

Kerry County Council
Planning Department
Rathass,
Tralee,
Co. Kerry

Date: 31st July 2026

RE: APPLICATION FOR LARGE SCALE RESIDENTIAL IN RESPECT OF PROPOSED RESIDENTIAL DEVELOPMENT ON LANDS AT ARDSHANAVOOLY, KILLARNEY, CO. KERRY

Dear Sir/Madam,

On behalf of our client, Wrightwood Developments Ltd, we enclose herewith a Large Scale Residential Development application to Kerry County Council on lands at Ardshanavooly, Killarney, Co. Kerry, for the following development proposal:

1. Construction of a 124 no. dwellings in a mix of duplex, maisonette and apartment typologies comprising 16 no. 1 bed apartments, 6 no. 2 bed apartments, 16 no. 1 bed duplex apartments, 16 no. 2 bed duplex maisonettes, 33 no. 2 bed duplex apartments, 33 no. 3 bed maisonettes and 4 no. 3 bed terrace houses, all in building heights ranging from 2 to 4 storeys.
2. A total of 143 no. surface car parking spaces, including 4 no. car-share parking spaces, 6 no. visitor spaces, and 5 no. assigned Part M/accessible spaces.
3. Bicycle parking comprising of 272 no spaces in total, comprising 118 no. spaces within the private open space of ground floor residential units and 102 no. spaces within secure sheltered structures and designated secure bicycle parking areas, and 52 no. short stay/visitor spaces.
4. 3,636 sq.m of public open space, including arrival pocket park, central pocket park and amenity landscape areas (including 117 sq.m of play), grass lawns, kickabout areas, picnic areas and seating areas;
5. 956 sq.m of communal external open space, including seating areas, nature trails, and amenity grass lawns.
6. Additional environmental open space of 1,790 sq.m, including landscape buffers, protection and enhancement of existing hedgerows and trees.
7. A new vehicular, pedestrian and cyclist access from the existing estate road adjoining the site to the south.
8. Infrastructure works to serve the proposed development to include the internal road and footpath network, ESB cabinets/substations/switchrooms, site and external building lighting, site drainage works, hard and soft landscaping, boundary treatments, communal bin stores, and all ancillary site services and development works above and below ground.

We enclose the following:

No	Report / Document	By
1	Cover Letter	Foundation
2	Planning Report	Foundation
3	Response to LRD Opinion	Foundation
4	Form 19 Application Form	Foundation
5	Planning Application Form	Foundation

6	Certificate of Incorporation	N/A
7	Site Notice	Foundation
8	Newspaper Notice	Foundation
9	Social and Community Infrastructure Audit Report	Foundation
10	Part V Proposal	Foundation
11	Letter of Consent	Michael and Dermot Lyne
12	Architectural Drawings and Drawing Schedule	R. Graham O'Sullivan Architect & DM Design
13	Design Statement	R. Graham O'Sullivan Architect
14	Housing Quality Assessment	R Graham O'Sullivan Architect
15	Schedule of Accommodation	R Graham O'Sullivan Architect
16	Engineering Assessment and Drainage Design Report	TPCE
17	Engineering Drawings (inc. taking in charge and phasing) and Drawing Register	TPCE
18	Calculation Sheets	TPCE
19	Construction Environmental Management Plan	TPCE
20	On-Site Soil Infiltration Testing Report	TPCE
21	Site Specific Flood Risk Assessment	Donal Moynihan
22	Landscape Drawings and Drawing Register	Gannon & Associates
23	Landscape Design Rationale	Gannon & Associates
24	Climate Action and Energy (Part L) Analysis Report	DKPI
25	Daylight and Sunlight Assessment Report	DKPI
26	External (Public) Lighting Report	DKPI
27	Townscape and Visual Impact Assessment (and Photomontages)	Purser (with Photomontages by IMG Designs)
28	EIA Screening Report	Malone O'Regan
29	Ecological Impact Assessment	Malone O'Regan
30	Appropriate Assessment Stage 1 Screening Report	Malone O'Regan
31	Arboricultural Assessment and Impact Report	CMK Forestry Consultants
32	Arboricultural Assessment Constraints Drawing - TARD006-XX-DR-CMK-ARB-101	CMK Forestry Consultants
33	Arboricultural Impact & Tree Protection Drawing - TARD006-A-DR-CMK-ARB-102	CMK Forestry Consultants
34	Traffic and Transportation Assessment	MHL
35	Mobility Management Plan	MHL
36	DMURS Statement of Compliance	MHL
37	Stage 1 Road Safety Audit	MHL
38	Operational Waste Management Plan	MHL
39	MHL Drawing 24078TT-FT1-D01 (Fire Truck Autotrack) and Drawing 24078TT-RT1-D01 (Refuse Truck Autotrack)	MHL
40	Archaeological Test Trenching and Impact Assessment	Frank Coyne

