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Kerry CDP Review,  
Planning Policy Unit,  
Kerry County Council,  
County Buildings,  
Rathass,  
Tralee,  
Co. Kerry.

20<sup>th</sup> August 2020

**Re: Review of the Kerry County Development Plan Pre-Draft Consultation  
SRA File Ref 20/004**

A Chara,

The Southern Regional Assembly (SRA) welcomes the publication of the Kerry County Development Plan 2022-2028 (KCDP 2022-2028) Pre-Draft consultation Issues Paper document and the opportunity to consult with the Council under Section 11 of the Planning and Development Act 2000.

The SRA makes this observation in accordance with Section 27 A of the Act which obliges the Regional Assembly to make submissions or observations regarding a number of matters including:

- Policies and objectives in relation to national and regional population targets.
- Distribution of residential development and related employment with a view to:
  - Promoting consistency as far as possible between housing, settlement and economic objectives of the Draft Plan, Core Strategy and RSES.
  - Assisting in the drafting of the Core Strategy of the Draft Development Plan.
- Objectives of providing physical, economic or social infrastructure in a manner that promotes regional development through maximising the potential of the Region.
- Planning for the best use of land having regard to location, scale and density of new development to benefit from investment of public funds in transport infrastructure and public transport services.
- Collaboration between the planning authority and the Regional Assembly in respect of integrated planning for transport and land use and the promotion of sustainable transport strategies in urban and rural areas.
- Promotion of measures to reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to Climate Change.

The opportunity to engage with Kerry County Council through the pre-draft phase of the process is also important in relation to Section 22 (A) (3) of the Act which requires that public bodies (including local authorities) consult with the regional assemblies, as appropriate, when preparing its own plans to ensure that they are consistent, as far as practicable, with national and regional objectives set out in the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES). Continued collaboration throughout plan development is welcomed.

The RSES was made on the 31<sup>st</sup> January 2020.

## **1.0 Overall Observation**

The SRA highly commends the approach taken by the Council through the publication of the Issues Paper. The SRA commend the quality of the publication and use of infographics to communicate key issues across themes. The core aims for the next Development Plan, the issues and potential direction for change are clearly set.

At this stage of the process, the SRA intend to outline high level points. Appendix 1 provides a summary of some of the key Regional Policy Objectives (RPOs) that support the themes raised in the Issues Paper.

The final RSES is available through the following link:

***<http://www.southernassembly.ie/regional-planning/regional-spatial-and-economic-strategy>***

## **2.0 Ensuring Consistency with the RSES**

Under Section 10 (1 A) of the Act, the development plan shall include a core strategy which shows that its development objectives are consistent, as far as practicable, with national and regional development objectives set out in the National Planning Framework, the RSES and with specific planning policy requirements specified in guidelines under subsection (1) of section 28. The following key areas are identified for attention.

Chapter 2 sets out the Strategic Vision and Strategy for the RSES. Section 2.2 The Strategy and the associated Strategy Statements and Key Enablers are particularly relevant including in the context of securing funding sources for the delivery of the Development Plan. The Strategy Statements, Regional Policy Objectives (RPO's) and MASP Objectives are aligned to the National Strategic Outcomes of the NPF.

Chapter 3 references the settlement strategy and I refer in particular to Section 3.2 (Sustainable Place Framework) and Section 3.3 – A Tailored approach and the settlement typology set out in Table 3.2 including:

1. Metropolitan Area Strategic Plans (MASPs) – Section 3.4,
2. Key Towns – Tralee and Killarney – Section 3.5
3. Towns and Villages – Section 3.6
4. Rural Areas – Section 3.7, and
5. Networks – Kerry Hub and Knowledge Triangle and North Kerry/Shannon Estuary Section 3.8.

The Core Strategy should reflect NPF and RSES priorities by supporting the critical role played by Kerry's Key Towns in underpinning the RSES and ensuring the consolidated spread of growth beyond the cities to the sub regional level.

Kerry has a strategic location context, located on the Atlantic Economic Corridor (AEC) and accessible to two cities and metropolitan areas of Cork and Limerick-Shannon for economic interaction, while performing a strong self-sustaining economic role. The unique regional context for Kerry is recognised in the Issues Paper where it states that Kerry, through its geographical location, has strong economic, educational, cultural and access links to both Limerick (Mid-West) and Cork (South-West).

The KCDP 2022-2028 needs to leverage Kerry's strategic role in the Southern Region located on the AEC and interacting with two MASP areas. The "Economic Development and Activity" and "Transport Connectivity" sections of the Issues Paper identifies the importance of strengthened connectivity (especially external linkages to Cork and Limerick) and digital connectivity to strengthen regional interactions which is welcomed. Regional support for policies in the KCDP 2022-2028 for interactions across economic drivers are provided in Appendix 1 under Transport and Connectivity.

The Key Towns (Tralee RPO 15 & Killarney RPO 18) play a critical role in underpinning the RSES and ensuring a consolidated spread of growth beyond the cities to the sub-regional level. While Local Authorities are supported in targeting growth of more than 30% in Key Towns subject to capacity analysis, it is important to note that the nature, scale and phasing of growth of each Key Town will be determined by Local Authorities through the Core Strategy.

The SRA welcome the emphasis placed on the role of Key Towns for the Region within the Issues Paper, placing Tralee and Killarney as Tier 1 settlements and supporting RSES objectives for both towns.

Through the RSES, Irish Water (IW) Investment Plans must align with the objectives and settlement strategy of the RSES and assist the strategic role played by Key Towns. Collaboration is required between IW and Local Authorities to agree phasing, water and waste water services to accommodate growth in a phased, sustainable manner.

Subject to capacity analysis, RSES Section 3.5 states that some Key Towns may justify significant growth while others may place a greater emphasis on strengthened services, facilities and economic roles.

Regarding Tralee and Killarney, RPOs 15 and RPO 18 are framed by the identification of strategic attributes and key infrastructure requirements specifically for each Key Town. The RSES supports both settlements in their Tier 1 role for the County. RPO 11 for all Key Towns is equally important for the KCDP 2022-2028, where it seeks investment in holistic infrastructure.

The distribution of growth across the County's other towns, villages and rural areas is a matter for the Development Plan to address. The important economic role of Killorglin and Listowel networking with the Key Towns in the Kerry Hub Knowledge Triangle and North Kerry/ Shannon Estuary Networks are supported at the Regional level through RSES Section 3.8.

