

**Managers Report and
Recommendations on
Submissions**

**Great Blasket Island
Local Area Plan**

**County Managers Report and
Recommendations on the
Submissions Received
During the
Consultation Phase of the Draft Plan**

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Chapter 1

Introduction - Legal Preamble and Process

1.0 Legal Preamble

Kerry County Council as Planning Authority has a duty to make a Development Plan for its functional area and to review it every six years. The legal basis for Development Plans is contained in the Planning and Development Act 2000. The County Development Plan sets out an overall strategy for the proper planning and sustainable development of the County. The Development Plan is particularly important because of its role in the assessment of planning applications. The Council's own developments cannot contravene the provisions of the Development Plan.

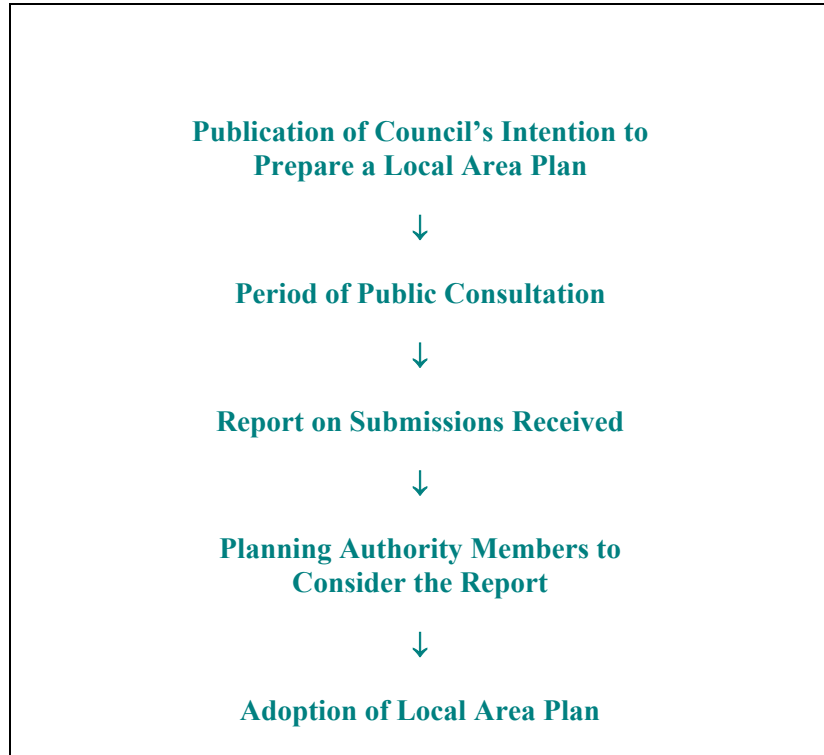
The Council also has the power under Section 18 of the Act to prepare a local area plan in respect of any particular area within the county. Given the unique and special nature of the Great Blasket Island, the Council considers it appropriate to set out a framework for the protection of the island's landscape characteristics and cultural, architectural and archaeological heritage.

The policies and objectives contained in this Draft Plan have been developed in recognition of the unique landscape and heritage of the island. The Plan when adopted by the Council will provide the overall plan for protection of the island. The Plan sets out the framework for the future on the quality of the environment its visitors will enjoy. The Plan must be seen therefore as a guidance document and a positive enabling resource for the spatial management of the island in accordance with the proper planning and sustainable development of the area as required by the provisions of the Planning and Development Act 2000.

2. Process

The process for the preparation of the plan is shown in Table 1. The draft plan was approved by the Council in June 2003 and, in conjunction with the publication of notice inviting submissions from the public, was placed on public display from 21st July to 1st September 2003.

Table 1



Ten submissions were received during this period and these are summarised hereunder together with responses and recommendations where considered appropriate. Having considered these, the Council must adopt the plan with or without modifications.

