

## Tionól Réigiúnach an Deiscirt

Teach an Tionóil,  
Sráid Uí Chonaill,  
Pórt Láirge,  
Éire.  
X91 K256



## Southern Regional Assembly

Assembly House,  
O'Connell Street,  
Waterford,  
Ireland.  
X91 K256

Teil/Tel: +353 (0)51 860700 Facs/Fax: +353 (0)51 879887  
R-phost/Email: info@southernassembly.ie Idirlíon/Web: www.southernassembly.ie

Damien Ginty,  
Senior Planner,  
Planning Policy Unit,  
Kerry County Council,  
Rathass,  
Tralee,  
Co. Kerry

Date: 15<sup>th</sup> June 2022

### **Proposed Material Amendments to the Draft Kerry County Development Plan 2022-2028**

**SRA File Ref: 20/004**

A Chara,

I refer to your notice of the publication of Proposed Material Amendments to the Draft Kerry County Development Plan 2022-2028. The Southern Regional Assembly (SRA) welcome this opportunity to comment on the Proposed Amendments.

The SRA commend the continued work undertaken in the preparation of the Draft Plan. These observations are focused solely on the published material amendments and are intended to assist the Council in achieving successful alignment of the County Development Plan with the Regional Spatial and Economic Strategy (RSES) and National Policy Objectives.

#### **Chapter 2: Climate Action & Achieving a Sustainable Future**

**Proposed Amendment 2.1** addresses Recommendation 1 of the SRA's submission to the Draft Plan seeking support for initiatives with the Climate Action Regional Offices (CAROs), particularly the Atlantic Seaboard South CARO, to assist implementation of Development Plan policies and objectives for climate action mitigation and adaptation. Accordingly, new text is proposed in support of the Atlantic Seaboard South CARO and a commitment to coordinate with the CARO in order to deliver climate action at a local level. Further, **Proposed Amendment 2.11** provides a specific objective to collaborate with the Atlantic Seaboard South Climate Action Regional Office (CARO) to assist implementation of Development Plan

policies and objectives for climate action mitigation and adaptation; and to achieve the climate action policies and objectives set out in the Southern Region RSES.

These amendments are supported and aligns with Regional Policy Objectives (RPOs) 88 and RPO 90 in support of the Region's transition to a low carbon, climate resilient future and in support of regional decarbonisation.

**Proposed Amendments 2.4, 2.5 and 2.7** address Recommendation 10 of the SRA's submission to the Draft Plan and strengthen objectives KCDP 2-4, KCDP 2-5 and KCDP 2-10 for implementation of integrated nature-based design solutions and protecting biodiversity. Further, **Proposed Amendment 2.13** inserts a new objective to actively implement measures detailed in the 'Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas' Guidance.

These amendments are supported and align with RSES RPOs 124 and 126 for green infrastructure and biodiversity. The amendments also actively support an initiative under RSES implementation to set a framework for Blue Green Infrastructure and Nature Based Solutions implementation across the Southern Region under the EU Interreg Europe Blue Green Cities Project: <http://www.southernassembly.ie/eu-projects/blue-green-city>

### Chapter 3 Core and Settlement Strategy

Regarding clarifications under the Core Strategy, the SRA note:

- **Proposed Amendment 3.9** inserts additional columns to Table 3.7 Population and Housing Growth 2022-2028 for Land Zoning Required. The existing land zoning and required land zoning to meet targets are identified for Tralee, Killarney and Listowel, informed through a Settlement Capacity Audit undertaken and documented in Volume 2 of the plan.
- **Proposed Amendment 3.11** states it is proposed to phase residential lands in Tralee and Killarney in order to meet the housing targets of these settlements allowing for the contribution of brownfield/infill sites and to reflect the tiered approach to zoning.
- For other settlements categorised as Regional Towns and District Towns, the existing land zoning is indicated but the required zoning is not yet determined and will be subject to a Settlement Capacity Audit undertaken at the Local Area Plan Stages.
- **Proposed Amendment 3.12** provides a new objective to prepare a Settlement Capacity Audit for each Regional Town and District Town where lands are zoned residential in their respective Local Area Plan which shall inform the zoned land requirements for these settlements.

The proposed amendments in part address Recommendation 3 of the SRA's submission to the Draft Plan which recommended a strengthening of the Core Strategy tables to set details of areas already zoned for residential use and details of areas proposed to be zoned and phased for residential use.

