part of rural communities under urban influence. This would also have the added benefit of bringing culturally active people together to enhance their local communities.

Chapter 6: Sustainable Communities

PROPOSAL: Replace KCDP 6-9, "Promote the delivery of social infrastructure and high-quality services, at appropriate locations, through collaboration with the Kerry Public Participation Network (PPN)", with "Promote the delivery of social infrastructure, high-quality services, and climate and biodiversity action projects through collaboration with the Kerry Public Participation Network (PPN)."

RATIONALE: As stated in the PPN Handbook, "A Public Participation Network (PPN) is a structure that brings together Community and Voluntary, Environmental and Social Inclusion groups in each local authority area". The KCDP 6-9 as it stands is not inclusive of the environmental aspect of PPN groups and should be altered to reflect the make-up and purpose of PPNs more accurately.

PROPOSAL: Add an additional objective in section 6.2.2, Healthy Communities: "Promote the importance of clean air and water, and work to both monitor and reduce the level of air and water pollution in the county".

RATIONALE: Clean air and water are key aspects of a healthy environment, and a healthy environment is one of the prerequisites for a healthy community. As a common good, air and water quality needs to be addressed at government level. Local government has a key role in both monitoring air and water quality levels in the county, raising awareness of the current state of air and water pollution, and working to reduce air and water pollution.

While there is reference in Chapter 11 to improving air quality, there is no reference there to monitoring air quality to ensure transparency and that measures taken are effective. Also, there should be a policy objective around air quality in the 'Healthy Communities' section of Chapter 6 in addition to the environment chapter. The fact that it is appropriate to include a policy objective in two chapters demonstrates its importance.

PROPOSAL: In section 6.3, Community Infrastructure, Services and Facilities, add an additional objective: "Encourage and support the use of vacant, unused or infrequently used buildings by communities, e.g., closed schools, churches, GAA halls, while working transparently with all stakeholders involved."

RATIONALE: The Program for Government, Our Shared Future, sets out the Government's plan to implement a Circular Economy Action Plan. A key aspect of the circular economy is to reuse and repurpose things that have served their original use to avoid waste of resources. In the context of the current housing crisis, and construction supply chain difficulties, it will be important to make optimal use of the county's current building stock, which should include working with stakeholders to make available unused or infrequently used buildings for communities.

PROPOSAL: Add an additional objective in section 6.3, Health Services: "Promote Sláintcare's SH24 service to encourage non-symptomatic Kerry citizens, particularly young people, to avail of the service's free sexual health tests."

RATIONALE: There is currently limited awareness in Kerry of the SH24 service, which provides a free self-administered testing service for sexually transmitted infections. As a predominantly rural county with very limited access to sexual health services, and considering the recently suspected large volume of undiagnosed Syphilis cases in Kerry (HSE concerned about undiagnosed syphilis cases in Kerry and Cork | RadioKerry.ie), this service should be advertised by the local authority to improve access to sexual healthcare in Kerry. This would be an effective way of improving community health without additional use of development resources in the county.

PROPOSAL: Add an additional objective in section 6.3.4, Education and Lifelong Learning: "Promote and support the development of apprenticeships in the county as alternatives to third level education options and promote awareness of current apprenticeship options."

RATIONALE: The government document, Our Rural Future, published in 2021, supports significantly increasing the number of apprenticeships to both promote alternatives to third level education and address the skills gap in certain sectors, including the construction sector, as well as emerging sectors linked to climate change mitigation, such as clean energy and green tech.

PROPOSAL: Add an additional objective in section 6.3.4, Education and Lifelong Learning: "Small schools should not be closed where they possess reasonable pupil numbers, and when there are clear justifiable savings in travel time and energy for the students. Kerry County council should encourage Kerry schools to participate in any available nationwide programmes aimed optimising resources in rural schools, such as the current Cluster pilot."

RATIONALE: Schools in rural areas are often a key binder of communities. When schools close in rural areas, it can lead to an evaporation of the community. In addition, car journeys carrying children to schools comprise a significant proportion of car journeys in Ireland and

closing small schools may result in increased journey times for some. Such factors should be considered when determining the future of schools with low pupil numbers.

PROPOSAL: Add an additional objective in section 6.3.5, Children and young people: "In order to advance the interests of young people living in Kerry, who often do not have a voice in planning and development decisions within the County, and in order to ensure that the development in the county will not result in younger generations having to bear the burden of unsustainable development, Kerry County Council will ensure that young people have a platform to participate in the development of the county, for example through a Kerry Youth Forum facilitated by the council or through enhanced outreach to young people in consultations on significant development projects in the county."