Chapter 2

Individual Submissions, Responses and Recommendations

Written Submission No. 1 **Ray Stagles, Berkshire, UK**

Extraordinarily beautiful and historic place deserves to be managed with great sensitivity and care. Concerned about the damage from use of motorised equipment on the island. Agrees with protective measures outlined in the plan. Considers dialogue with all concerned parties about the implementation of details of acceptable practice outlined in the plan to be most appropriate.

Response:

The submission is very supportive of the policies contained in the draft plan. It does not request or recommend any amendments.

Recommendation:

No amendment to the draft plan is recommended.

Written Submission No. 2 **Mick Loftus, Irish Underwater Council**

Represents over 80 diving clubs in Ireland. Concerned that the informal arrangement for diving clubs to camp in the area to the east of the pathway leading up from the pier would be curtailed. Clubs are aware of environmental issues and have treated the island with respect and have cleaned up after themselves. Boat access is not an issue for diving clubs who generally have their own craft that they moor outside the present harbour overnight. Agrees that a pedestrian pier is essential, possibly an unobtrusive floating structure that would move with the level of the tide.

Response:

Due to the engineering constraints, particularly in regard to wave heights and the strength of waves at this location as well as the tidal factors concerned, the construction of a floating pedestrian link is not a viable engineering solution. It is recognised, however, that the impact of any structure facilitating access must be minimised. This issue is addressed in objective DC 6-8 which states that the it is an objective of the council to *'facilitate the development of a pier where proposals are designed and constructed to mitigate any impacts on the ecological, cultural or landscape values of the island.'* It is

considered that this objective addresses the concerns expressed in the submission regarding the pier construction.

With regard to camping on the island, it is considered that such an activity, by virtue of its unregulated nature is incompatible with the overall conservation objectives of the plan.

Casual and temporary camping on the island will be regulated in accordance with the provisions of Article 6 of the Planning and Development Regulations 2001.

Recommendation:

It is recommended that the following objective be inserted as objective DC 6-29 (b)

Prohibit the development of a campsite on the island.

Written Submission No. 3

Pádraig Firtéar & Mícheál Ó'Cinnéide, Fondúireacht an Bhlascaod

1. Welcomes the proposal to seek World Heritage Site status and asks to ensure that this would receive priority in 2004 as in Par 2.1.2. of the Plan.
2. Welcomes the emphasis on the Irish language for the island (Par 1.1.25) and asks that a more explicit provision be included in the plan as an objective.
3. Accepts the proposal for new café and tourist facility but suggests that the scale of such should be similar to nearby buildings and sufficient for no more than 45-50 persons.
4. The visitor management plan for the island states that there will not be a campsite on the island but this is not specified in this plan. The Fondúireacht agrees with this prohibition in the interests of preserving the environment and the ruins on the island

Response:

- 1 It is an overall objective of the plan to facilitate the designation of the Great Blasket Island as a world heritage site.
- 2 The second point raised requested that a more explicit provision be included recognising the Irish Language. This is included in the recommendations below.
- 3 It is considered that the objectives in the plan to limit tourist facilities to the minimum necessary for visitor safety and comfort is appropriate and to specify limits at this stage would preempt proposals made in accordance with this objective.
- 4 With regard to camping on the island, it is considered that such an activity, by virtue of its unregulated nature is

incompatible with the overall conservation objectives of the plan.

Casual and temporary camping on the island will be regulated in accordance with the provisions of Article 6 of the Planning and Development Regulations 2001.

Recommendation:

It is recommended that the following be inserted as Objective OO 1-7

To promote the Irish Language in all aspects of development and life on the Island.

It is recommended that the following be inserted as Objective DC 6-29 (b)

Prohibit the development of a campsite on the island.