The preparation of the Settlement Capacity Audit and application of that evidence base to inform zoning for settlements under Local Area Plans must comply with the principles of achieving Compact Growth under RSES RPO 35, follow the guiding principles under RSES Section 3.3 A Tailored Approach and comply with National Policy Objectives 72 a-c to

differentiate between zoned lands that are serviced, serviceable within the life of plan and lands which cannot be serviced.

Regarding the allocation of growth to Key Towns and Regional Towns, the SRA's observations on the Draft Plan noted priority to Key Towns to drive the County's population and economic growth .

Within the Regional Town category, it was noted the growth rate for some Regional Towns records a similar, and in some cases higher, percentage change in population and average growth per annum 2016-2028, compared to Key Towns. Recommendation No 4 of the SRA's submission sought a review of growth rates assigned for Regional Towns in the context of required level of services, employment and infrastructure to service growth and to support the primary role of Key Towns.

The Council have addressed this as follows:

- **Proposed Amendment 3.10** inserts a clarification that the allocation of population/housing has generally followed the scale of proportionality of existing settlement scale. Some towns have been allocated increased levels of growth relative to other towns in that category. This has been done to ensure a balance between social and private development in these settlements due to Kerry County Council's housing programme. There are also some capacity issues in relation to wastewater infrastructure and these settlements have been allocated a housing target that reflects this capacity.

The SRA welcome the clarification. Noting the important focus on regenerating rural towns and villages and objectives of the plan to restrict urban generated rural housing in the countryside, the SRA support the principles of the settlement hierarchy and note the allocation of Key Towns (46% of the population allocation) is greater than the combined rate for Regional Towns (25%) and District Towns (8%).

As noted above, it is required that rates of growth within specific regional towns is evidence based and infrastructure led. The preparation of the Settlement Capacity Audit and application of that evidence base to inform zoning for settlements under Local Area Plans must comply with the principles of achieving Compact Growth under RSES RPO 35, follow the guiding principles under RSES Section 3.3 A Tailored Approach and comply with National Policy Objectives 72 a-c to differentiate between zoned lands that are serviced, serviceable within the life of plan and lands which cannot be serviced.

Regarding descriptions under the settlement typology, **Proposed Amendment 3.8** addresses Recommendation No 6 of the SRA's submission to the Draft Plan and clarifies that Key towns have significant influence in a regional and sub regional context and Regional Towns service a local region within the County. This amendment is welcomed and aligns to RSES Table 3.2 Settlement Typology and Section 3.3 A Tailored Approach.

Under Recommendation 7 of the SRA's submission to the Draft Plan, a strengthening of the Development Plan's commitment to inter-urban networks to progress from RSES RPOs 28-30 was recommended. Accordingly, the SRA welcome the following additions;

- **Proposed Amendment 3.5** commits to the potential for innovative projects, collaboration between stakeholders and sectors, infrastructure projects
- **Proposed Amendment 3.6** strengthens support for the North Kerry/Shannon Estuary Network as a driver for economic growth within the County and Region. There is potential for innovative projects, collaboration between stakeholders and sectors, infrastructure projects (including multi-modal transport infrastructure, more frequent public transport services and digital connectivity) to/ from and within the network to unlock the strengths and opportunities. This includes the County's Regional Town of Listowel, Ballybunion and support for economic interaction with the AEC, Strategic Development Sites in the Shannon Estuary , the Kerry Hub and Knowledge Triangle and cross county boundary connectivity to other settlements including Newcastle West in Limerick as a Key Town, Port of Shannon Foynes and the Limerick -Shannon Metropolitan Area.
- **Proposed Amendment 3.7** commits to the strategic opportunity of Kerry International Airport within the Kerry Hub Knowledge Tringle

## Chapter 4 Towns and Villages

**Proposed Amendment 4.1** strengthens Objective KCDP 4-1 to deliver actions under Housing for All, regenerate towns and villages and tackle dereliction. Further, Proposed Amendment 4.4 inserts a new objective to monitor the implementation of compact growth.

These amendments are supported and addresses Recommendation 2 of the SRA's submission to the Draft Plan seeking a strengthened commitment to compact growth in all settlements and aligns with RSES RPOs 34 Regeneration, Brownfield and Infill Development, RPO 35 Support for Compact Growth and RPO 36 Land Development Agency.