RATIONALE: It is not acceptable that the KCDP plan does not contain any measures to take the voices of young people in the county into account in development decision generally. Under section 6.3.5, Children and Young People, there is only one objective, namely, to "work with the relevant agencies and authorities to advance the physical, social, and cultural needs of children and young people". The physical, social, and cultural needs of children and young people cannot be fully met by only working with 'relevant agencies and authorities' and not working with young people directly. In the time of the climate and biodiversity emergencies, it is critical that young people's voices are hard, as it is young people and future generations that are most vulnerable to the effects of climate change. Kerry County Council should do its utmost to ensure that young people do not have to shoulder the burdens of decisions made by older generations without regard for the climate and biodiversity emergencies.

As stated above, in Volume One, the words 'young' and 'youth' are mentioned only 20 times between them, on 11 pages, mostly in passing. Of the significant references:

- There is one reference to the provisioning of services to young people and children.
- There is one reference to working with relevant agencies and authorities to advance the physical, social, and cultural needs of children and young people.

The above references to young people are not sufficient. The decisions that are made on the back of this development plan will affect younger generations far more than older generations, and young people should be given a more deserving place in the development plan than they have been given so far.

Most ironically, while the KCDP quotes the fact that Our Rural Future has a policy to 'Actively involve young people in rural areas in decisions that affect them and their future,' there is nowhere in the KCDP that refers to this. Nowhere in the KCDP are young people's voice considered. The KCDP as it stands does not reflect the Our Rural Future document in this respect, though it claims to do so. If the above goal is not added, and if objectives are not added to take young people's voices into account, then the reference to Our Rural Future should be removed, as the KCDP would not in such a case be in line with Our Rural Future.

Chapter 10: Tourism & Outdoor Recreation | Kerry County Council (kerrycoco.ie)

PROPOSAL: Add an objective: "Make Kerry a more attractive tourist destination for EV owners by installing additional fast charging (Chademo) infrastructure in strategic locations

throughout the county and particularly along the Ring of Kerry, including, for example, Kenmare and Cahersiveen."

RATIONALE: The use of electrical vehicle is a core part of the transition to a low carbon society (see goal 2 of the KCDP), and currently there are very poor fast charging facilities in Kerry, with one fast charger each in Killarney and Tralee. This likely discourages many private car owners from switching to electric vehicles, and also discourages many electrical vehicles owners for touring in Kerry. While there is mention of provisioning additional charging infrastructure of the plan, there should also be an objective to do this in the tourism section.

[Chapter 11: Environment | Kerry County Council (kerrycoco.ie)](#)

PROPOSAL: Add an objective, "Breaches of legislation to protect Kerry's environment will be prosecuted by KCC or a report will be sent to the relevant body for prosecution, which will be supported by KCC. Cases of malpractice by contractors must be prosecuted".

RATIONALE: Enforcement of environmental law is a vital issue which must not be overlooked. The destruction of Kerry's natural environment should not be taken lightly, and anyone breaking environmental laws should be held to account to demonstrate that it is not acceptable to bypass environmental law and harm the environment.

PROPOSAL: Add an objective, "The public is encouraged to submit observations of illegal habitat destruction or malpractice which impedes on the integrity of the county's biodiversity".

RATIONALE: Due to the dispersed populations living in rural areas in Kerry, it can be difficult for the Gardaí to become aware of breaches of environmental law. The Gardaí should be supported to carry out their duties by the wider public as much as possible. One obvious way to do this would be to encourage the public to submit observations of illegal habitat destruction. This would also allow the people of Kerry to become more active in the protection of Kerry's biodiversity.

PROPOSAL: Add an objective, "Empower local communities to tackle climate action. Work with Transition Kerry to build on the work done to-date in building a network of sustainable communities."

RATIONALE: The Transition Kerry network of individuals and groups has the potential to share knowledge and resources and empower each other. They can tackle many of the UN Sustainable Development Goals at a local level in a way that is relevant for their community. The network should be supported by the local authority for the sustainability services they provide to Kerry and to enhance those same services.

PROPOSAL: In section 11.2.3, Wetlands Support, add an objective, "Protect and enhance wetlands as nature-based solutions to flood management, climate change, and the biodiversity crisis."

RATIONALE: Wetlands can provide benefits with regard to water shortage, flood management, water treatment, enhancing biodiversity and carbon storage. The ecosystem services provided by wetlands should be valued and capitalized on. Land use and management systems that take no account of the importance of maintaining and protecting wetlands, and thus inevitably lead to the degradation of wetlands, should be discouraged.