The RSES seeks prioritisation in the growth allocation for settlements informed by guiding principles as set out under RSES Section 3.3. A Tailored Approach. These principles include:

- Existing scale of population, track record of performance, ambition and scope to leverage investment.
- Rate and pace of past development and extent to which there are outstanding requirements for infrastructure and amenities.
- Scale of employment provision, jobs to resident workers ratios and net commuter flows.
- An evidence base on the availability and deliverability of lands within existing built up footprints in the lifetime of the Development Plan (compliance with NPO 72 of the NPF).
- Extent of local services and amenities provided.
- Extent of sustainable modes of travel that can be encouraged.
- Accessibility and influence in a regional and sub-regional context.
- Accessibility as a service centre for remote and long-distance rural hinterlands.
- Environmental and infrastructure constraints.
- The appropriate density and scale of development relative to the settlement and location.
- Need for attractive, alternative options to rural housing within smaller towns and villages.

In addition, RPO 3 and RPO 26 refer to the need to 'identify settlements which can play a role at a sub-regional level to drive the development of their areas'.

The KCDP 2022-2028 will need to demonstrate priorities based on the above RSES requirements and principles. In setting out the Development Plan Core Strategy to 2028, adherence to NPO 72 (a) to 72 (c) will be required to differentiate between zoned land that is serviced and zoned land that is serviceable within the life of the plan. When considering zoning lands that require investment in service infrastructure, planning authorities are required to include the reasonable cost estimates of delivering required services at both the draft and final plan stages.

### **3.0 Achieving Compact Growth Targets**

To achieve the National Strategic Outcome: Compact Growth, the RSES states that regeneration and development of brownfield and infill sites to achieve higher density populations needs to be a priority for Local Authority plans. Targeted initiatives and actions are sought.

The Issues Paper has identified that achieving compact growth in all settlements in Kerry is a key challenge to meet. The RSES similarly identifies that planning for Compact Growth is complex. The RSES states lower tiered plans may consider active land management initiatives. RPO 34 seeks initiatives that enable regeneration of brownfield lands over greenfield lands across all tiers of settlements. RPO 35 seeks the identification of priorities for rejuvenation and for Development Plans to set out a transitional minimum requirement of 30% growth of all new homes within the existing built up footprints of settlements aligned with an evidence based on availability and deliverability of lands.

The importance of regeneration within both Key Towns is specifically identified for Tralee and Killarney to help achieve compact growth and renewal on strategically located lands within the existing footprint of both settlements.

The Development Plan is supported in seeking action on these sites which should be good practice models of regeneration, brownfield redevelopment and achieving compact growth in the Region (examples such as the Island of Geese and Fels Point in Tralee and Sara Lee, Aras Phadraig and St Finians in Killarney).

### **4.0 Rural Areas**

The SRA welcome the identification of key challenges and opportunities for rural areas in Kerry, which align with challenges and policy responses in the RSES.

The Issues Paper has noted:

- Based on GeoDirectory registers between 2015 and 2020, 1,840 new addresses were added to its register. 59% of these additions have taken place outside of the County's urban areas including small towns and villages.
- Many Tier 2 towns and villages are experiencing population decline. For a small number, the population has increased marginally or at best, has remained static.
- A preference to live outside towns and villages and the growth in on-line retailing has resulted in population decline and a corresponding demise of the historic vibrancy and vitality of town and village centres.
- Census 2016 data shows that only 8% of Kerry's population is employed in the Agriculture, Forestry and Fishing sector. Given the relatively low agricultural employment figures, it is recognised that the promotion of farm diversification and new employment opportunities within the agriculture sector is necessary to sustain rural communities.

The RSES is committed to supporting all communities both urban and rural and recognises that rural towns and villages are the local economic drivers for their surrounding areas. Aligned with the Issues Paper, RSES Chapter 3 recognises the decline of population and services in many villages and rural areas as a problem of strategic national and regional importance and acknowledges the need for investment in towns and villages to reverse decline and attract population and enterprise growth.

An unsustainable pattern of dispersed urban generated housing growth in the countryside undermines the role of our towns and villages. Section 3.7 Rural Areas is an important support for the KCDP 2022-2028 to address the challenges posed in the Issues Paper.

The NPF and RSES makes a distinction between areas under urban influence i.e. those within the commuter catchment of cities and large towns and centres of employment, and rural areas outside these catchments where a more flexible approach to rural housing will apply.

The Core Strategies in County Development Plans should identify areas under strong urban influence in the hinterlands of settlements. They will set an appropriate rural housing policy response to avoid ribbon and over-spill development from urban areas, support revitalised towns and villages, achieve sustainable compact growth targets and protect the rural resource for rural communities.

RPO 27 Rural addresses the issue of urban-generated housing to restrict the development of rural housing based on clearly defined eligibility criteria. Through this RPO, Local Authorities shall include policies for the protection of the viability of smaller towns and rural settlements. Core Strategies shall identify areas under urban influence and set the appropriate sustainable rural housing policy response which facilitates the provision of single housing in the countryside based on criteria.

RPO 26 Towns and Villages is an important objective in support of the KCDP 2022-2028 to address challenges identified for rural areas and seeks to:

- Strengthen the viability of our towns and rural settlements including the protection of essential mixed-use rural services.
- Seek investment and initiatives that deliver smart technologies, revitalisation of mixed-use town and village centre streets, pilot initiatives for regional good practice in renewal and re-use of buildings.
- Seek investment and the sustainable delivery of holistic infrastructures in towns and villages to support the service role of settlements along the region's tourism corridors.

Other Initiatives supported by the RSES to assist renewal include:

- New Homes in Small Towns and Villages" initiatives and the delivery of actions by Local Authorities, Irish Water, communities and other stakeholders in the provision of services and serviced sites.
- Local authorities shall identify and prioritise a programme for the provision and implementation of serviced sites within towns and villages as an objective of Development Plans.
- Coordination between Local Authorities, Irish Water and other stakeholders to deliver investment in water and wastewater treatment services (including Green infrastructure solutions).

Further, the objectives of the RSES for the Region's urban and rural settlements serve as a support for stakeholders in applying for funding under schemes including the Urban Regeneration and Development Fund and the Rural Regional Regeneration and Development Fund.

The RSES alone however is not sufficient to address this issue. New national guidelines for rural housing and development plans are awaited and will have an important role for the KCDP 2022-2028 when published. The Council's own Housing Need Demand Assessment (HNDA) for the preparation of housing strategies will provide a robust evidence base to assist developing long term strategic views on housing needs across all tenures and typologies, including an evidence base for rural housing (NPF National Policy Objective 20).

Aligned with the Issues Paper, the importance of economic diversity and resilience in our rural areas is highlighted throughout the RSES.