Written Submission No. 4

Gráinne & Tom O'Reilly, Mallow Co Cork

They have, over the years, camped on the island with their family for their annual holidays. Concerned that the proposal does not take account of the wishes of people like them who meet from year to year to go to the island and enjoy the unique Blasket Island experience gained through camping there. Request that a non-formal / non-commercial area away from the village be designated to facilitate the small number of campers who year after year visit the island. This would have no effect on the delicate eco-system, as there would be no additional showers, toilets etc.

Response:

With regard to camping on the island, it is considered that such an activity, by virtue of its unregulated nature is incompatible with the overall conservation objectives of the plan.

Casual and temporary camping on the island will be regulated in accordance with the provisions of Article 6 of the Planning and Development Regulations 2001.

Recommendation:

It is recommended that the following objective be inserted as objective DC 6-29 (b)

Prohibit the development of a campsite on the island.

Written Submission No. 5

Great Blasket Management Group

Requests modification of Chapter 6 (the Development Control chapter) to accommodate proposals of the owners to restore and provide basic facilities for their properties (within existing buildings and outside the “golden triangle”) and some new development for minimum services for visitors. Map and schedule of proposals submitted.

Response and Recommendation:

See response and recommendation to submission No 7 from the Department of the Environment, Heritage and Local Government.

Written Submission No. 6

Blasket Islands Dún Chaoin Ferry Co. Ltd.

1. Focus of the plan is too narrow and should include all the islands. Development should be kept to a minimum i.e. pier, public toilets / shelter, possible small medical and communications center.
2. No need or demand for enlarged café or for management and administrative buildings – these are available on the mainland. There are a number of contradictory elements in the plan which make excessive provision for development and will ruin the fragile environment. The approach of Fondúireacht for limited cultural and educational development in some old houses in the village is much more holistic.
3. Plan makes no mention of the role of the Heritage Council and their role in establishing management structures in conjunction with Kerry County Council should be re-examined. Role of Dúchas should be subservient to the management role of the Heritage Council / KCC. Flock of approx. 200 White Fronted Greenland Geese have disappeared from their over-wintering ground on Beginnish and the north side of the Great Blasket as well as Clogher Head and Sybil Head on the mainland.
4. Not enough emphasis on maintaining Dún Chaoin as the only access gateway to the island. This ferry service is an important part of the infrastructure. Attempt by the Blasket Island Management Group to encourage a new access gateway from Dingle is not in the best interests of the island and will make visitor management more difficult. This service should be limited to serving the hostel and café. With Dún Chaoin as the gateway for tourist traffic, then access is self-limiting. A local byelaw may be necessary to achieve this. Responsible local people should be involved as guardians of the site in line with modern European thinking on heritage sites. This would avoid the expense and burdens (e.g. living quarters) of a top-heavy bureaucratic type management regime. Local operators would provide a minibus shuttle service between the Heritage Centre and the pier at Dún Chaoin. This would alleviate parking difficulties near the pier. The present boat service from Dún Chaoin employs eleven local people. Imperative to maintain the status quo on maximum visitor numbers (400 per day) agreed

during the 1990's. Passenger boats will need to be upgraded. No provision in recent €8.5m allocation for this and the diversion of passengers to Dingle will have a negative affect on local operators' ability to improve existing standards and purchase new vessels. Will the use of the proposed pier be subject to landing fees? Is there a public / private partnership envisaged for the construction of the café / administration block? An enlarged café implies increased visitor numbers. Will there be a public / private partnership for ferry operators to purchase new vessels?

Appendix – Miscellaneous Notes on Plan

- 1 Put a freeze on all planning applications until plan is accepted.
- 2 There is a sub-species of the long-legged vole present on the island.
- 3 Greenland White Fronted Goose – Approx 200 on Beginnish until recently, used also graze on the north side of the island and Sybil Head (not mentioned in Dúchas in recent assessment).
- 4 Grey seal breeding period more accurately is September / October. Composition of colony controversial and needs further research (a bachelor “be happy get together” colony). Pupping sites begin at pebble beaches of Cuas an Bháid. Pups on Trá Bán are generally abandoned or sick.
- 5 Tober an Puncán should be restored to the state it was in prior to present piping and tankage.
- 6 First World war watchtower is a Martello Tower from Napoleonic era with marking stones subsequently scattered as a signal to First World War pilots.