**Proposed Amendment 4.12** gives support to the County's Regional Towns in their connections to the Key Towns and role in Inter-Urban Networks. This amendment is supported and is a complement to additions for inter-urban networks in Chapter referenced above delivering for RSES RPOs 28-30.

**Proposed Amendment 4.5** inserts a new objective to Facilitate and support Language Plans of the County for Bailte Seirbhíse Gaeltachta - Daingean Uí Chúis, Tralee and Cahersiveen. This new objective is supported and aligns with RSES RPOs for the economic development and protecting and enhancing the cultural heritage of Gaeltacht areas and service towns including RPOs 195 Language Plans, RPO 196 Gaeltacht and 197 Irish Language Networks.

## Chapter 5 Rural Housing

**Proposed Amendment 5.11** addresses Recommendation 5 of the SRA's submission to the Draft Plan which had sought use of the GIS data and mapping analysis under Appendix 8 of the Draft Plan to underpin Rural Housing Objectives KCDP 5-12 to 5-14. Accordingly, Map 5.1 Rural Area Types is now updated to apply the evidence base for identifying rural areas under significant urban influence. This is supported and aligns with RSES RPO 27 Rural.

## Chapter 6 Sustainable Communities

The SRA welcome and support the following amendments in support of strengthened community infrastructure and services that promote enhanced quality of life for inclusive communities through the Development Plan and align with RSES RPOs 175-181:

- **Proposed Amendment 6.5** inserts a new objective in support of the provision of Multi-Use Community Facilities which encourage sharing amongst community groups and are designed for multi-use activities and future sharing.
- **Proposed Amendment 6.6** inserts new text in support of Comhairle Na nÓg, and initiatives of the Department of Children and Youth Affairs (DCYA).
- **Proposed Amendment 6.7** inserts new text stating the council recognises the need to maximise opportunities for play facilities for children both within the natural and built environment, at appropriate locations. The Kerry Play & Leisure Policy will be revised in 2022 and the County Development Plan will support the implementation of same.

The SRA also note and support the following proposed amendments for the development and implementation of language plans in the Gaeltacht areas which align with RSES Section 7.2.3 The Gaeltacht and Linguistic Heritage and Section 7.2.4 Economic Development in the Gaeltacht (RSES RPO 195 Language Plans and RPO 196 Gaeltacht):

- **Proposed Amendment 6.11** inserts strengthened text for Acht na Gaeltachta 2012 and commits the Council's support to the Irish language and facilitating the implementation of language plans in Gaeltacht Language Planning Areas, and Bailte Seirbhíse Gaeltachta (BSG) of Tralee, Dingle and Cahersiveen. It is recognised that these towns which are situated in or adjacent to Gaeltacht Language Planning Areas have a significant role in providing public services, recreational, social, and commercial facilities for Gaeltacht areas.
- **Proposed Amendment 6.12** inserts a new objective to facilitate and support Language Plans of the County for Bailte Seirbhíse Gaeltachta - Daingean Uí Chúis, Tralee and Cahersiveen, to achieve their target of increasing the number of daily Irish Speakers.

## Chapter 8 Gaeltacht Areas, Culture and Heritage

The SRA support the following strengthened provisions which, as noted above for Chapter 6, align with RSES RPO 195 Language Plans and RPO 196 Gaeltacht:

- **Proposed Amendment 8.5** which inserts a new section in support of Straitéis 20 Bliain Don Ghaeilge 2010-2030 (20 Year strategy for the Irish language).
- **Proposed Amendment 8.9** which updates Objective KCDP 8-6 to facilitate and support Language Plans of the County including Tobar Dhuibhne, Plean Teanga Chiarraí Thiar (2018), Dúchas an Daingin - Plean Teanga for Bhaile Seirbhíse Gaeltachta Daingean Uí Chúis and Brí Uíbh Ráthaigh - Plean Teanga Chiarraí Theas 2019-2026, to achieve their target of increasing the number of daily Irish Speakers, long term in Gaeltacht areas

The SRA also support **Proposed Amendment 8.19** stating the Council will continue to support and promote Dingle's Smart Village status, which aligns with RSES RPO 134 Smart Cities and a Smart Region.