RSES Section 4.5 for rural economic development states that sustainable rural communities are dependent on viable and vibrant towns and villages. In the absence of targeted planning strategy,

proactive infrastructure and support actions, this decline will continue. Rural areas need diversity and innovation to ensure economic resilience and job creation.

Good practice examples of rural innovation for the Region are cited in the RSES and include reference to Kerry's success under Enterprise Ireland's Regional Enterprise Development Funds, RDI Hub Killorglin and other centres such as the Skellig Centre for Research and Innovation and the Dingle Creativity and Innovation Hub. The KCDP 2022-2028 can look to the factors that contributed to the success of these examples and success of the County in winning competitive funding for enterprise and innovation.

RSES Section 4.7, building on the importance of towns and villages as drivers for rural economic growth, sets out objectives and principles on placemaking for enterprise development.

Refer to further sections below on RSES support for a strong and resilient economy through the KCDP 2022-2028.

## **5.0 Networks for Collaboration**

The RSES identifies the economic role played by smaller scaled settlements for their surrounding rural hinterlands and the opportunities for sharing assets and opportunities (see RPOs 28-30) between different settlements to drive rural economic growth.

The SRA welcome the references in the Issues Paper "Economic Development and Activity" to RSES support for the role of the Kerry Hub and Knowledge Triangle and the North Kerry/West Limerick/Shannon Estuary and Clare networks and the importance of these networks for the Region's and County's economic hierarchy.

The Kerry Hub is noted as established good practice in Section 4.4 Our Region's Economic Engines demonstrating how successful models for collaborative approaches between places, strategic assets and stakeholders (Local Authority, enterprise agencies, private enterprise, academia, communities) to drive economic growth for the locality, county and region.

The SRA strongly support the existing and further initiatives through the Development Plan to harness the potential of such networks.

## **6.0 Placemaking**

A strong emphasis is demonstrated in the Issues Paper on placemaking and sustainable places to live. This is strongly supported for the Development Plan and aligns with the Sustainable Place Framework of the RSES (RPO 31).

The growth of compact settlements must be in tandem with infrastructure and facilities that enhances the unique identity and quality of life offer of different places. The need for closer alignment between where people live and work needs to be strongly signalled in the KCDP 2022-2028.

Successful placemaking will require sustainable higher densities in our towns to increase activity, support local services and support sustainable mobility.

The RSES supports 10 Minute Towns as a concept whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services. Our urban communities will need sufficient densities to realise the potential of a 10-Minute Town and it's benefits for placemaking.

A strong emphasis on such initiatives in the Development Plan will be supported by RSES under:

- Section 3.9 Placemaking
- RPOs under Chapter 6 Connectivity
- Chapter 7 Quality of Life, RPO 176 "10-Minute City and Town Concepts".

The SRA are a partner region in the EU Interreg Europe MATCH-UP project which aims to achieve significant improvements of modal interchange to foster low-carbon urban mobility. An outcome from the project is to set a framework of good practice to implement 10 Minute Town concepts successfully across Key Towns and other settlements in the Region. Tralee is a case study town within this report and a series of recommendations are provided to enhance permeability in Tralee to be a successful 10-Minute Town. There are opportunities for Tralee and other settlements in County Kerry to be leaders of good practice in our Region for sustainable 10-Minute Town concepts. The important role of Local Transport Plans to help achieve this is noted below in comments for Transport and Mobility.

## **7.0 Strong and Resilient Economy**

The SRA welcome the emphasis in the Issues Paper on both the diversity of economic sectors and economic drivers for the County. The transition of the Tralee Institute of Technology (with Cork) to the Munster Technological University (MTU) will have substantial positive impact on the Region in terms of economic development and in developing a Learning Region. The emphasis of this achievement in the Issues Paper is welcomed and should be strongly supported through the KCDP 2022-2028 (RSES RPO 184 is a specific support for the role of the MTU in the Region).

The strength of indigenous industry and supporting growth in micro, small and medium enterprises is a focus area for the Issues Paper and is supported by the RSES (Chapter 4).

The importance of tourism in Kerry is significant, attracting 2.3 million overseas and domestic tourists annually. In 2019, Kerry had 18% of its work force employed in tourism and related sectors compared to 8% for the state. Due to the impacts of COVID-19, in numeric terms the loss in incomes to Kerry in 2020 in respect of tourism and related industries could be €400 million (approx. 70%).

Complimenting the Council's analysis of the economic impact of COVID 19, the three Regional Assemblies published the COVID 19 Regional Economic Analysis to inform policymakers at a local, regional and national level of the extent of economic exposure and resilience across Ireland. This is consistent with the key principal of building economic resilience as supported in the RSES (RPO 75 Anticipating Economic Structural Changes).

This report developed a COVID-19 Exposure Ratio which represents the total number of its commercial units that were operating in the sectors likely to be worst affected by the COVID-19 outbreak, as a proportion of its total commercial stock as of September 2019. The higher this ratio is for an area, the more likely this area is exposed to significant economic disruption.

The report highlights Kerry as the county with the highest "COVID-19 Exposure Ratio", with 53.8 per cent of its commercial units operating in the sectors likely to be worst affected. Dingle (62.6%), Kenmare (61.9%) and Killarney (57.8%) are amongst the most exposed towns in Ireland, with Killarney, in absolute terms, having the highest number of commercial units operating in the sectors likely to be worst affected (509 units).

RSES Section 4.6 and RPO 53 specifically supports the tourism sector and infrastructure to service it. In support of the KCDP 2022-2028 building greater economic resilience, the five principles that underline the RSES economic strategy (refer to Section 4.2 of the RSES) should be reflected in the economic policies of the Development Plan. These are:

- Smart Specialisation: Bringing together key stakeholders with real local knowledge in a geographic area to identify the competitive advantages and develop new economic opportunities.
- Clustering: Putting in place a favourable and connected regional business ecosystem in which new players can emerge and support new value chains and emerging new industries.

- Placemaking: A significant emphasis on making attractive places to live, learn and work to attract talent.
- Knowledge Diffusion: A Learning Region, developing skills, talent, research and development, education assets and access to life-long learning. Leveraging the asset of the MTU is a significant opportunity for Kerry to have a leading role in a Learning Region.
- Capacity Building: The capacity to bid for funding and to respond to emerging challenges to secure greater economic resilience is supported.

As the RSES marries spatial planning and economics, there is a strong emphasis on creating attractive places to attract skills and talent. RSES Section 4.4 Our Region's Economic Engines is a support for the KCDP 2022-2028 leveraging proximity to two metropolitan areas, having a strong role on the AEC, possessing two of the Region's Key Towns and established networks for collaboration.