Response:

It was decided in order to properly deal with development pressures on the Great Blasket Island that a local area plan was necessary. The other islands are included in the broader County Development Plan and are zoned as prime special amenity.

It is considered that the plan should make provision for the proper management of tourists to the island and also for facilities which facilitate the conservation and protection of the islands fragile environment.

This local area plan is a land use plan and is not a plan for the ongoing daily management of the island. On its adoption individual landowners will have to comply with the provisions of this plan with regard to development of their property. The plan deals with land-use policies on the island and does not deal with development or the regulation of private businesses off the island. Any planning application for development on the island will have to address the potential impact on the island of additional tourist numbers.

Planning applications for development on the island will be dealt with in accordance with the usual legislative requirements. There is no provision for putting a 'freeze' on planning applications.

It is accepted that information regarding the breeding season of the grey seal may be inaccurate. There are differing opinions from different sources as to the exact breeding season. A submission from the Irish Seal Sanctuary indicates that the peak breeding season extends from September through to January with peak pupping in October/November. This is indicative of the need for further research in this area.

The provision of water on this island is crucial to the concept of the island as a living island. It is important that it is used for the ongoing viability of the island.

Recommendation:

The section on the grey seal on page 22 should be modified as follows:

'The grey seal live on and around the Great Blasket Island. The island is home to at least one quarter of the total national grey seal population. The second largest breeding site in Ireland is located on the Island. The breeding season is thought to extend from September through to January'.

The following sentence should be deleted from section 3.2.9:

'Other building projects.....side of the island.'

Written Submission No. 7

Heritage and Planning Division, Department of the Environment, Heritage and Local Government

Compliments comprehensive document. Pleased with progress of Management group on partnership with all stakeholders to protect and conserve the Great Blasket Island. Suggests all references to Dúchas must now read "the Heritage Services". States that the achievement of World Heritage status could take "a protracted time frame".

Chapter 3 section 3.2.13 needs to cross reference Section 6.7 Objectives under Architectural Heritage (section 3.2.12) should also refer to Section 6.7 as well as Appendix C. This should also include reference to seeking the retention, in any development proposals relating to protected structures or within the Architectural Heritage Area, of appropriately qualified and / or experienced professionals and craftspeople to prepare, supervise and carry out preservation, renovation or restoration works. Any development proposals should be prepared to the highest standards as required both by the Planning and Development Regulations 2001 and Department of the Environment and Local Government Conservation Guidelines 1996. Applicants may be required to justify particular proposals in the light

of the restrictions on development necessary to ensure the preservation of the character of the individual structure, Architectural Conservation Area and the island as a whole.

Appendix B lists 21305108 as “remains of dwelling”. This appears to be former school and teacher’s house (structure no. 7 in Appendix C) Clarify for the record.

In Clause 3.1.1 insert the word “architectural” before “archaeological sites” and “(see 3.1.2)” after surveys.

In Clause 3.2.1 insert at the start of the paragraph which commences “ The architectural heritage.....” “A detailed architectural survey, including a condition survey of the Island, has been completed.”

The draft does not appear to allow for the re-roofing of some existing structures outside the core conservation area. This is considered essential to securing the agreement of all stakeholders and consequently, the success of plans for the future of the Blasket Island set out in the Forum Report of March 2002. The Department has no objection in principle to re-roofing some existing structures outside the core conservation area in a sympathetic manner and recommends that the local area plan be amended to facilitate such developments.