## Chapter 9 Economic Development

**Proposed Amendment 9.3** strengthens Objective KCDP 9-3 to support training and upskilling to develop employment opportunities for rural communities in areas such as renewable energy, sustainable tourism, energy retrofitting, the Bioeconomy and the Circular Economy. In addition, the following amendments are also noted:

- **Proposed Amendment 9.8** amends Objective KCDP 9-6 in support of collaboration with Regional Partners [including the Regional Skills Forum South-West], Local Authorities, Third Level Education Sector, the Kerry College of Further Education and the Kerry Education and Training Board to promote the continued development of the Kerry economy on a regional basis.
- **Proposed Amendment 9.13** inserts a new objective to support the role of the Munster Technological University as a driver of the regional economy and key stakeholder for a Learning Region through support for funding to the higher and further education training sectors and delivery of recommendations under a forthcoming Learning Region Strategy for the Southern Region.

These amendments are supported and address Recommendation 9 of the SRA's submission to the Draft Plan to strengthen objectives in support of regional knowledge diffusion. The amendments align with RSES Section 7.1.9 for Skills and Talent and RPOs 186-190 for life-long learning, education and skills development for a resilient and knowledge based regional economy. These commitments also align with the SRA's initiative under RSES implementation "Towards a Learning Region".

The following amendments are a further strengthening of the Development Plan's commitment to economic growth and collaboration between inter-urban networks (addressing SRA's Recommendation 7 to the Draft Plan) and are supported to deliver for RSES RPOs 28-30):

- **Proposed Amendment 9.4** adds text supporting the potential for innovative projects, collaboration between stakeholders and sectors, infrastructure projects (including multi-modal transport infrastructure, more frequent public transport services and digital connectivity) to/ from and within inter-urban networks of Kerry Hub & Knowledge Triangle and the North Kerry/ Shannon Estuary to unlock strengths and opportunities.
- **Proposed Amendment 9.5** amends objectives in support of North Kerry/ Shannon Estuary supports the development of connections, collaborations and innovative projects between settlements and employment locations within the network.
- **Proposed Amendment 9.9** inserts within Objective KCDP 9-8 a commitment to drive collaborations within the Kerry Hub & Knowledge Triangle and the North Kerry/ Shannon Estuary Networks to create economic benefits.
- **Proposed Amendment 9.13** adds in support of the Shannon Integrated Framework Plan (SIFP) stating the SIFP is a driver for economic growth within the County and Region. There is potential for innovative projects, collaboration between stakeholders and sectors, infrastructure projects to/ from and within the network to unlock the strengths and opportunities of the SIFP.

**Proposed Amendment 9.12** responds to the SRA's Recommendation 9 to the Draft Plan which sought an integration of sustainable guiding principles for designating employment zonings under the Development Plan and to draw from RSES Section 4.7 Placemaking for

Enterprise Development, RPO 62 Locations for Enterprise Development and RPOs 151 and 152 for integrating locations for employment with public transport services and active travel.

**Proposed Amendment 9.18** addresses Recommendation No 9 of the SRA's submission to the Draft Plan to support RSES implementation of a Regional Approach to Smart Specialisation. Accordingly, Objective KCDP 9-34 is amended and supported where it includes the SRA's Smart Southern Region Definition and Framework. This amendment aligns with RSES Section 4.2 The Economic Strategy and RPOs 51, 64-67.

Further, the amendment commits to implementing the forthcoming Southern Region Framework for GBI and NBS for the under the Interreg Europe "Blue Green Cities" project and support the development of a County level GBI and NBS framework. This inclusion is welcomed as GBI and NBS enhance placemaking for enterprise creation and addresses SRA's Recommendation 10 to the Draft Plan to support Regional and Local Authority Frameworks for GBI and NBS.

## **Chapter 11 Environment**

The SRA welcome and support the following proposed amendments which strengthen the commitment to the implementation of nature-based design solutions, green infrastructure and protection and enhancement of biodiversity through the Development Plan in alignment with RSES RPOs 122, 124 and 128:

- **Proposed Amendment 11.4** inserts a new objective to facilitate and support the protection and enhancement of wetlands as nature-based solutions to flood management, climate change, and the biodiversity crisis.
- **Proposed Amendment 11.5** amends text stating as part of the councils commitment to biodiversity and Climate Change, Kerry County Council is seeking to return more open grassed areas such as grass verges along roads, sections of public parks etc. for natural biodiversity areas and to encourage natural wildflowers and pollination.
- **Proposed Amendment 11.6** inserts a new objective to support the management of appropriate green areas to become natural biodiversity areas to encourage natural wildflowers to recolonise and support enhanced bee and insect populations.