The emphasis on placemaking in the Issues Paper is welcomed for enterprise growth in addition to living and should be further developed as a priority for economic growth (RPO 61 Health-Place Audit for Placemaking is a support).

To implement initiatives making the county an attractive place for enterprise, the bidding capacity to bid for and win competitive funds needs to be strong. Developing this capacity is essential in light of competitive funds available under Project Ireland 2040.

Supporting the delivery of actions under the SW Regional Enterprise Plan, SW Regional Skills Forum and Kerry Local Economic Community Plan are also important and should be supported through the KCDP 2022-2028.

Regarding the Marine Sector, the opportunities for the Southern Region under the National Marine Planning Framework (NMPF) are significant, with Kerry's coastal assets and strategic lands for marine related industry in the Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary playing a significant role. The important roles of the Tier 1 Ports of Cork and Shannon Foynes as a driver for national and regional economic growth, in addition to Kerry's coastal network of Ports of Regional Significance and National Fishing Harbour Centres (Tralee Fenit and Daingean Úi Chúis are specifically cited in Section 6.3.4.2) and the good practice example of the SIFP (Section 4.9 and RPO 79) are important supports for the KCDP 2022-2028.

Kerry's unique Gaeltacht assets are supported in the RSES for their unique economic and cultural character and in offering a competitive advantage for enterprise. Section 7.2.4 and RPO 196 is an important support for the role of the Gaeltacht service towns, economic loci, network of digital hubs, enterprise infrastructure and the need for social and economic infrastructure investment for Gaeltacht areas to fulfil their potential in the Region's economy.

## **8.0 A Connected and Smart County**

The strategy diagrams in the Issues Paper convey the important role of connectivity to unlock the full economic potential of assets in Kerry.

Strengthened connectivity across the region (digital and transportation, especially with a focus on the efficient movement of freight) will enable interaction between regional economic drivers. This includes collaboration across the cities and metropolitan areas, the Atlantic Economic Corridor, Key Towns and our network of towns and villages in addition to efficient freight movement between ports and airports (essential for an island open market economy).

RSES Chapter 4 A Strong Economy and Chapter 6 Connectivity both address the importance of digital and transport connectivity to underpin the Region's economic drivers. Kerry's port assets (as supported above) and regional airport assets (Kerry International Airport) are specifically cited in the RSES (Sections 6.3.4.2 and 6.3.4.3 respectively). The role of these assets as part of the collective

strength of the Region's port and airport assets will be developed further through a Regional Freight Strategy (RPO 141), Regional Port Strategy (RPO 145) and Airport Strategy (RPO 149) with the Local Authority as a key stakeholder. These initiatives, which will develop the future niche roles for Kerry's international connectivity infrastructure, should be supported through the KCDP 2022-2028.

Digital infrastructure and smart technologies are critical enablers for economic and social revitalisation. A Smart Region, embedding digital technology across many functions to improve our quality of life, is central to achieving the RSES vision. RSES specifically seeks Smart Cities to be the engines of our Smart Region, where good practices are implemented and extended across our cities, towns, villages and rural areas. Such initiatives will enhance our Region's competitiveness, attractiveness and economic resilience. Actions arising from Kerry County Council's Digital Strategy and future iterations should be strongly supported through Development Plan policy.

## **9.0 Transport and Mobility**

The Issues Paper addresses the role of transport to reduce Kerry's peripherality, strengthen the external linkages to the County across all modes and improve modal shift away from private car to active travel (walking and cycling) and public transport.

RPO 151 "Integration of Landuse and Transport" and RPO 152 "Local Planning Objectives" set out important principles to guide land use development in settlements across the Region to enable behavioural change and support active travel and viable public transport services with the right development in the right locations. Other objectives in Section 6.3.6 Transport Investment Priorities will support KCDP 2022-2028 policies for sustainable mobility.

The SRA support the role of Local Transport Plans (LTPs) to be prepared for Key Towns and other settlements (RPO 157) by Local Authorities based on Area Based Transport Assessment guidance from the NTA and TII.

LTPs will plan for the efficient and sustainable movement of people, goods and services within, to and from plan areas, targeting actions for different transport modes, inter-change between modes, modal shift to sustainable transport and targeting interventions. LTPs will play an important role in the Region's transport strategy, contributing to improved regional connectivity and sustainable mobility.

The RSES supports the sustainable development of greenway and blueway networks across our Region. Section 7.2.7 specifically cites support for the South Kerry and North Kerry Greenways and RPO 200 and 201 are a support for the KCDP 2022-2028 in the development of trails, walking and cycling routes in the County.

Of equal importance from a regional perspective, smaller, cost effective measures to enhance walking and cycling permeability within and between our settlements have RSES support. RPO 174 especially is a strong support for Local Authority policy and actions to improve walking and cycling facilities within and between settlements.

Of importance for the rail network connecting to Kerry (importantly servicing two Key Towns), Section 6.3.6.7 and RPO 170 is important for improved passenger and freight services for Kerry.

RSES support for intra-regional rural connectivity and improvements to transport networks along the region's national tourism corridors in Chapter 6 are important for Development Plan policy for strengthened rural connectivity. Road based transport is often the only viable mode for rural and peripheral locations. The strategic road improvement schemes identified under the National Development Plan to improve the external linkages from Kerry to Cork and Limerick for economic interactions, in addition to other important connections in the County (such as improved road connectivity to Fenit Port) are supported in the RSES (RPOs 167 and 168). The County Development Plan should ensure investment in road infrastructure is also framed in economic, social, environmental

and sustainable transport terms (the opportunity to strengthen rural public transport and bus networks).

### **10.0 Natural Resources and Green Infrastructure**

The SRA welcome the emphasis on the joined up thinking between Green and Blue Infrastructure (GBI), bio-diversity, protecting natural resources and spatial planning as demonstrated in the Issues Paper. Promoting a Green Agenda and Green Economy through the KCDP 2022-2028 is welcomed and supported.

In addition to GBI, the KCDP 2022-2028 could expand references to Nature-Based Solutions (NBS). GBI and NBS should be a key concept of a local authority's Development Plan, informing actions and strategy around economic development and placemaking.

Local authorities are encouraged to collaborate with appropriate stakeholders and infrastructure delivery agencies to seek opportunities to appropriately design, deliver and manage green and blue infrastructure. An example of innovatively using GBI is the consideration of Integrated Constructed Wetlands as alternatives to waste water network connections for settlements with service capacity issues.