PROPOSAL: In section 11.2.4, Invasive Species, add two objectives:

- "Raise awareness of the rhododendron crisis and actively support any groups endeavouring to eradicate invasive species in the Killarney National Park (particularly Rhododendron), such as Groundwork."
- "Develop an invasive species policy for Kerry, to include a public and contractor awareness campaign, as well as public species recording and guidance on what to do when invasive species are discovered."

RATIONALE: There is no reference to rhododendron in the KCDP, which is a surprising omission considering that rhododendron is one of the major challenges facing one of Kerry's key environment and tourism locations, Killarney National Park. The policy refers to 'managing' invasive species, but this is not a strong enough position considering the drastic state of the rhododendron situation in Killarney. The first policy objective proposed would acknowledge the crisis and show that the Kerry local authority is treating it seriously and supporting the efforts of local volunteers that invest significant time and energy into tackling the problem. The second objective proposed would address the fact that the eradication of invasive species requires long term and coordinated strategic policies and planning and cannot be fully addressed by piecemeal measures.

PROPOSAL: In section11.2.6, add an objective: "Identify biodiversity hotspots in proximity to each other which could benefit from creation of ecological corridors and actively seek to create these corridors."

RATIONALE: Development that is undertaken without regard for biodiversity often has a negative impact on biodiversity through the fragmentation of ecosystems. This fragmentation can be addressed by the creation of ecological corridors that allow animals to move between biodiverse areas and maintain their ecosystems. This proposal would be an efficient and affordable way of enhancing the biodiversity in Kerry.

PROPOSAL: In section 11.2.8, Woodlands and Trees, add the following three objectives:

- Create native woodlands which are accessible to all by supporting communities and working with stakeholders.
- All schools in the county must be made within walking distance of a native woodland amenity. To this end, the council will support initiatives aimed at creating these woodlands (suitable sites can be identified through mapping exercises).
- Survey all council lands, and where suitable for planting, native species are to be planted to create woodland amenities.

RATIONALE: A paltry percent of land in Ireland is native woodland. Native woodland is culturally and aesthetically important, and is critical for biodiversity. Native woodland also has carbon storage benefits, and is a source of enjoyment for many, allowing for walking in engaging with nature. Native woodlands can also be a source of wonder and education for children. Native woodlands should be made accessible to all to allow everyone the opportunity to benefit from the benefits of native woodlands, and the council should have a role in ensuring this is the case in Kerry.

PROPOSAL: In section 11.2.8, Woodlands and Trees, add an objective, "Penalise destruction of native woodlands and trees Under Wildlife Act 1976 to 2018 and Forestry Act 2014."

RATIONALE: As stated above, native woodland is culturally and aesthetically important, and is critical for biodiversity. Native woodland also has carbon storage benefits. Illegal destruction of native woodlands and trees should not be countenanced and should be penalized with the full rigour of the law. Historical lack of enforcement of the Wildlife Act means that it is necessary to include an explicit objective around this.

PROPOSAL: In section 11.3, add an objective, "Ensure KCC's procurement policy for new equipment meets best practice on air and noise pollution.

RATIONALE: The health and environmental consequences of air and noise pollution are well-documented, and any new equipment should not cause unnecessary air and noise pollution. A policy is required to ensure this is the case going forward.

Chapter 12: Energy | Kerry County Council (kerrycoco.ie)

PROPOSAL: In section 12.2, Gas Network, add the following objective: "Not support any gas infrastructure that is in any way tied to fracking, such as Shannon LNG."

RATIONALE: It is current government policy that LNG infrastructure should not be progressed until an energy review has taken place. This proposal aligns the KCDP with government policy. If this policy is not included in the plan, it would be difficult to argue that the plan is in line with government policy.

Chapter 14: Connectivity

PROPOSAL: In section 14.3, Active Travel and Greenways, add the following objective: "Worth with schools and any appropriate stakeholders to find creative ways to support active travel to schools, both in urban and rural areas, including for example creation of cycling infrastructure, covered bike storage spaces and parking-free zones to ensure the safety of students actively travelling."

RATIONALE: While the KCDP contains an objective to develop cycle ways with links to urban schools ("Develop in accordance with the National Cycle Manual and the NTA, an integrated

network of cycle ways in our larger urban centres, to ensure permeability within and between residential areas, linking to town centres, schools and places of work informed by Transport Mobility Plans for Tralee, Killarney and Listowel."), this is not ambitious enough and ignores the requirements of rural children. Rural children should be enabled and empowered to cycle or walk to school. While acknowledging that there are additional challenges in provisioning active travel infrastructure in rural locations, every school situation is different, and there are very likely creative solutions that could be supported by the local authority to allow rural children actively travel to school in a safe and comfortably. The local authority should endeavour to work with stakeholders to find such solutions and then implement them.