As noted in amendments to Chapter 2 Climate Action & Achieving a Sustainable Future, the amendments also actively support an initiative under RSES implementation to set a framework for Blue Green Infrastructure and Nature Based Solutions implementation across the Southern Region under the EU Interreg Europe Blue Green Cities Project.

The SRA also welcome and support the following proposed amendments which strengthen objectives for flood risk management in alignment with RSES RPOs 113-119:

- **Proposed Amendment 11.11** amends text to stating the redevelopment of existing sites and undeveloped infill sites should take into consideration the identified and mapped flood risk in any design proposal. Development proposals in relation to these sites should seek to avoid the identified flood risk areas or if not possible ensure that the flood risk is not increased for adjacent properties and consider flood resilient or flood resistant construction design methodologies.
- **Proposed Amendment 11.12** amends text to state the Council will have full regard to the development of proposed Flood relief schemes and ensure that zoning or development proposals support and do not impede or prevent the progression of these measures.

- **Proposed Amendment 11.15** inserts a new objective to ensure that zoning or development proposals support and do not impede or prevent the progression of flood relief schemes throughout the county.

## Chapter 12 Energy

Proposed Amendment 12.5 inserts a new objective supporting hybrid energy systems and/or co-location of renewable energy where applicable. Proposed Amendment 12.6 provides additional text stating it is estimated that the Draft County Development Plan provides the framework for approximately 389MW of additional renewable energy to be generated over the lifetime of the plan with estimated generation and support for Hydro power, Solar Power and Bioenergy. Two further new objectives are also noted:

- **Proposed Amendment 12.10** inserts a new objective to facilitate and promote alternative forms of renewable energy including hydro, micro, solar and offshore wind energy.
- **Proposed Amendment 12.11** inserts a new objective stating during the lifetime of the Plan, Kerry County Council seeks to prepare a Renewable Energy Strategy for the County inclusive of targets across renewable energy sources, including the potential for offshore renewables, bioenergy, solar etc.

The SRA support these amendments which address Recommendation 11 of the SRA's observation to the Draft Plan in support of renewable energy generation across different sources under which the County has significant potential and for a Renewable Energy Strategy. It is important that the new objective to undertake the preparation of a Renewable Energy Strategy for the County is time-bound, within one year of the adoption of the Development Plan for example, to address the urgency of Climate Actions under the Climate Action Plan 2021 (increase the proportion of renewable electricity to up to 80% by 2030). The amendments and this further strengthening is supported by RSES RPOs 95-104 for Renewable Energy and RPO 98 Regional Renewable Energy Strategy.

**Proposed Amendment 12.8 and 12.23** support community and local based wind and renewable energy projects in areas not deemed suitable for commercial wind farm development and in areas outside of those zoned open to consideration or repower areas, subject to planning and environmental assessments. The SRA welcome this inclusion which aligns with RSES RPO 221 Renewable Energy Generation and Transmission Network which supports strengthened local /community renewable energy networks and micro renewable energy generation.

The SRA note proposed amendment regarding wind energy:

- **Proposed Amendment 12.9**, which amends 12.5.4.1.4 Open-to-Consideration stating that having regard to County Kerry's current contribution to the provision of wind energy generation capacity in the State, the scale of this contribution and the scale of permitted, but not as yet constructed development, it is considered that the capacity of certain areas in the County to facilitate additional wind energy developments has been reached.

It is critical to achieve the Climate Action Plan targets for renewable energy and the contribution of wind energy and repowering areas is an essential contributor to achieve these targets. Additionally, wind energy is necessary to achieve our net zero future and to achieve objectives for a lower carbon future through the Development Plan, principally Chapter 2



Climate Action & Achieving a Sustainable Future. It is important in the final determination of the Development Plan that full regard is taken for the evidence base (including Wind Zoning Methodology under Volume 1 Appendix 6) which takes into consideration the Draft Revised Wind Energy Development Guidelines (DHPLG 2019) and Methodology for Local Authority Renewable Energy Strategies (SEAI 2013). Material amendments, where they deviate from the evidence base and national guidelines to facilitate renewable wind energy, are not supported.