The RSES also states that spatial planning can play a significant role in ensuring that the design of developments prevent and reduce diffuse pollution, including the use of Sustainable Drainage Systems (SuDS). Urban Blue Corridors can provide many benefits including: more effective management of urban flood risk; improved access, additional and more useable public open space, and improved biodiversity. The RSES promotes the guidance document, *Planning for Watercourses in the Urban Environment* published by Inland Fisheries Ireland which provides an integrated watercourse protection strategy. Development Plan policies that support these good practices are strongly encouraged.

The SRA will welcome continued engagement with the Local Authority throughout the pre-draft stage to support these concepts through RSES implementation and learnings from the EU Interreg Europe Blue Green City project. The SRA are a partner region on this project and through it, the SRA will seek to disseminate good practices and knowledge to improve GBI policy and improve the integration of GBI infrastructure in projects throughout the Region.

Other important supports for the KCDP 2022-2028 that align with themes raised in the Issues Paper include protection of our National Parks (Section 7.3.2), Kerry's Dark Sky Reserve (RPO 132) and protection of peatlands (RPO 104).

### **11.0 Climate Action**

The Issues Paper demonstrates that climate actions are central to policy proposals for people and places, economy and employment, transport and mobility, land use, energy inter alia. This is welcomed and implementation of Kerry County Council's Climate Change Adaptation Strategy should be reinforced in the KCDP 2022-2028. RSES which places a priority on climate change at the outset of the context and vision for the RSES strategy.

The existing contribution made by Kerry to renewable energy production (especially wind energy) for the Region is stated in the Issues Paper and demonstrate delivery under RSES objectives for resource efficiency and renewable energy under Chapter 5 (refer to Appendix 1).

The SRA strongly recommend support for the initiatives of the Climate Action Regional Offices (CAROs). This will align with RSES support to the role of CAROs under RSES Chapter 5 RPO 88 which states it is an objective to ensure effective co-ordination of climate action with the Climate Action Regional Offices and local authorities to implement the Climate Action Plan, National Mitigation Plan and the National Adaptation Framework in the development and implementation of long-term solutions and extensive adaptation measures.

## **12.0 Community**

The SRA welcome the commitment to delivering social infrastructure and high- quality services for our existing and changing population profiles. Collaboration with the Local Community Development Committee, Kerry Public Participation Network and implementation of actions through the County’s Local Economic and Community Plan (LECP) are welcomed and supported under the RSES. A strong role for volunteering and active citizenship (RSES Section 7.1.3) should also be supported through Development Plan policy.

RSES supports the key social and community themes raised for healthcare and support for an aging demographic, smart aging initiatives, access for all and childcare, education, training and skills development.

Retrofitting high quality infrastructure and services to communities who experienced past high rates of growth, but without corresponding physical and social infrastructure to a high standard, is a priority, Chapter 7 RPO 175 “Improving Regional Quality of Life Through Infrastructure Led Planning” seeks to tackle such legacies.

The RSES places a strong emphasis on education, skills development and life-long learning, with recognition of a Learning Region status. This designation builds on the success of Cork and Limerick (expanding to Waterford) as UNESCO Learning Cities and the potential to expand such initiatives to urban and rural centres across our region. Through access to learning for all, enterprise growth, social inclusion and job opportunities for all and quality of life is enhanced. Development Plan policies in support of a Learning Region are encouraged.

## **13.0 Environmental Assessments**

The RSES is informed by extensive environmental assessments, contained in the SEA, SEA Statement, AA Determination, Natura Impact Report and Regional Flood Risk Assessment, which are available on the SRA Website. These assessments looked at environmental sensitivities for all parts of the Region and we would recommend that Kerry County Council review these documents to inform the Council’s own environmental assessments, including mitigation measures identified to address environmental sensitivities and constraints.

## **14.0 Other Comments**

Appendix 1 further aligns the main themes presented by the Issues Paper with specific RSES RPOs to support the preparation of the KCDP 2022-2028.

## **Conclusion**

The SRA welcomes the pre-draft public consultation and commend the Planning Policy Unit in Kerry County Council for the robust approach to analysis, evidence base building, key issues and questions posed in the Issues Paper. The Development Plan comes at a critical stage in the development of Kerry and it needs to provide a robust pathway to achieve the transformative change identified in the NPF and RSES.

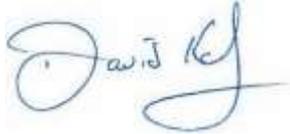
The SRA supports the direction of change signaled across the main themes of the Issues Paper, which will meet the objectives of the RSES. Recommendations are provided to assist and strengthen the approach under themes raised and to strengthen alignment between the regional and local tier in the draft plan.

In providing our observations, the SRA have had due regard to Section 27A of the Planning and Development Act 2000 (as amended).

As the pre-draft process advances and details emerge for the Core Strategy and the distribution of growth targets within this development plan cycle of 2022-2028, especially through Housing Need Demand Assessment, the SRA will have further recommendations at the appropriate stages.

Further engagement with the SRA as a key stakeholder and Kerry County Council in the development of the Draft Development Plan is encouraged. The RSES team are available for future consultation and clarities required regarding this submission and during the pre-draft preparation stages.

**Mise le meas**

A handwritten signature in blue ink that reads "David Kelly". The signature is written in a cursive style with a large, stylized 'D' and 'K'.

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David Kelly  
Director Southern Regional Assembly

## Appendix 1

### Alignment of Key Themes in the Issues Paper with RSES Regional Policy Objectives (RPOs)

#### People and Places

- 1) In planning for infrastructure led growth, note the role of Key Towns (Tralee and Killarney) under RPO 11, RPO 15 and RPO 18).
- 2) The sustainable concept of 10-Minute Towns is positive for placemaking and is supported in RSES Section 3.9 Placemaking and specifically in Chapter 7, RPO 176 “10-minute City and Town Concepts”.
- 3) Infrastructure investment across the different tiers of settlements are addressed under:
  - RPOs 4 “Infrastructure Investment”;
  - RPO 7 “Delivery and Funding”;
  - RPO 8 “Investment to Deliver on the Vision for Metropolitan Areas”;
  - RPO 9 “Holistic Approach to Delivering Infrastructure”;
  - RPO 11 “Key Towns”; and
  - RPO 26 “Towns and Villages”.
- 4) See also Chapter 8 RPOs:
  - RPO 208 “Irish Water and Water Supply”;
  - RPO 209 “Strategic Water Supply Projects”;
  - RPO 211 “Irish Water and Waste Water”;
  - RPO 212 “Strategic Wastewater Treatment Facilities”; and
  - RPO 213 “Rural Wastewater Treatment Programmes”.
- 5) Support for a sustainable place framework for towns and villages, including New Homes in Small Towns and Villages and co-ordination with Irish Water and other stakeholders to deliver investment in water and wastewater treatment is supported under RSES Chapter 3, Section 3.6 Towns and Villages and RPO 26.

