

Uimhir Thagarta Uathúil: KK-C162-341

Stádas: Submitted

Submission: Climate, Community, Innovation and Ambition

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Comhairliúchán:

Kilkenny City and County Draft Development Plan 2021-2027

Observations:

Nature recovery

Caibidil:

Volume One County » 9. Heritage and Culture » 9.2 Natural Heritage and Biodiversity » 9.2.2 Biodiversity Outside of Habitats Designated...

I welcome the opportunity to feedback on Kilkenny's new Draft County Development Plan (2021-2027). It is encouraging to see the many positive policies and objectives in the plan and its focus on climate adaptation and mitigation. My comments in this submission acknowledges the contribution and views of others and aims to highlight some additional points.

Biodiversity

With regard to the current biodiversity crisis, the new Plan should also set an objective to contribute, to the maximum extent possible, our share of the national commitment to protect 30% of the Earth's lands and seas by the end of the decade. This is a **commitment** Ireland made in January 2021 to under the 'High Ambition Coalition for Nature and People.' It is important that this national target is reflected in development plans. Such an objective will set a strong ambition for prioritising nature recovery and the promotion of biodiversity through all areas of LA functions.

In addition, the Draft Plan should aim to align with the expected level of ambition in the new **National Biodiversity Action Plan**. Clear objectives should be set out pursuing in clear and definitive language our obligations and commitments to new targets for recovering our county's natural environment, wildlife and biodiversity.

Comments on strategic objectives

Caibidil: Volume One County » 2. Climate Change » 2.5 Strategic Objectives

Carbon emission reduction targets

Objective 2H states that the Plan aims to '*achieve the commitment under the European Climate Alliance to the reduction of greenhouse gas emissions by 10 percent every 5 years*'. This objective should aim to align with the national target of 7% reduction per annum. It also does not state across what areas this objective will be measured. The objective should be updated to be clearer in this regard.

Objective 2G states that it is the aim of the Council to '*reduce energy related CO2 emissions of Kilkenny County Council*' but it does not state by how much or by when. The objective should be updated to be more specific in these terms.

Buildings

Some industries are particularly intense carbon emitters. These include the building and cement industries. The Draft Plan is an opportunity to include a policy on pursuing low carbon and sustainable materials for development achieving policy coherence across all aspects of Local Government activities and investments. There are examples and a large body of work on opportunities in developing with low carbon cement, built in rainwater harvesters, wooden frames and other sustainable materials.

Decarbonisation zones

The Draft Plan should include an objective to build on the outcomes and learnings from the new decarbonisation zones pilots.

New methodologies

New methodologies are being developed and the Plan should spotlight the need to incorporate new learnings and methodologies for continuous improvement and achievement of targets. The Plan should set a specific objective to incorporate new methodologies, data and insights as they become available and to use this to actively adapt actions to achieving our climate, biodiversity recovery and land protection targets.

Public engagement

Caibidil: Volume One County » 6. Housing and Community » 6.15 Social Inclusion

The new Plan is an opportunity to shift towards a more transformational view of planning, where communities are empowered through the planning process. Local Authorities have a powerful role in acting as catalysts for community empowerment and capacity development.

Inclusive communities

There is an opportunity to explore ways to make communities more inclusive. A Town-Centre first policy is a positive framework for ensuring that all communities feel welcome and can equally access services and facilities. The new plan should include reference to a heritage-led approach to town centre development as well as the Town-Centre first approach.

With regard to the minority communities, the Plan should have stronger objectives to ensure that all policies and plans proposed by the Council do not negatively impact on minority and minority ethnic communities. In the UK all new policies and plans must be accompanied by an equality impact assessment. The policy development process also engages specifically with stakeholders that are likely to be most affected by the proposed change. It would be a transformative step for the Draft Plan to include an objective on equality proofing the Draft Plan and all planning related proposals or policies.

Public consultation & engagement

With regard to the importance of community development and social inclusion, the Draft Plan is an opportunity to include specific objectives around public engagement in this section dealing with communities and social inclusion. The plan should incorporate an objective in this section to adopt the Gunning Principles in all engagements. While these principles may be followed in practice the Draft is an ideal opportunity to codify them to highlight the principles communities should expect when engaging on in planning and policies.

Gunning 1 – Consultation must be at a time when proposals are still at a formative stage

Gunning 2 – Sufficient reasons must be put forward for any proposal to permit “intelligent consideration” and response

Gunning 3 – Adequate time is given for consideration and response

Gunning 4 – The product of consultation is conscientiously taken into account

Stronger protection of habitats and trees

Caibidil: Volume One County » 9. Heritage and Culture » 9.2 Natural Heritage and Biodiversity » 9.2.5 Woodland, Trees and Hedgerows

- In addition to those objectives outlined, the new plan should have strong objectives prohibiting the felling of mature trees and hedgerows. The plan should also request Tree Management Plans to ensure that trees are strongly protected during development according to BS standards, and ensure trees are incorporated into the design of new developments.
- The new Draft Plan should also mandate the protection and preservation of existing hedgerows in new developments. In the exceptional case where their removal is necessary during the course of road works or other works, the Plan should ensure the highest-standard methodology is used for their assessment, removal and protection of the hedgerow network, and seek their replacement with new hedgerows of native species indigenous to the area.
- The Draft should require that in the exceptional circumstances where trees are removed these must be replaced in suitable locations at a ratio of 4:1.
- The new plan should include an objective for the development of a tree planting policy for the County.