The proposed development has evolved from inception through an iterative design process with a multi-disciplinary team and has been strongly influenced and informed by the relevant policy context. The development proposal is therefore 'plan-led' and is considered, to be both fully responsive to the site context and characteristics, and to the policy context.

The sensitive design approach, particularly the controlled height and scale of the proposals, ensure that the development can assimilate into the context and environment, making a positive contribution to compact

growth and housing delivery, whilst also ensuring that there is no significant negative ecological or environmental impact. The proposed development will provide a high quality new community in Killarney.

We note that a previous application for an almost identical development under Reg. Ref: 26/6009 was withdrawn. There are now minor amendments to the scheme relating to Blocks A, L and K, which have been redesigned to accommodate units which qualify for the affordable housing scheme. These new units total 9 no. units in Block A, 7 no. units in Block L and 7 no. units in Block M, giving a total of 23 no. units. Of these 23 no. an overall 20 no. 3 bed townhouse units which are being offered as affordable housing as part of this current scheme. The overall numbers have been reduced from 124 (under Reg. Ref: 26/6009) to 123 no. in this current application.

The above change also allows a reduction in massing of the Block (Block L) adjacent to the western boundary (reduction from a three storey duplex block to a now a 2 storey townhouse terrace), and thus taking the opportunity to address some concerns raised in submissions on the previous application relating to proposed height at this part of the site.

In terms of wastewater and stormwater, for clarity, we note the following points in response to items which were raised in a further information request under Reg. Ref: 26/6009 by Kerry County Council prior to withdrawal.

- Having engaged with Uisce Eireann, via a pre-connection enquiry, it has been confirmed that the connection to the public water and wastewater infrastructure is wholly feasible.
- In terms of the proposed treatment of stormwater water from the site, there has been a firm commitment from the outset of the project, and which is provided for within the design methodology as submitted, that there is no discharge of storm water from this proposed development, and that all storm water shall be treated within the site, via infiltration methods, and natural SUDs solutions. There is no stormwater connection needed, nor required, from this site.
- In relation to the Kerry County Development Plan (KCDP), Variation No 2, S.2.1.9.4.3 (drainage), as cited within the Further Information Request letter, it is noted that Uisce Eireann have advised that their Asset Planning team are currently looking for an alternative primary discharge location for the Killarney Waste Water Treatment Plant (WWTP). It is also noted that it is an objective for the Council to facilitate and support Uisce Eireann, who have completed a Drainage Area Plan for Killarney, to help address nutrient loss to watercourses from storm water overflows during rainfall events. It is stated, within S.2.1.9.4.3, that Kerry County Council supports the implementation of actions arising, which would address capacity issues in the sewer network and support sustainable development. Further, that the KCDP supports the provision of nature-based solutions to storm water and rainwater management.
- The importance of providing sustainable, nature-based solutions, has been the central design philosophy for the stormwater treatment and management, within the site, as comprehensively addressed within the enclosed 'Engineering Assessment and Drainage Design' report submitted.
- Uisce Eireann reviewed the application, and in the contextual framework of their own assets and sewer network capacity, have determined that proposal is feasible without any infrastructure upgrades whatsoever. We have demonstrated compliance with (KCDP), Variation No 2, s2.1.9.3, regarding our approach to the storm water design, in providing a sustainable, nature -based SUDs solution, utilising complete on-site treatment resulting in no storm water discharge from the site, mitigated against flood risk, promoted biodiversity, addressed water quality, and taken cognisance of climate change and adaption within the design. We have therefore complied with all aspects of the KCDP, and adhered to the objectives of s2.1.9.4.3.
- We wish to emphasise that any issues being experienced beyond the WWTP (i.e. after water enters the WWTP) is entirely a matter outside the control or influence of the applicant. It is clear from the County Development Plan references above that there are other studies underway to address this