In addition, MaREI centre research ([Microsoft Word - How and Why We Travel – Mobility Demand and Emissions from Passenger Transport - MaREI Template.docx](#)) has shown that companion/escort journeys (such as dropping off children to school) have the highest emissions intensity by journey purpose, and comprise over one tenth of all journeys in Ireland. Providing safe and accessible opportunities for children to cycling to school should decrease the volume of such journeys, increasing air quality, reducing congestion and dangerous driving at school locations, and encourage a healthier lifestyle for children.

PROPOSAL: In Section 14.6, Air Transport, add the following sentence: "Kerry County Council acknowledges that Air Transport is an extremely carbon intensive form of travel, and air-travel is a significant contributor to climate change. As such, where reasonable lower-emission alternatives to air transport exist, as is often the case in regional journeys (such as the train from Farranfore to Dublin Heuston), it is the policy of Kerry County Council to support those alternatives rather than air transport."

RATIONALE: In line with the second goal of the KCDP, 'The transition to a **Low Carbon and Climate Resilient Society'**, it is inadmissible that the section on Air Transport does not acknowledge the significant greenhouse gas emissions caused by air transport compared to other forms of travel. Not acknowledging the harm that air travel causes in terms of climate change is incompatible with attempting to transition to a low carbon and climate resilient society.

PROPOSAL: Remove the word 'sustainable' from KCDP 14-48: "Promote and support the sustainable development of Kerry International Airport by optimising international/regional connectivity through investment and increased capacity and capitalise on the associated wider economic benefits for Kerry and the wider region."

RATIONALE: Air Travel, particularly air travel that is made possible through public service obligation levies, is in general not a sustainable form of transport, and it is both inappropriate and inaccurate to describe development of Kerry International Airport as sustainable if that development is aimed at optimising regional connectivity through air travel when public transport alternatives exist. This amounts to greenwashing and is incompatible with the second goal of the KCDP. If there are plans to develop and increase the number of flights operating out of Kerry, there should not be an attempt to greenwash this.

PROPOSAL: Add an objective under Section 14.5, Public Transport:

"Promote public transport over private vehicle and air transport, and do not support private vehicle and air transport initiatives if there are reasonable public transport alternatives that could be made available."

RATIONALE: The above objective must be in the plan if the plan it to truly have a goal regarding "The transition to a **Low Carbon and Climate Resilient Society"**. Promoting emissions-intensive forms of transport where lower-emission alternatives are possible contravenes this stated goal. In particular, in the Air Transport section, there is a very concerning lack of any mention of the contribution of air transport to climate change, and it is critical that no air transport schemes/initiatives are supported where there are lower-emissions alternatives available, such as public transport by rail and bus.

PROPOSAL: Replace KCDP 14-41, "Promote the sustainable delivery of a reliable, integrated, low-carbon and cost-effective public transport system for the County", with "Promote and proactively support the sustainable delivery of a reliable, integrated, low-carbon and cost-effective public transport system for the County."

RATIONALE: It is not sufficient that the local authority only promotes public transport. It should also proactively support public transport initiatives; not doing so would contravene the second goals of KCDP, "The transition to a **Low Carbon and Climate Resilient Society**".

PROPOSAL: Add an objective to section 14.9, Digital Connectivity: "Ensure the cybersecurity and cyber resiliency of the county through promotion of cybersecurity and cybersecurity best practices and through enhancement of the cybersecurity of critical infrastructure in the county, particularly in relation to ransomware threats."

RATIONALE: Cyberattacks, particularly ransomware attacks, are continually increasing both in frequency and the damage they cause. The HSE ransomware attack succeeded because of a lack of investment in cybersecurity, as clear from the report published by PWC (conti-cyber-attack-on-the-hse-full-report.pdf). It is critical that Kerry organizations, particularly critical infrastructure organizations, are cyber resilient, and the council has a role to play in ensuring and promoting the cybersecurity and cyber resiliency of the county.