The Department suggests that Objective BH 3-10 be amended to read as follows:

“That any development involving any standing structures or any underground works shall require planning permission. Applications for such developments should be accompanied by an Archaeological Impact Assessment. This assessment shall be forwarded to the Heritage and Planning Division of the Department of the Environment, heritage and Local Government, together with a copy of the planning application”

Response:

It is considered that the suggestions and recommendations of this submission should be incorporated into the plan.

Recommendation:

Any reference to ‘Dúchas’ throughout the document should be modified to ‘The Heritage Services’

Alter objective BH 5-3 as follows

Delete ‘Permit restoration.....permission’ and replace with ‘permit restoration, renovation and conservation of structures outside the core conservation area (as indicated on map 2) in accordance with the recommendations of Appendix C. Any development proposals should be prepared to the highest standards as required both by the planning and development regulations 2001 and the Department of the Environment and Local Government Conservation Guidelines 1996. Applicants may be required to justify particular proposals in the

light of the restrictions on development necessary to ensure the preservation of the character of the individual structure, architectural conservation area and the island as a whole.’

Delete ‘Permit stabilisation and.....permission.’ Insert the following:

Permit stabilisation of the dwellings inside the core conservation area (as indicated on map 2) following best restoration and conservation practice.

Insert the following as the first line of section 3.2.13:

‘This section should be read in conjunction with chapter 6, and in particular section 6.7 of this plan.’

Insert the following as the first line of section 6.7:

‘This section should be read in conjunction with 3.2.13 of this plan,’

Objective BH 3-10(c) should be amended to read:

‘That any development involving any standing structures or any underground works shall require planning permission. Applications for such development should be accompanied by an Archaeological Impact Assessment. This assessment shall be forwarded to the Heritage and Planning Division of the Department of the Environment, Heritage and Local Government, together with the planning application.’

Insert the following as the first line of Section 3.2.1:

‘A detailed Architectural survey including a condition survey of the island has been completed.’

The first three lines of para. 3.1.1 should be replaced with the following:

‘There are currently 15 architectural/ archaeological sites on the Great Blasket Island, which are listed in the Record of Monuments and Places and are shown on map 1. The island has not been subject to methodical archaeological surveys (see 3.2.1).

Three of the architectural/archaeological sites are the houses of island writers Peig Sayers, Tomás O Criomhthain and Muiris O Súilleabháin.’

Insert ‘ and Map 2’ in the last line of 3.2.2.

Delete the following line from the second paragraph of 6.7.1:

‘in general, only properties where the roof and external walls are intact have been identified for restoration.’

Objective DC 6-29 should have the word ‘new’ inserted before houses.

Map 2 should be modified to indicate the ‘Core conservation area’.

Replace the word ‘contained’ with ‘outlined’ in the second paragraph of section 6.7.1.

Irish Seal Sanctuary

Recommends that the council insist on full independent and impartial information with most expert environmental impact assessment available, prior to all new development or implementation of new management practice. Unauthorised development may already compromise the World Heritage Site application.

Local literature references, anecdotal reports, partial scientific reviews by NPWS and UCC suggest a seal population declining over half a century from c.2000 to < 400, on current observations. Factors seem to be externally diminished food supply and internally disturbance. Profile of pups coming to ISS over the last decade has changed nationally from pups the victims of storms and misadventure to weanlings / juveniles that are starving and with antibiotic resistance. A comprehensive study of the grey seal population is a prerequisite for further minimal planning and development and for the management plan.

ISS suggests the peak-breeding period for the grey seal is from September to January with peak pupping in October / November. Pups have been born outside this period and have come into the ISS in mid-summer. If this is true, and it must be subject to research and to Environmental Impact Assessment, it dovetails nicely with visitor management and allows visitors to enjoy the beach in the high summer season and to close off pupping sites, moult sites and haul-out sites from September through to April, allowing pups to attain independence.

The resident grey seal population is one of the great distinctive features of the Blasket experience and the population's occupancy and use of even the Trá Bán should not be disturbed.