issue, such issue being entirely unrelated to the proposed development. It is further clear that the proposed development will discharge foul water only (no surface or stormwater) to a WWTP which has capacity to accept it.

- It is noted for clarity that the Department of Housing, Local Government and Heritage submission on the now withdrawn planning application stated that *“While the Killarney WWTP appears to have capacity for treatment for the extra PPE which would be required from this development, there is a problem with the volume of storm-water overflow discharges from holding tanks at the WWTP, which discharge via the Folly Stream into the Ross Bay part of the SAC1. It is important that the development does not result in an additional contribution to storm overflow discharges to Ross Bay”*. It is not clear that the Department understood that the stormwater for the proposed development will not discharge to the WWTP.
- Notwithstanding the above, we understand that part of the wider measures that may be undertaken by the local authority to address the post WWTP issues is the separating out of the combined sewer on Park Road to separate storm/surface and foul water sewers, to assist with discharging less surface/storm water to the WWTP. In this regard, the applicant is willing to accept a condition under Section 48(2)(c) of the Planning and Development Act 2000, as amended, which requires the applicant to make a reasonable contribution to the cost of the works for separating the sewers, on the basis that the removal of this storm/surface water from the combined sewer will reduce discharge of same to the WWTP and ensure that the foul loading from the proposed development will not increase overall loading to the WWTP.

In addition to the above, we note that item 2 of the further information request on the previous application was as follows:

“You are requested to submit a revised AA Screening report and where necessary a NIS, taking into account matters raised in the submission received from the Department of Housing, Local Government and Heritage and any amendments to the proposal arising from this request for further information, as appropriate.

We refer to the enclosed correspondence from Malone O'Regan Environmental at Appendix 1 dated 25th June 2026 which concludes that:

“it remains the professional opinion of MOR Environmental that the Proposed Development is not likely to have significant effects on any European site, either alone or in combination with other plans or projects. Therefore, progression to Stage 2 of the Appropriate Assessment process, Natura Impact Statement ('NIS'), was not required at the time of application and is not required in response to this Request for Further Information”.

Having regard to the above, all issues raised in the further information request on the previous application have been fully addressed in this current application.

Yours faithfully,



Robert Keran

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FOUND^ATION
THE PINNACLE IN PLANNING AND PROJECT MANAGEMENT

Appendix 1

Malone O'Regan Letter

25th June 2026

Planning Section
Kerry County Council
County Buildings,
Ratass,
Tralee,
Co. Kerry

Planning Reference: 26/6009

MOR Environmental Ref: E2329

Re: PL Ref No: 26/60009 - Response to Request for Further Information

Dear Sir or Madam,

The following response has been prepared by Malone O'Regan Environmental ('MOR Environmental'), on behalf of Wrightwood Development Ltd ('the Applicant') in response to the Request for Further Information ('RFI') issued by Kerry County Council dated the 9th March 2026 in respect of their planning application for a proposed Large Scale Residential Development ('LRD') on a site circa ('ca.') 2.23 hectares ('ha') in size at Ardshanavooley, Killarney, Co. Kerry (Ref No.: 26/60009).