Volume 2

1. Tralee

1.1 Introduction & Context

PROPOSAL: Modify section **1.1.3 Vision and strategy**, subsection **Plan for Sustainable Growth**, **point 5** "Sustainably strengthen the settlement through investment in key pieces of infrastructure such as the completion of the northern relief road and additional parking facilities for locals and visitors alike." to reflect the need to move to actual sustainable transport modes such as rail and active travel. Suggested wording: "Sustainably strengthen the settlement through investment in key infrastructure such as a network of high-quality, interconnected

cycle paths, enhanced footpaths & walkways, bicycle parking and high quality pedestrian measures at road junctions. Repurpose road space in the urban core for use for active travel modes and seek to locate car parking at the edges of the town to enable sustainable travel in the town for locals and visitors alike. For commuter and inter-county travel, the development of increased capacity for rail services, bus stops and bus priority will be supported."

RATIONALE: The prevalence of the private motor vehicle in the urban core of the settlement is preventing the development of active travel in the town. Without specific intent to re-prioritise valuable road space for active travel, the network will become disjointed and less attractive. The existing wording appears to proport that the development of a road and more car parking is sustainable when it is not. More roads and space to store private cars induces demand which is a net-negative for any settlement. In addition, specific support should be included for rail and bus service enhancement.

PROPOSAL: Strengthen **Tralee Town Strategic Objective TR 10** to specifically reference the need to re-prioritise road space to enable active travel. Suggested wording: "Improve inclusivity, accessibility, permeability, and connectivity throughout the town and where appropriate with the town to adjoining amenities for alternative more sustainable modes of transport, including cycling and walking by reprioritising road space from motor vehicles to active modes."

RATIONALE: The priority in current road and street design is at odds with the Council's stated hierarchy of road users. This must be reflected across all goals in the document.

1.2 Demographics

PROPOSAL: Modify **Residential Development Objective TR 12** to specifically reference the need to provide permeability and connectivity in all housing developments. Suggested wording: "Facilitate the development of 2,087 residential units within the town boundary ensuring permeability between developments and connectivity to the urban core by active means"

RATIONALE: Recent social housing developments have been insufficiently connected to the town centre by any means other than private vehicle. The new development in Lohercannon is an example which we reference where no additional measures to enable active travel were a condition of the development proceeding.

1.3 Climate Action

PROPOSAL: Strengthen Climate Action Objective TR17. Suggested wording: "Prioritise the regeneration of Tralee Town Centre as a compact town for residential, employment and services that are accessible by sustainable modes of transport including walking, cycling and public transport by re-prioritising road space from motor vehicles to active modes, bus lanes and bus stops."

RATIONALE: Specific wording is needed to enable the local authority to modify how street space is allocated.

1.4 Urban Regeneration

PROPOSAL: In section **1.4.1 Town Centre and Public Realm Strategy**, the following statement would enhance the ability of the town to regain vibrancy. Following paragraph 6 when ends "…surrounding coastal landscape." insert the following paragraph: "The vibrancy of the town centre can be enhanced further by diverting through motor traffic away from the urban core. The use of the eastern bypass road, new northern relief road and internal link roads will be used to manage through traffic away from the town centre. Such measures would not impact accessibility in the urban core for emergency vehicles, disabled persons or those choosing active modes."

RATIONALE: Specific measures to prevent through traffic accessing the town should be employed. Significant investment has been made in bypass and relief roads but the benefit to the town centre is not fully realised. For example, southbound traffic continues to utilise Castle Street & Denny Street instead of diverting to the eastern bypass road. By diverting this traffic, the number of vehicles in the town centre would decrease thereby enhancing the experience for people utilising the space.

1.11 Transportation

PROPOSAL: In section **1.11.1 Tralee Transport Strategy and Mobility Plan**, there is specific reference to pursuing measures identified in the Tralee Transportation Strategy 2011. We propose that the strategy, which is now a decade old, should be revised to align with modern thinking. Our proposal is that a review of the strategy be conducted within a short timeframe and all proposed re-design of junctions and road layouts be assessed with current design principles in mind. Further, an update to **TR 97** should reflect same.

RATIONALE: The Tralee Transportation Strategy 2011 is out of date and the drawings contained therein do not reflect current best practices.

PROPOSAL: In section **1.11.1 Tralee Transport Strategy and Mobility Plan**, **TR 98**: we propose the following amendment: Develop a Transport and Mobility Plan in to current best practise design standards including measures to trial experimental traffic designs. Such a plan should include public consultation and include input from subject matter experts, the Kerry County Council Active Travel team and relevant state bodies.

RATIONALE: The issues seen across the country where trial changes to how public space is used indicate the need to enable the local authority to make brave decisions. By implementing the above suggested wording, the local authority can progress changes to how urban space is used by leveraging experts in the field.