Puffins are omitted from list of wildlife, as are Greenland White Fronted Geese. Research is needed on these populations.

Direct landing of visitors is likely to introduce rats to the island the results of which would be catastrophic for ground-nesting birds. Increased habitation, visitor numbers, waste generation would all exacerbate this situation

The role of grazing sheep and rabbits needs to be assessed and their impact on both flora and fauna.

ISS welcomes the proposal for an observatory and suggests a programme managed or augmented by ISS / Irish Whale and Dolphin Group / Birdwatch volunteers should accompany this proposal. This would provide baseline and ongoing data, heretofore missing and potentially much more valuable research.

A buffer zone of 100 miles should be imposed and enforced to exclude all hazardous cargo and materials from the protected area. Remedial action would be of little benefit in such a fragile, vulnerable and hostile environment even were the local authority or Ireland better equipped to deal with such disasters.

ISS observers have noted and draw KCC's attention to unauthorised developments already running counter to the plan i.e. extensive new piping and valves running over ground, Traffic cones marking landing site on Trá Bán with tracks coming from the sea, burning of waste, sand and gravel removal.

Response:

Any application for a pier will need the approval of Bord Pleanala and such an application will be accompanied by an environmental impact assessment. The issue of rats coming onto the island will need to be addressed in that document.

The land-use plan contains the policies and objectives for the land-uses on the islands and provides the policy framework within which applications for development will be considered. The plan cannot instruct specific works such as fencing off the children's graveyard, even though it promoted conservation in this area. This is a function for the landowners of the lands in question.

The land-use plan covers the area of the island and the provision of buffer zones in maritime areas is outside the scope of the plan.

Unauthorised development on the island will be dealt with in accordance with the provisions of the Planning and Development Act 2000.

Recommendation:

The section on the grey seal on page 22 should be modified as follows:

'The grey seal live on and around the Great Blasket Island. The island is home to at least one quarter of the total national grey seal population. The second largest breeding site in Ireland is located on the Island. The breeding season is thought to extend from September through to January'.

Written Submission No. 9

Michael O'Rourke, Irish Sub Aqua Club

- 1 Development of a large-scale pier could lead to introduction of rats to the island and asks what precautions are needed to prevent this from commercial landings directly onto the pier. Suggests restriction on the size of boat to prevent the possibility of a large vessel with capacity for large passenger numbers (>100), which could lead to breaches of the maximum numbers of visitors (400).
- 2 What provisions and guidelines will be made for accommodating those who stay overnight i.e. hostel / B&B, house owners and campers? Suggests designated area put

aside to accommodate campers to ensure the preservation of the village and bring some control to camping on the island. Site should not have permanent shower facilities. As World Heritage status also extends below the waterline including the harbour area that offers particularly fascinating night diving, the pier development needs professional environmental impact study.

- 3 States that the number of Grey Seals seems to be reducing year by year and is concerned that the new pier with consequent increased traffic will cause stress to young seals at the beach area. What provision will be made to ensure proper harmony between the commercial development proposed and the protection of the natural habitat of the seals on the beach area? The Manx Shearwater live in burrows on the ground and the introduction of rats will seriously jeopardise the already low numbers. What provision will be made to reduce disturbance to Long Legged Field Mouse while reconstruction work is taking place?
- 4 Availability of camping to the club is important as it reduces time spent at sea in a physically demanding activity. The island provides the best solution to the club's emergency plan as helicopter assistance can be managed on the island to evacuate to the chamber in Galway. The Bay area in front of the beach allows safe sheltered mooring for their craft. The lee side of the island allows safe travel to dive sites which would not be available if traveling from the mainland.
- 5 They have facilitated the movement of people off the island when ferries have not run due to weather and the hostel has been unable to accommodate them. Were able to rescue two children on 8th August this year who were lost at sea. Club is in a position to give first aid where needed.
- 6 Suggests that the childrens' burial ground should be fenced off and clearly marked immediately to prevent camping on it by visitors unaware of it.
- 7 Numerous wrecks in the area already recorded. Club has plans to continue to document these and need to use the island as a base for this.
- 8 What provision is there to reduce the drawing of sand from the beach as a building material? What provision to stop further erosion of beach headland due to vehicles drawing beach materials with damage to terrestrial and maritime habitats, flora and fauna? Road from beach area will increase erosion of beach cliff area. Foreshore Act needs to be strictly enforced.
- 9 Asks what accommodation can be made so that island experience can remain available to club and other visitors if World Heritage status is achieved.
- 10 Because of application for World heritage status, the club is cataloging the island's diving features. What provision can be made to allow them to continue from their base camp in collecting information?