#### Settlements and Placemaking

- 1) A key message of the RSES under RPO 2 “Planning for Diverse Areas” is that the overall strategy builds on cities and their associated metropolitan areas as engines of growth and seeks, in parallel, to re-position the Region’s strong network of towns, villages and diverse rural areas in an economically resilient, imaginative and smart way.
- 2) Opportunity for the Development Plan to support project partnerships and collaborations across settlements under Section 3.8 (RPO 28 “Collaboration/Partnership”, RPO 29 “Rural Settlement Networks” and RPO 30 “Inter-Urban Networks as Regional Drivers of Collaboration and Growth”).
- 3) Cork MASP Policy Objective 4 “Cork Metropolitan Area Regional Interactions” also supports the role for networks in Kerry.
- 4) Tailored approaches to high density are supported under RSES Chapter 3 Section 3.9 Placemaking , which seeks higher densities taking account of the need for variability and flexibility of local circumstances and an evidence-based approach.
- 5) The importance of higher density land use and transport planning integration is a key theme in RSES Chapter 6 which should be reflected in the settlement and placemaking strategy. In particular, the following RPOs address the themes and direction of change needed:
  - RPO 151 Integration of Land Use and Transport;
  - RPO 152 Local Planning Objectives;
  - RPO 157 Local Transport Plans; and
  - RPO 165 Higher Densities.
- 6) Quality placemaking is at the core of RSES. Chapter 3 and Chapter 4 places a strong emphasis on quality placemaking principles to attract growth and regeneration of urban centres and enterprise growth (as identified it a key policy area also for the IDA to attract investment). Refer to RPO 31 Sustainable Place Framework and RSES Chapter 4, Section 4.7 Placemaking for Enterprise Development for guiding principles to assist initiatives.

## Transport and Connectivity

- 1) References to strategic connectivity between metropolitan areas, economic corridors, Key Towns, networks, ports and airports are supported by RSES , especially:
  - RPO 15 Tralee part (b) which supports strengthened connectivity and interaction between Tralee Key Town, Cork and Limerick-Shannon Metropolitan Areas and the Atlantic Economic Corridor (AEC).
  - RPO 18 Killarney part (b) which similarly supports strengthened connectivity and interaction between Killarney Tralee Key Town, Cork and Limerick-Shannon Metropolitan Areas and the Atlantic Economic Corridor.
  - Cork MASP Objective 4 Cork Metropolitan Area Regional Interactions which recognises under part (a) the importance of strengthened connections between the Cork MASP, Limerick-Shannon MASP, AEC and Kerry Hub Knowledge Triangle and under part (b) between the Cork MASP and Key Towns (Tralee and Killarney).
  - Limerick Shannon MASP Policy Objective 9 Potential Collaboration Networks part (c) which recognises strengthened connectivity between Galway, Ennis, Shannon and Limerick with North Kerry Shannon Estuary Network, the Kerry Hub and Knowledge Triangle and AEC.
  - RPO 166 “Investment in Strategic Inter Regional Multi-Modal Connectivity to Metropolitan Areas and Economic Corridors”
- 2) Strengthened emphasis on the importance of the efficient movement of freight, maintaining and strengthening the TEN-T Network through the County and maintaining and strengthening the strategic rail network is recommended. Important references include:
  - RPO 140 “International Connectivity”;
  - RPO 141 “Regional Freight Strategy”;
  - RPO 146 “High Quality International Connectivity-Ports”;
  - RPO 170 Rail
- 3) In addition to Ports referenced above, support for the role of regional airports for our strengthened international connectivity are provided through RPOs 148-150. These are an important support for the role of Kerry International Airport.
- 4) Strengthened emphasis on metropolitan, cross county and inter county greenway connections are encouraged and supported by :
  - RPO 174 “Walking and Cycling”;
  - RPO 200 “Green Infrastructure and Recreation”;
  - RPO 201 “National Trails, Walking Routes, Greenways and Blueway Corridors”;
- 5) Support for effective land use and transport planning integration and shift to sustainable modes is provided under RSES Section 6.3.6 Transport Investment Priorities. RPOs in support of the themes raised include:
  - RPO 151 “Integration of Land Use and Transport”;
  - RPO 152 “Local Planning Objectives”;
  - RPO 157 “Local Transport Plans”;
  - RPO 160 “Smart and Sustainable Mobility”;
  - RPO 161 “Smart Mobility”;
  - RPO 162 “Multi-Modal Travel Integration”;
  - RPO 163 “Sustainable Mobility Targets”.
- 6) Road based transport is often the only viable and sustainable mode for rural and peripheral locations. It is essential for “life lines” whereby smaller urban settlements and rural areas can access essential services, including health, education, retail, employment etc. and interchange with other public transport modes in key settlements through a safe and well-maintained road network. A high-quality road network is needed for successful rural public transport services, the movement of freight and emergency services. In larger urban areas, strategic road investment for orbital routes can facilitate a more efficient separation of economic and HGV movements, reduce congestion in the urban cores to improve the public realm, interchange

facilities and active travel and allow new bus corridors to be established. Greater use of our road network for public transport, inter-regional bus services and local bus services, is an opportunity to encourage greater modal change. The County Development Plan should ensure investment in road infrastructure is also framed in economic, social, environmental and sustainable transport terms (bus networks). References in support of the strategic road network include:

- RPOs 167 “National Road Projects”;
  - RPO 168 “Investment in Regional and Local Roads”;
  - RPO 171 “Bus”;
- 7) Recommended references for the Development Plan also include RSES Chapter 6 RPOs 158 Intra-Regional Rural Connectivity, RPO 159 Role of Transport in Access for All, RPO 172 Rural Transport and RPO 173 Tourism Corridors (services along the key national tourism corridors).