PROPOSAL: In section **1.11.2 Active Travel,** remove the following words from paragraph 1: "not only facilitate leisure and recreational use but"

RATIONALE: Referencing recreation within active travel is inappropriate and does not align with modern thinking on the development of active travel modes.

PROPOSAL: Modify TR 99 as follows: Remove the word "more" in the opening sentence

RATIONALE: At present, there is no usable network of cycle infrastructure in the town.

PROPOSAL: Modify TR 100 as noted above.

RATIONALE: The Tralee Transportation Strategy 2011 is out of date and the drawings contained therein do not reflect current best practices.

PROPOSAL: Modify TR 102 to indicate that the route should provide connectivity for residential areas along the route. The following wording should be inserted: "The cycle path should ensure residential areas abutting the route have high quality, accessible access to the route."

RATIONALE: Such a linkage is required to connect MTU to Blennerville, but it must also include residential areas along the route.

PROPOSAL: Modify TR 107 to include reference to cycle infrastructure as well as greenways by inserting: ", cycling infrastructure and cycle ways." at the end of the existing sentence.

RATIONALE: Greenways are but one type of active travel infrastructure.

PROPOSAL: In section **1.11.3 Roads & Infrastructure, Roads & Infrastructure Objectives, TR 110** should be modified as follows: remove the word "sustainable".

RATIONALE: Road development is not sustainable. The development of roads infrastructure induces demand and increases the number of vehicles used.

2. Killarney

2.1 Introduction & Context

PROPOSAL: Add an objective, "Ensure that the biodiversity and the temperate rainforest ecosystem of Killarney National Park, as a UNESCO Biosphere Reserve and as part of both a Special Area of Conservation and a Special Protected Area, are conserved and enhanced."

RATIONALE: Killarney Nation Park is one of the last remaining temperate rainforests in Europe, and its significance and value is clear from its designation as a UNESCO Biosphere Reserve, as well as being part of both a Special Area of Conservation and a Special Protected Area. It is also a key attraction for tourists to Killarney. In recent years, rapidly expanding rhododendron infestations and a devastating fire have significantly degraded the value of certain areas of the park, and it is critical that work is done to undo this damage and to prevent such damage occurring in the future. While KA 4 refers to the National Park and conservation objectives, this statement is not nearly strong enough if one considers the importance of the National Park both for Killarney. There should be an explicit objective in Killarney plan to conserve and enhance the biodiversity and temperate rainforest ecosystem of the park, in addition to any objectives in volume one.

2.3 Climate Action

PROPOSAL: Change KA 16, "Protect and improve air quality in the Town, especially in relation to reducing particulate matter", to "Protect, improve, monitor, and publicize the air quality in the Town, especially in relation to reducing particulate matter"

RATIONALE: It is important to monitor air quality to ensure progress is being made, and to also show residents whether the measures taken are improving air quality, to ensure buy-in from residents and maintain transparency.

PROPOSAL: Add an objective "Retrofit council-owned buildings, and conduct awareness campaigns to provide information to residents regarding the benefits of retrofitting, how retrofitting works, the types of retrofits appropriate for different types and ages of homes, and how to apply for grants etc."

RATIONALE: Retrofitting large volumes of buildings and homes is a key action of the 2021 Climate Action Plan, and the local authority should lead the way in raising awareness around retrofitting and its benefits. It should also set an example by initiating retrofits of council-owned buildings.

PROPOSAL: In section 2.3.4 Natural Heritage, add an objective: "For every tree in the Killarney area that is removed by the council, at least ten native trees must be planted as replacements."

RATIONALE: Trees (particularly native trees) have well-document benefits for both the health of communities, the atmosphere of a locale, biodiversity, and climate action. There are legitimate reasons why on occasion trees may need to be removed; this policy point would ensure that in such circumstances additional trees are planted to make up for the loss of a mature tree.

2.4 Urban Regeneration

PROPOSAL: Add an objective, "Provide outdoor covered seating facilities in the town centre (for example, in the 'car park' area between High Street, New Market Lane, Bohereencael Glebe, and Old Market Lane Square – see the proposal below in the Opportunity Sites section) similar to what has been set up at Prince Street in Cork City, not only for the purpose of outdoor dining but also to provide a place for residents and visitors to sit outside in shelter to socialize, all the while enhancing the atmosphere of the town."

RATIONALE: There is a dearth of outdoor seating facilities in the town centre, and such facilities would likely enhance the atmosphere of the town, which is a key aspect of urban regeneration. In particular, this proposal would align with objective five of the Killarney Town Strategic Objectives: "Ensure that the town is attractive, liveable, vibrant, and a well-designed urban place…" While the proposal gives the area near the Glebe as an example, this area could of course be used for other purposes, but in such a case another suitable area should be endeavoured to be found.