## Chapter 13 Water and Waste Management

The SRA note and welcome the following proposed amendment which integrates nature-based design solutions and green infrastructure in planning for water and wastewater infrastructure in accordance with RSES objectives RPO 124 and 126.

- **Proposed Amendment 13.1**, strengthening Objective KCDP 13-16 to facilitate and support Irish Waters Investment Plan 2020-2024 and Small Towns and Villages Growth Programme (STVGP) and any other successor capital plans/ strategies in the county, including the consideration of Integrated Constructed Wetlands (ICW), at appropriate locations, which have the added benefits of providing any amenity area for the public and enhance biodiversity

The following amendments which strengthen support for waste reduction and the circular economy are also supported and align with RSES RPOs 107-108:

- **Proposed Amendment 13.2** to follow guidance under the upcoming National Waste Management Plan for a Circular Economy (NWMPCCE).
- **Proposed Amendment 13.4** in support of smart technologies and innovative approaches to waste management which promotes waste prevention and increased reuse, recycling and recovery of waste, with additional environmental and economic benefits.

## Chapter 14 Connectivity

**Proposed Amendment 14.1** strengthens commitment to facilitate the use of sustainable modes and patterns of transport, including electric vehicles including the extension of charge point infrastructure to deliver a comprehensive network of public and domestic charge points accessible to all supply companies and all types of electric cars. This amendment is supported and aligns with RSES RPOs 92-93 for Electric Vehicle Infrastructure and RPOs 160-161 for Sustainable and Smart Mobility.

**Proposed Amendment 14.2** addresses Recommendation 8 of the SRA's submission to the Draft Plan and strengthens Objective KCDP 14-1 to deliver sustainable transport infrastructure investments as identified for the road network, public/rural transport, and walking/cycling infrastructure to facilitate and realise the 10-minute town concept. Further, Proposed Amendment 14.7 provides a new objective to incorporate 10-Minute Town concepts in Local Area Plans and Local Transport Plans. These amendments are supported and align with RSES RPOs 157 Local Transport Plans, 160 Smart and Sustainable Mobility and RPO 176 10 Minute City and Town Concepts.

Many amendments positively correct the terminology for Local Transport Plans (LTPs), commit to LTP preparation, commit to modal change targets informed by LTPs and for the Council to lead on these plans in consultation with the NTA. These amendments address

Recommendation 8 of the SRA's submission and are supported in alignment with RSES RPO 157 Local Transport Plans, RPO 160 Smart and Sustainable Mobility and RPO 163 Sustainable Mobility Targets:

- **Proposed Amendment 14.5** amends Objective KCDP 14-5 to state that baseline figures and targets for modal share in new / varied Local Area Plans will be informed by the preparation of local transport plans to encourage a modal shift away from the private car.
- **Proposed Amendment 14.9** amends reference in Objective KCDP 14-10 from Transport Mobility Plans to Local Transport Plans for Tralee, Killarney and Listowel and the subsequent rollout of Active Travel related infrastructure in these towns.
- **Proposed Amendment 14.13** amends text so that all references to 'Tralee and Killarney Transport Strategy and Mobility Plan' are to be amended to 'Tralee or Killarney Local Transport Plan'.
- **Proposed Amendment 14.16** amends Objective KCDP 14-22 to prepare LTPs for the Key Towns, in consultation with the NTA and other settlements where appropriate, which shall be aligned to and integrated with relevant Local Area Plans within two years of adoption of the plan.
- **Proposed Amendment 14.35** amends Objective KCDP 14-47 to state the council will prepare a County Transportation Plan/Mobility Plan and Local Transport Plans, facilitated and supported by the NTA including the provision for an ongoing marketing plan.