### **Economic Development**

- 1) Welcome the comprehensive cross references to the RSES.
- 2) Welcome the recommendation to align drivers for economic growth with principles of the RSES settlement strategy. For example,
  - Metropolitan Cork and Limerick Shannon.
  - The AEC
  - Tralee and Killarney Key Towns
  - Networks such as
    - Kerry Hub and Knowledge Triangle
    - North Kerry/Shannon Estuary
- 3) Reflect interaction between the County’s economic drivers with wider regional economic drivers, enabled through enhanced regional connectivity. These include collaboration across the Region’s three metropolitan areas of Cork, Limerick-Shannon and Waterford and the Atlantic Economic Corridor which complement the economic roles of the County’s Key Towns and Networks. Refer to RSES Chapter 3, RPO 6 “Collaboration Between Metropolitan Areas”, Chapter 4 Section 4.4 “Our Region’s Economic Engines” and RPO 41 AEC.
- 4) Reflect the strategic theme of enhanced connectivity to enable economic spread between regional engines, support for which is specifically addresses under RSES Chapter 6 RPO 166 “Investment in Strategic Inter Regional Multi-Modal Connectivity to Metropolitan Areas and Economic Corridors”.
  - It is important the County’s economy policies also integrate the following principles as detailed in RSES Chapter 4, Section 4.2 Economic Strategy which are Smart Specialisation, Clustering, Placemaking for Enterprise Development, Knowledge Diffusion and Capacity Building.
- 5) The theme of rural innovation is strongly supported in the RSES. The RSES supports diversity, innovation and a network of viable rural towns and villages to ensure economic resilience and job creation. The Development Plan should reflect RSES Chapter 4 Section 4.5 Rural Development and RPOs 43-50 (addressing themes of the Common Agriculture Policy, Action Plan for Rural Development, digital infrastructure, rural partnership models, innovation hubs and diversification).
- 6) The theme of digital infrastructure, Smart Cities and a Smart Region are also strongly supported in Chapter 6 as follows:
  - RPO 134 “Smart Cities and Smart Region”;
  - RPO 135 “High Quality High Capacity International Digital Transmission”;
  - RPO 136 “National Broadband Plan”;
  - RPO 137 “Mobile Infrastructure”;
  - RPO 138 “Digital Strategies”.

- 7) Tourism is addressed as a key sector and is supported under RSES Chapter 4, Section 4.6 Sector Development Opportunities and RPO 53 Tourism.
- 8) The Marine Economy and opportunities for the Region under the National Marine Planning Framework is also a key sector in RSES Chapter 4 with significant RPO support. In Section 4.9 Support to marine sectors will be addressed under this separate heading, as per the Issues Paper. Specifically for Kerry, RPO 79 Shannon Estuary and Other Harbour Plans, RPOs 142-147 Ports and RPO 225 (reference to Tarbert/Ballylongford) are supports.

### **Water and Wastewater Infrastructure**

- 1) RSES Chapter 3, Section 3.6 Towns and Villages contains several regional policy positions for infrastructure led growth of smaller settlements and seeks co-ordination between local authorities and Irish Water and other stakeholders to deliver investment in the sustainable development of water and waste water treatment services for rural towns and villages.
- 2) RPO 26 “Towns and Villages” specifically seeks under part (f) co-ordination between Irish Water and other stakeholders to deliver water and waste water infrastructure. Part (g) of the objective supports New Homes in Small Towns and Villages initiatives and seeks collaboration with Irish Water and stakeholders for serviced sites initiatives.
- 3) Chapter 9 Implementation and RPO 227 “Investment and Funding” supports Local Authorities and communities in achieving the drawdown of investment funds. The potential for funding streams to address services infrastructure that are part of, and add additionality to, an overall regeneration strategy for smaller settlements. Types of activities supported under the NPF Rural Regeneration Development Fund include *“Measures to address infrastructural deficiencies in relation to services, access, or other infrastructure that may be needed to support town or village regeneration”*.
- 4) Infrastructure investment across the different tiers of settlements are addressed under:
  - RPOs 4 “Infrastructure Investment”;
  - RPO 7 “Delivery and Funding”;
  - RPO 8 “Investment to Deliver on the Vision for Metropolitan Areas”;
  - RPO 9 “Holistic Approach to Delivering Infrastructure”;
  - RPO 11 “Key Towns”; and
  - RPO 26 “Towns and Villages”.
- 5) See also in Chapter 8:
  - RPOs 208 “Irish Water and Water Supply”;
  - RPO 209 “Strategic Water Supply Projects”;
  - RPO 211 “Irish Water and Waste Water”;
  - RPO 212 “Strategic Wastewater Treatment Facilities”; and
  - RPO 213 “Rural Wastewater Treatment Programmes”.

### **Climate Change**

- 1) The RSES is committed to implement regional policy consistent with the Climate Action Plan 2019. Important RPO’s in support of climate action and transition to a low carbon society and economy to reference include:
  - RPO 87 Low Carbon Energy Future;
  - RPO 88 National Mitigation Plan and National Adaptation Framework;
  - RPO 89 Building Resilience to Climate Change;
  - RPO 90 Regional Decarbonisation;
  - RPO 91 Decarbonisation in the Transport Sector;
  - RPO 94 Decarbonisation in the Agriculture Sector; and
  - RPOs 95-104 on Renewable Energy.
- 2) Supporting the initiatives of the Climate Action Regional Offices (CAROs) is strongly recommended. This will align with RSES support to the role of CAROs under RSES Chapter 5 RPO 88 which states it is an objective to ensure effective co-ordination of climate action with the Climate Action Regional Offices and local authorities to implement the Climate Action

Plan, National Mitigation Plan and the National Adaptation Framework in the development and implementation of long-term solutions and extensive adaptation measures. This is a particular strength for Cork as the lead local authority on the Atlantic Seaboard South CARO.

- 3) The SRA recommend an emphasis on proposals for smart and innovative approaches to waste management and promotion of the Circular Economy (RPOs 107-108) and opportunities in Biomass (RPO 109).
- 4) On flooding, the following RPOs are an important support:
  - Chapter 5 RPOs 113-119
  - RPO 120 Flooding and Coastal Erosion.