PROPOSAL: Add an objective, "On lands owned by the council, grass should be cut infrequently to increase biodiversity and to show leadership in taking steps, however small, in tackling the biodiversity crisis".

RATIONALE: The government declared a biodiversity emergency in 2019, and it would be entirely appropriate for the local authority to show leadership in Killarney by taking steps to enhance biodiversity. While KA29 refers to working with stakeholders regarding grassland management, it is important to include an explicit policy point regarding the council own actions regarding council-owned land.

2.5 Sustainable Land Use Development

PROPOSAL: The 'Glebe Craft Quarter' proposal, or similar proposals aimed at making better use of this space, should be included in the Opportunity Sites section. Thus, the following column should be added:

High Street, New Market Ln, Bohereencael Glebe, Old Market Ln square		¼ **acre**	Replace the car park with a covered outdoor seating area available to customers of nearby restaurants, cafes, and general visitors, or as suggested elsewhere in the plan, a 'craft quarter.'	**M1, M2, G1**

RATIONALE: This area in the town centre is completed wasted at present, only ever holding a few cars in a run-down car park. The removal of the car park would have negligible negative consequences to the few that park there, and the addition of an open-space, covered seating area would be attractive for visitors, encourage eating in Killarney, and act as a social meeting space. This regeneration project should be a key priority for Killarney and is likely of greater importance that the 'Green Lane/Pond Lane' site, and the 'Ballcasheen Road Junction' site. Not including this as an opportunity site suggests that there is no serious intent to regenerate this area. Regardless of whether a craft quarter or otherwise deemed most appropriate for the site, its regeneration is a must.

PROPOSAL The old Sara Lee site should be explicitly included in the opportunity site table, and plans (potential or actual) for the site should be explicitly stated in the development plan. Such plans could include the building of social housing (as was talked of last year), development of a remote working hub, or provisioning to MTU, for example.

RATIONALE: While the plan states that the Sara Lee site is an opportunity site, it is not listed in the table and there is very little detail on the plans for this site. As stated in an article in The

Independent ([High hopes for old Sara Lee site - Independent.ie](#)) from 2005 – over 15 years ago – the then president of Killarney Chamber of Tourism and Commerce called on Killarney Town Council to make maximum use of the site of the former Sara Lee and Pretty Polly factories. Since then, nothing has happened to this very large site on the edge of the town. It has lain idle for over fifteen years. Unless this site is given a significant place in the development, it is difficult not to be pessimistic that the next six years will be a continuation of the previous fifteen. While the plans to build social housing on part of the site earlier in 2021 were welcome, such plans should be included in the development plan. In addition, more ambitious should be sought to fully utilize this space, and not to only regenerate part of the site.

2.6 Retail

PROPOSAL: Add an objective, "Facilitate the revitalization of the Outlet Centre, and additional use of the upstairs space."

RATIONALE: The Outlet Centre is currently underutilized, despite it being one of the largest open-space buildings in Killarney open to the public. Options should be explored to enhance its usage.

PROPOSAL: Add an objective, "Encourage and support food-sellers to reduce food waste by utilizing apps such as 'Too Good to Go' or by coordinating between food-sellers and charities, and to reduce packaging waste through offering food refill options (such as in Beech Road's 'Going Green' shop)."

RATIONALE: Food waste is contributor to climate change, due the greenhouse gases that are unnecessarily emitted when producing the wasted foods. There are now simple yet highly effective technologies available, such as the app 'Too Good to Go,' that could be used by Killarney food sellers to reduce waste significantly, all the while offering fresh food to residents at reduced prices. The local authority should show leadership in working with the Chamber of Commerce and business to raise awareness around the problem of food wasted and guide business in how to work together to solve the issue.

PROPOSAL: Add an objective, "Facilitate and support local food markets and offerings such as the NeighbourFood Killarney Market and the Killarney Fruit and Veg Market in Fairhill car park."

RATIONALE: There is a growing demand for locally produced food, not least for the high-quality of such foods. Many people have a desire to support local farmers and businesses rather than very large multinational that thrive on offering convenience to consumers. Local food producers often cannot compete with such large multinationals, and often require support to both market and sell their foods. The local authority should work with the chamber of commerce and food producer to support local food producers and offer them a space to market and sell their goods directly through the public. This would also be a way of supporting local farmers who are in a position to sell their produce direct to market. A thriving town market would also greatly enhance the atmosphere of the town.