Regarding Rural Transport, the SRA support the following amendments which align with RSES RPO 158 Intra Regional Rural Connectivity and RPO 172 Rural Transport:

- **Proposed Amendment 14.25** supporting the extension and expansion of the Rural Transport Programme and other such initiatives, which respond to local travel needs throughout the County and support for a County Transportation Plan.
- **Proposed Amendment 14.32** amending text stating the Council will work closely with TFI, Local Link Kerry, Bus Eireann {a range of rural community development groups} and allied stakeholders to identify and meet future bus transport requirements through the connecting Ireland initiative
- **Proposed Amendment 14.33** amending Objective KCDP 14-45 to facilitate and support the development and expansion of the Local Link Rural Transport Programme and support Connecting Ireland Rural Mobility Plan by the NTA.
- **Proposed Amendment 14.34** amending Objective KCDP 14-46 to facilitate improved rural public transport services , the Rural Transport Programme and Connecting Ireland Initiative and improved bus infrastructure including bus stops/shelters at appropriate locations and taking into consideration the recommendations of the Connecting Ireland process.

Regarding public transport and tourism corridors, the SRA support the following amendment which aligns with RSES RPO 173 Tourism Corridors and addresses Recommendation 8 of the SRA's submission to the Draft Plan:

- **Proposed Amendment 14.29** which provides a new objective to support and facilitate the sustainable development of public transport services and interchange facilities between transport modes servicing tourism destinations and along the Wild Atlantic Way.

**Proposed Amendment 14.28** is supported, creating a New Objective to support the preparation of a Regional Freight Strategy and to enhance connectivity on road and rail networks, to facilitate the movement of freight, in a sustainable manner. This amendment addresses Recommendation 8 of the SRA's submission to the Draft Plan and aligns with RSES RPO 141 Regional Freight Strategy.

**Proposed Amendment 14.41** is supported, creating a new objective to strength multi-modal connectivity and digital connectivity to, from and within the Inter Urban Networks of the Kerry Hub and Knowledge Triangle (including Kerry International Airport) and North Kerry/Shannon Estuary Network. Further, **Proposed Amendment 14.14** amends Objective KCDP 14-18 to enhance and improve regional connectivity through upgraded transport infrastructure and effective public transport services. This amendment addresses Recommendation 8 of the SRA's submission to the Draft Plan and aligns with RSES RPOs 28-30 for project collaboration and connectivity infrastructure within and between inter-urban networks and RPO 166 for multi-modal connectivity between the Region's metropolitan areas and along economic corridors.

The following amendments are supported, strengthening commitment to smart and sustainable mobility actions and for multi-modal travel integration in alignment with RSES RPOs 160-162:

- Proposed Amendment 14.8 inserts a new objective to support and promote initiatives that encourage Car Sharing/Car Pooling.
- Proposed Amendment 14.30, inserting next text in support of the Sustainable Interchange Programme under which Iarnród Éireann are developing a number of programmes such as Sustainable Interchange, Accessibility, Park & Ride Programme which will enable more sustainable end to-end journeys to be made by rail. The Sustainable Interchange Programme will include the provision of facilities within Iarnród Éireann's stations and local environs to provide for ease of interchange between rail and all other modes, prioritising those that are sustainable –cycling, electric charging, wayfinding, and shared mobility.
- Proposed Amendment 14.40, amending Objective KCDP 14-66 to develop Smart Towns/Villages as engines for a Smart County (urban and rural) by supporting the initiatives of the All-Ireland Smart Cities Forum, seeking good practices yielded through living labs, testbeds and investment in the initiatives of stakeholders as well as integrating smart mobility initiatives.

The SRA note **Proposed Amendment 14.31** inserts a new objective to rollout light rail transport in the key towns of Tralee and Killarney subject to a feasibility study. The principle of encouraging greater use of rail, lower carbon transport and more frequent public transport connections within and between towns is supported but the SRA would advise that the feasibility for light rail is informed by consultations with the NTA and built into the evidence base of LTP preparation and implementation within the Key Towns. The objective could have a further minor amendment to tie the feasibility assessment into the LTP process in consultation with the transport authority stakeholders.

## Conclusion

The SRA welcomes the publication of Proposed Material Alterations to the Kerry County Development Plan 2022-2028 and commend the Development Plan team for amendments which strengthen the content of the Development Plan, strengthen implementation of key

objectives which will deliver the objectives of the NPF and RSES and which have addressed the previous recommendations of the SRA to the Draft Plan.

These observations are provided to assist and demonstrate that strengthened alignment between the Draft Development Plan and RSES Strategy is being achieved through these proposed amendments.

The RSES team are available for further consultation and for any clarification required regarding this submission.

**Mise le meas**



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David Kelly

Director Southern Regional Assembly