Also

- Where a proposed development may have a significant impact on rare and threatened species that an Ecological Impact Assessment is prepared by a suitably qualified and indemnified person for a proposed development.
- The new Draft is also an opportunity to explore an ecosystems services scoring approach to inform planning decisions.
- The assessment of planning applications for the impact on natural heritage and wildlife and protected species must be significantly strengthened as a core objective in the new Draft.
- The Draft Plan should include clear objectives around connecting parks and open spaces via green corridors
- The Draft should include objectives around promoting community supported agriculture (CSA), allotments and community gardens.

- The Draft should include a clear objective to promote the transition to pollinator friendly green spaces in all open space public lands managed by the Council in pursuit of the protection of pollinators and nature recovery.
- New developments should be required to ensure all open spaces include landscaping with native trees and plants, the integration and enhancement of natural amenities and natural playgrounds for children.
- Include urban forests and urban greening as a key objective and provide support to communities who wish to advance such greening projects.
- In the context of Article 10 of the Habitats Directive (92/43/EEC), the Plan should also articulate clearly a goal to effectively manage features such as field boundaries that are essential for the protection and restoration of wild species numbers and diversity.
- The Draft Plan should acknowledge and raise awareness of the negative impacts of artificial lighting on wildlife. An objective should be included that requires lighting fixtures to provide only the amount of light necessary for personal safety. Lighting should have minimum environmental impact and in particular aim to protect species such as bats that are sensitive to light.

Landscape convention

Caibidil: Volume One County » 9. Heritage and Culture » 9.2 Natural Heritage and Biodiversity » 9.2.12 Landscape

The Draft should have a clear policy highlighting the importance of the European Landscape Convention and objectives to implement the objectives and actions of the National Landscape Strategy 2015-2025.

The Draft should have a clear objective against development that would adversely affect the character, principal components of, or the setting of historic parks, gardens and demesnes of heritage significance, their views and vistas.

Planning for Watercourses in the Urban Environment

Caibidil:
Volume One County » 9. Heritage and Culture » 9.2 Natural Heritage and Biodiversity » 9.2.6 Inland Waters - Rivers, Streams and Groundw...

The guidelines of the **Inland Fisheries 'Planning for Watercourses in the Urban Environment'** should be implemented as policy in the development plan. This will strengthen the protection of our watercourses and their associated riparian zones in urban areas.

Rural towns, fair and empowering development

Caibidil: Volume One County » 6. Housing and Community » 6.2 The Making of Place

This Plan is an opportunity to significantly improve rural towns. Dereliction should be tackled as a priority in particular in those towns that have a high level of derelict sites and a strong need for town-health checks and place-making interventions. These should be done in an empowering way with communities, building capacity through improvement processes that will be delivered with the new Plan.

Our analysis for our development plan in terms of place-making includes demographics but not talk about inequalities, or socio-spatial disadvantages. Yet this is a key factor in ensuring just and inclusive spaces that achieves the goals of fair and sustainable planning. Spatial justice involves “the fair and equitable distribution in space of socially valued resources and opportunities to use them” (Soja, 2009). In developing the new Plan, a lens of socio-spatial advantage/disadvantage is critical to achieving fairness. It would be good to see this articulated in the adopted plan.

Permeability objectives & safe travel to school

Caibidil: Volume One County » 12. Movement and Mobility » 12.5 Cycling and Walking » 12.5.1 Cycling Objectives

The Draft Plan should ensure that **all new proposals for development should be fully permeable for walking and cycling**. For existing neighbourhoods, the plan should set objectives for the retrospective implementation of walking and cycling facilities, in consultation with stakeholders. This will significantly add to the attractiveness of walking and cycling as trips can be shorter as well as safer for children and young people.

All new residential developments should in addition ensure filtered permeability, that is – they provide for walking, cycling, public transport and private vehicle access only. Private car through trips must be discouraged in designs.

In addition, the Draft should include a clear objective and target for providing the infrastructure for safe travel to school. An objective should also be included for incentivising and enabling new measures to support active travel to school.

Building a green economy

Caibidil: Volume One County » 5 Economic Development » 5.2 Economic Strategy for City & County

The European Green Deal should be referenced in the Draft Plan as the roadmap for achieving a sustainable economy for the EU and as our framework for promoting economic transition and development. The aim is to turn climate and environmental challenges into opportunities across all policy areas while ensuring a just and inclusive transition for all. In this regard the Plan should pursue economic development in a way that promotes not only innovation but also incentives transition from old practices of consumption, production and product lifecycles.

The Waste Action Plan for a Circular Economy should also be referenced and objectives included for ambitious achievement of the goals of the WAPCE. It has particular relevance for local businesses. Policies put in place to support the national objectives laid out in the plan and incentives for Kilkenny's businesses to take the lead on transitioning towards developing and integrating circular economy practices into all aspects of their businesses including consumption, product lifecycle, services and/or production methods.

Environmentally friendly tourism

Caibidil:

Volume One County » 5 Economic Development » 5.2 Economic Strategy for City & County » 5.2.5 Tourism, Creative Industries and Services

The Draft plan should promote sustainable tourism in a way that directly has a positive impact on the environment and accelerates Kilkenny's move to a circular economy.

The Plan should include an objective to develop strong links with tourism providers to encourage and incentivise environmentally conscious and responsible tourism.

Documents Attached: Níl

Teorainneacha Gafa ar an léarscáil: Níl