Please note that MOR Environmental have prepared this response in relation to Item (ii) of the RFI:

Item (ii): You are requested to submit a revised AA Screening report and where necessary a NIS, taking into account matters raised in the submission received from the Department of Housing, Local Government and Heritage and any amendments to the proposal arising from this request for further information, as appropriate.

Please see below an extract of the submission received by the Department of Housing, Local Government and Heritage. Under the Nature Conservation, the following was received:

'Killarney National Park SAC: foul water discharges

The WWTP-treated effluent from this development will discharge into the Ross Bay (Lough Leane) part of Killarney National Park, Macgillycuddy's Reeks and Caragh River catchment candidate Special Area of Conservation (cSAC no. 365). This site is designated for, amongst other habitats and species, slender naiad (an aquatic plant), Killarney shad, salmon, sea lamprey, river lamprey, brook lamprey and otter. Conservation objectives for this site are available at <https://www.npws.ie/protected-sites/sac/000365>. While the Killarney WWTP appears to have capacity for treatment for the extra PPE which would be required from this development, there is a problem with the volume of storm-water overflow discharges from holding tanks at the WWTP, which discharge via the Folly Stream into the Ross Bay part of the SAC1. It is important that the development does not result in an additional contribution to storm overflow discharges to Ross Bay.'

RFI Item 1 (ii): Revised AA Screening

MOR Environmental maintains that the conclusions of the Appropriate Assessment ('AA') Screening Report submitted as part of the planning application remain valid and unchanged.

Consequently, a revised Appropriate Assessment Screening Report is not required in response to this RFI.

MOR Environmental would like to clarify that all drainage-related aspects, as outlined in Section 3.3.1 and associated potential impact pathways, were comprehensively assessed within the submitted AA. The assessment considered all relevant source-pathway-receptor linkages and evaluated the potential for impact pathways between the Proposed Development and European sites.

Furthermore, as outlined in the Engineering Assessment and Drainage Design Report prepared by Teicniuil-Priory Consulting Engineers Ltd and submitted as part of the overall planning application, there has been a firm commitment from the outset of the project, that there will be no discharge of stormwater from this Proposed Development.

All stormwater generated by the development will be managed entirely within the Site, via infiltration methods and natural Sustainable urban Drainage system ("SUDs") solutions. No stormwater connection is needed, nor required, from this Site. In this respect, no stormwater from this development will enter the network connecting to the Killarney Wastewater Treatment Plant ("WWTP"). Accordingly, no stormwater arising from the Proposed Development will enter the sewer network serving Killarney WWTP. The development will therefore not contribute to stormwater flows entering the WWTP and will not increase the frequency, duration, or volume of stormwater overflow events associated with the treatment plant. This design measure formed an integral part of the AA and remains unchanged.

The concern raised regarding storm overflow discharges from holding tanks at the WWTP to the Folly Stream and, subsequently, to Ross Bay is therefore not directly relevant to the Proposed Development. Given that the development will not discharge stormwater to the public network, it will not result in any additional contribution, either directly or indirectly, to storm overflow discharges to Ross Bay.

Furthermore, the planning application demonstrates that adequate wastewater treatment capacity is available within the Killarney WWTP to accommodate the proposed foul water loading associated with the development. Therefore, the conclusion of the AA remains valid, and there is no evidence that the Proposed Development would give rise to any adverse effects on the integrity of the Killarney National Park, Macgillicuddy's Reeks and Caragh River Catchment Special Area of Conservation ("SAC"), either alone or in combination with other plans or projects.

MOR Environmental therefore confirms that no new or previously unidentified impact pathways have been identified that would alter the findings of the assessment and the conclusions of the submitted AA remain valid.

Accordingly, it remains the professional opinion of MOR Environmental that the Proposed Development is not likely to have significant effects on any European site, either alone or in combination with other plans or projects. Therefore, progression to Stage 2 of the Appropriate Assessment process, Natura Impact Statement ("NIS"), was not required at the time of application and is not required in response to this Request for Further Information.

Yours sincerely,

for Malone O'Regan Environmental



Kathryn Broderick
Principal Ecologist