2.8 Tourism

PROPOSAL: Add an objective: "Ensure the protection of the biodiversity and tourism-value of Killarney National Park by proactively engaging with all stakeholders to tackle the critical problem of the expanding Rhododendron infestation, by promoting awareness of the importance of not starting fires anywhere within or near the National Park, by proactively investigating and acting upon any cases of illegal fires including gorse fires, and undertaking all necessary measures to ensure the thriving of one the last remaining temperate rainforests in Ireland."

RATIONALE: As stated above, Killarney Nation Park is one of the last remaining temperate rainforests in Europe, and its significance and value is clear from its designation as a UNESCO Biosphere Reserve, as well as being part of both a Special Area of Conservation and a Special Protected Area. It is also a key attraction for tourists to Killarney. In recent years, rapidly expanding rhododendron infestations and a devastating fire have significantly degraded the value of certain areas of the park, and it is critical that work is done to undo this damage and to prevent such damage occurring in the future. While KA 4 refers to the National Park and conservation objectives, this statement is not nearly strong enough if one considers the importance of the National Park both for Killarney. There should be an explicit objective to conserve and enhance the biodiversity and temperate rainforest ecosystem of the park.

PROPOSAL: Add an objective: "Advocate for the return of the Annals of Innisfallen to Ireland, preferably to Killarney or a least Kerry, to provide an additional tourism attraction to the town, to enhance the experience of those seeing the Annals, and to highlight the historical and cultural significance of Innisfallen Abbey."

RATIONALE: Monasteries thrived in Ireland during the Early Middle Ages, and they played a critical role in the preservation of pre-Medieval Hellenic, Latinate and European history and culture. The Annals of Inisfallen is an incredibly significant text that chronicles the medieval history of Ireland. It has resided in the Bodleian Library in Oxford for some time, and it is long past time when it was returned to Killarney, where alone it can be appreciated as an indigenous cultural and historical text. Its presence in Killarney would present an additional tourist attraction, complimenting the existing scenic attractiveness of the town.

2.11 Transportation

PROPOSAL: Add an objective, "Provision increased numbers of bike racks throughout the town to encourage active travel."

RATIONALE: There are insufficient bike racks at present, which likely discourages many residents and visitors from cycling in town to do shopping etc. Increased active travel is key for meeting the second goal of the KCDP, transitioning to a low-carbon society.

PROPOSAL: Add an objective, "Implement higher parking fees for SUVs due to the additional space they take up and the additional air pollution attributable to them."

RATIONALE: Killarney has a compact town centre with narrow streets. SUVs take up significant space, and generally emit more fumes that non-SUVs, so their use in the town centre should be discouraged to ensure Killarney remains a healthy and living town.

PROPOSAL: Add an objective, "Not to undertake the building of new roads to alleviate traffic due to the risk that new roads will increase instead of decrease private vehicle traffic volume overall due to a more attractive road infrastructure. Improved active travel infrastructure should be provided instead."

RATIONALE: It is known that in many cases the creation of new roads does not alleviate traffic but actually increases traffic congestion due to the additional new road infrastructure being more attractive to drive. Additional roads also take up significant space, and this method of attempting to reduce congestion is not sustainable in the long run.

PROPOSAL: Add an objective, "Cycling infrastructure should be sufficiently protected and designs should accord with the latest cycling infrastructure design standards."

RATIONALE: It is not sufficient to simply create more bike lanes etc. when developing cycling infrastructure. There is significant difference in quality between a well-designed and a poorly designed cycling plan, and it is key that cycling is made as safe and attractive as possible to ensure the benefits from active travel accrue to Killarney and its residents.

PROPOSAL: Add an objective: "Develop protected cycling infrastructure within a least a kilometre of all schools within the Killarney region to encourage active travel school journeys."

RATIONALE: MaREI centre research ([Microsoft Word - How and Why We Travel – Mobility Demand and Emissions from Passenger Transport - MaREI Template.docx](#)) has shown that companion/escort journeys (such as dropping off children to school) have the highest emissions intensity by journey purpose, and comprise over one tenth of all journeys in Ireland.. Providing safe and accessible opportunities for children to cycling to school should decrease the volume of such journeys, increasing air quality, reducing congestion and dangerous driving at school locations, and encourage a healthier lifestyle for children.

End of Observations/Proposals

Thank you for taking the time to consider our submission. We look forward to engaging with the process throughout the forthcoming stages of the plan's lifecycle.

Yours Sincerely,

Green Party Kerry Branch