Response:

Any application for a pier will need the approval of Bord Pleanála and such an application will be accompanied by an environmental impact assessment. The issue of rats coming onto the island will need to be addressed in that document.

The land-use plan contains the policies and objectives for the land-uses on the islands and provides the policy framework within which applications for development will be considered. The plan cannot instruct specific works such as fencing off the children's graveyard, even though it promotes conservation in this area. This is a function for the landowners of the lands in question.

The land-use plan covers the area of the island and the provision of buffer zones in maritime areas is outside the scope of the plan.

Unauthorised development on the island will be dealt with in accordance with the provisions of the Planning and Development Act 2000.

With regard to camping on the island, it is considered that such an activity, by virtue of its unregulated nature is incompatible with the overall conservation objectives of the plan.

Casual and temporary camping on the island will be regulated in accordance with the provisions of Article 6 of the Planning and Development Regulations 2001.

Recommendation:

No amendments to the draft plan are recommended

Written Submission No. 10

Nick Gray, email address noodles@postmaster.co.uk

Understands that the new Great Blasket Island area plan will forbid camping on the island.

Would like to register objection to this as he and many friends feel that camping has no detrimental effect on the island environment. States it is a very special experience to stay overnight on Great Blasket, even more so under canvas, and to forbid this completely would be restrictive, unnecessary and not at all in keeping with the spirit of the place.

Response:

With regard to camping on the island, it is considered that such an activity, by virtue of its unregulated nature is incompatible with the overall conservation objectives of the plan.

Casual and temporary camping on the island will be regulated in accordance with the provisions of Article 6 of the Planning and Development Regulations 2001.

Recommendation:

It is recommended that the following objective be inserted as objective DC 6-29 (b)

Prohibit the development of a campsite on the island.

Chapter 3

Summary of Recommendations

It is recommended that the following objective be inserted as objective DC 6-29 (b)

“Prohibit the development of a campsite on the island.”

It is recommended that the following be inserted as Objective OO 1-7

“To promote the Irish Language in all aspects of development and life on the Island.”

The section on the grey seal on page 22 should be modified as follows:

“The grey seal live on and around the Great Blasket Island. The island is home to at least one quarter of the total national grey seal population. The second largest breeding site in Ireland is located on the Island. The breeding season is thought to extend from September through to January”.

The following sentence should be deleted from section 3.2.9:

‘Other building projects.....side of the island.’

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Alter objective BH 5-3 as follows

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Local Government Conservation Guidelines 1996. Applicants may be required to justify particular proposals in the light of the restrictions on development necessary to ensure the preservation of the character of the individual structure, architectural conservation area and the island as a whole.’

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Three of the architectural / archaeological sites are the houses of island writers Peig Sayers, Tomás O Criomhthain and Muiris O Súilleabháin.’

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Delete the following line from the second paragraph of 6.7.1:
‘in general, only properties where the roof and external walls are intact have been identified for restoration.’

Objective DC 6-29 should have the word ‘new’ inserted before houses.

Map 2 should be modified to indicate the ‘Core Conservation Area’.

Replace the word ‘contained’ with ‘outlined’ in the second paragraph of section 6.7.1.