### **Green Infrastructure**

- 1) Strongly welcome and support the themes and direction of change signaled in the issues paper and in particular, welcome the reference to objectives of the RSES seeking greater integration of green infrastructure.
- 2) Recommend expanding the reference to Green and Blue Infrastructure (GBI) and also Nature-Based Solutions (NBS).
- 3) The GBI theme aligns with Local Authority commitments to Climate Action and will feature in mitigation, resilience and adaptation strategies. GBI and water conservation hits on both mitigation and adaptation.
- 4) References supporting the theme to note include:
  - RPO 110 "Ecosystems Services"
  - RPO 117 "Flood Risk Management and Biodiversity"
  - RPO 122 " Sustainable Drainage Systems (SuDS)"
  - RPO 124 "Green Infrastructure"
  - RPO 125 "Green Infrastructure Corridors"
  - RPO 126 "Biodiversity"

### **Biodiversity**

- 1) The SRA welcome and support the emphasis on biodiversity, which is given prominence as a standalone theme, complementary to Green Infrastructure, Climate Action, Heritage and the Environment. This is a positive signal on the direction of change needed for a greater appreciation on the role of bio-diversity for our environment, society and economy.
- 2) Reference RSES Chapter 5 Section 2.0 Protecting, Conserving and Enhancing Our Natural Capital, which supports ecosystems services which focuses on the way that the natural environment works as a system and the valuation of the natural environment to determine policy interventions to deliver net benefits to society. Payment for Ecosystems Services (PES) approaches are supported which brings economic thinking and a market mechanism into the provision of natural resources.
- 3) Reference RSES Chapter 5 good practices and RPOs in support of the River Basin Management Plans, Flood Risk Management and Biodiversity and support for initiatives by the Local Authority Waters Programme.
- 4) Reference the following specific RPOs which are supportive of Local Authority actions in implementing measures to identify, conserve and enhance the biodiversity of our Region:
  - RPO 126 Biodiversity
  - RPO 127 Invasive Species
  - RPO 128 All-Ireland Pollinator Plan
  - RPO 129 Landscape

### **Energy**

- 1) The RSES supports the Southern Region as a Carbon Neutral Energy Region.
- 2) Objectives in RSES Chapter 3 support smart technologies for energy efficiency in retrofitting initiatives (RPO 38 Retrofitting Initiative Priorities).

- 3) Objectives in RSES Chapter 4 support the low carbon economy and bio-economy and include RPO 57 “National Policy Statement on the Bio-Economy”, RPO 58 “Bio-Economy and Rural Areas” and RPO 56 “Low Carbon Economy”.
- 4) RSES Chapter 4, Section 4.9.2 “Growing the Blue Economy” includes support for off shore energy resources and RPO 85 “Renewable Offshore Energy”.
- 5) Objectives in RSES Chapter 8 support new energy infrastructure, delivery of networks, transition to new renewable energy technologies, the Integrated Single Electricity Market, renewable energy sources for data centres, indigenous renewable gas production, micro renewable generation local/community energy projects. Such objectives connect with climate action, regional decarbonisation and renewable energy objectives under Chapter 5 Environment. RPO 225 in particular includes reference to extending the gas network from Listowel into the Kerry Hub and Knowledge Triangle settlements of Tralee, Killarney and Killorglin.
- 6) References included in Chapter 5 Renewable Energy include:
  - RPO 95 “Sustainable Renewable Energy Generation”
  - RPO 96 “Integration of Renewable Energy Sources”
  - RPO 97 “Power Stations and Renewable Energy”
  - RPO 98 “Regional Renewable Energy Strategy”
  - RPO 99 “Renewable Wind Energy”
  - RPO 100 “Indigenous Renewable Energy Production and Grid Injection”
  - RPO 101 “International Hub for Energy Innovation”
  - RPO 102 “Energy Research Funding”
  - RPO 103 “Interconnection Infrastructure”
  - RPO 104 “Energy Storage and Carbon Capture”
  - RPO 105 “Clean Electric Heat Technologies & District Heating”
  - RPO 106 “Future Proofing and Retrofitting”

## **Community**

- 1) Welcome the themes addressed and commitment to delivering social infrastructure and high-quality services for our existing and changing population profiles.
- 2) Retrofitting high quality infrastructure and services to communities who experienced past high rates of growth, but without corresponding physical and social infrastructure to a high standard, is a priority. Chapter 7 RPO 175 “Improving Regional Quality of Life Through Infrastructure Led Planning” seeks to tackle such legacies.
- 3) Refer to RSES Chapter 7 Quality of Life which addresses many issues raised for supporting our communities and for reference:
  - RPO 176 “10-Minute City and Town Concepts”;
  - RPO 177 “Childcare, Education and Health Services”;
  - RPO 178 “Universal Health Services”;
  - RPO 179 “Diverse and Socially Inclusive Society”;
  - RPO 180 “Volunteering and Active Citizenship”;
  - RPI 181 “Equal Access”;
  - RPO 182 “Ageing Population”; and
  - RPO 183 Digital Strategies.
- 4) The RSES places a strong emphasis on education, skills development and life-long learning, with recognition of a Learning Region status. RPOs for reference include:
  - RPO 184 (support for higher education institutes and the new Munster Technological University);
  - RPO 185 “New School Facilities”;
  - RPO 186 “Life Long Learning”
  - RPO 187 “Education and Training”
  - RPO 188 “Regional Skills Forum”
  - RPO 189 Further Education and Training
  - RPO 190 Lifelong Learning and Healthy City Initiatives

- 5) Support for culture and arts in our communities is central to our quality of life. The development plan should integrate strong support to the culture and creative sectors (RSES Chapter 7 Section 7.2.2 and RPOs 191-194).
- 6) Support for our Gaeltacht communities, both for their culture, service towns, linguistic heritage and economic vitality, should have strong policy support (RSES Chapter 7 Section 7.2.4 and RPOs 195-197).
- 7) Support for parks, sports and recreation are essential for quality place making and our well-being and need strong policy support (RSES Chapter 7 Section 7.2.6 and RPOs 198-201).
- 8) Reference RSES Section 7.1.1 Inclusive Communities and Places for further support on building resilient , sustainable communities and initiatives including implementation of LECP actions.

### **Heritage**

- 1) The SRA welcome the theme and support the direction signaled where protection and enhancement of our built and natural heritage is important for our place making qualities and quality of life, essential to retain and attract population, enterprise investment and tourist visitors.
- 2) The SRA support initiatives by the Heritage Council including Collaborative Town Centre Health Checks which have a positive role in assisting town and village renewal initiatives.
- 3) Refer to RSES Chapter 3 Section 3.9 Placemaking, Section 3.11 Regeneration and RPO 34 “Regeneration , Brownfield and Infill Development” which includes support for regenerating and repurposing existing building stock in both urban and rural settings. RPO 26 “Towns and Villages” and RPO 38 “Retrofitting Initiative Priorities” also supports retrofitting infrastructure for energy conservation and re-use of our built assets to help achieve compact growth. Such initiatives should be balanced with heritage protection.
- 4) Refer to RSES Chapter 7 and the following RPOs to protect and maintain our environmental and built heritage:
  - RPO 202 “Natural Heritage, Bio-Diversity and Built Heritage Assets”
  - RPO 203 “Revitalisation of Historic Cores”
  - RPO 204 “Better Public Access”
  - RPO 205 “Built Heritage”
  - RPO 206 “Architectural Heritage”
  - RPO 207 “Archaeological Investigation”.