

PLANNING STATEMENT

**In respect of a Proposed Large Scale Residential
Development on Lands at Ardshanavooly, Killarney, Co. Kerry**

FOUNDATION
THE PINNACLE IN PLANNING AND PROJECT MANAGEMENT

Client: Wrightwood Development Limited

Date: July 2026

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EXECUTIVE SUMMARY

- The application site comprises c. 2.23 hectares at Ardshanavooly, located to the north-east of Killarney town centre. It is bounded to the south by existing residential development at Burr Ridge and an infill housing scheme of 8 units under construction, to the west by Dennehy's Bohereen, to the north by the Deerpark pitch and putt club, and to the east by a greenfield site.
- The proposed development provides a total of 123 no. dwellings in a mix of duplex, maisonette and apartment typologies comprising 16 no. 1 bed apartments, 6 no. 2 bed apartments, 11 no. 1 bed duplex apartments, 11 no. 2 bed duplex maisonettes, 28 no. 2 bed duplex apartments, 28 no. 3 bed duplex maisonettes and 23 no. 3 bed terrace houses, all in building heights ranging from 2 to 4 storeys.
- 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 Ref: 26/6009 was withdrawn.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.
- The design approach delivers a compact and integrated neighbourhood structured around open space and permeability. A clear hierarchy of streets and shared surfaces prioritises pedestrians and cyclists, with passive surveillance and frontage treatments enhancing safety and social interaction. The massing strategy varies from two to four storeys, balancing density with human-scaled streetscapes.
- A robust landscape and open space strategy underpins the scheme, with 3,600 sqm of public open space (16% of the site area) provided as a connected network of parks and amenity area.
- A central "green spine" preserves and enhances an existing north-south hedgerow, paired with a walk/cycleway to create a multifunctional linear park
- Additional communal gardens (956 sqm) and biodiversity zones are strategically positioned, ensuring both ecological value and recreational amenity
- Design quality is embedded in materials, finishes, and layout, which integrate with the established character of Killarney while introducing contemporary elements for identity and legibility. The varied typologies respond to site topography and edges, with duplexes framing internal spaces and terraced houses ensuring softer transitions at boundaries.
- The development incorporates Sustainable Urban Drainage Systems (SuDS), including rain gardens, tree pits, and attenuation designed for the 1-in-100-year storm

event. These measures strengthen resilience to climate impacts while enhancing biodiversity and public amenity

- Social and affordable housing obligations will be met under Part V, with the final quantum and delivery mechanism to be agreed in consultation with Kerry County Council.
- The proposal aligns with national, regional, and local planning policy. It reflects the aims of Project Ireland 2040, Housing for All, and the Urban Development & Building Height Guidelines, which support increased density and building heights in town locations
- At county level, the scheme is consistent with the Kerry County Development Plan and the Killarney Local Area Plan, which encourage compact growth, sustainable transport, and high-quality design-led housing.
- In summary, the scheme represents a plan-led, sustainable development that will deliver 123 homes within walking distance of Killarney town centre. It integrates housing, public and communal open space, sustainable infrastructure, and community facilities, contributing positively to the growth and character of Killarney while complying with the relevant policy framework.

1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by Foundation on behalf of the applicant, Wrightwood Developments Limited, in support of a Large Scale Residential Development application for a residential development scheme on lands at Ardshanavooly, Killarney, Co. Kerry,
- 1.2 The report has been authored by Robert Keran, of Foundation. Robert holds a BSc in Spatial Planning, a Diploma in Project Management, a BA in Law, an LLB (Law), and is a chartered member of the Irish Planning Institute.
- 1.3 The proposed development at a 2.23-hectare site comprises of:
 - (i) Construction of a 123 no. dwellings in a mix of duplex, maisonette and apartment typologies comprising 16 no. 1 bed apartments, 6 no. 2 bed apartments, 11 no. 1 bed duplex apartments, 11 no. 2 bed duplex maisonettes, 28 no. 2 bed duplex apartments, 28 no. 3 bed duplex maisonettes and 23 no. 3 bed terrace houses, all in building heights ranging from 2 to 4 storeys.
 - (ii) A total of 139 no. surface car parking spaces, including 4 no. car-share parking spaces, 6 no. visitor spaces, and 5 no. assigned Part M/accessible spaces.
 - (iii) Bicycle parking comprising of 272 no spaces in total, comprising 124 no. spaces within the private open space of ground floor residential units and 96 no. spaces within secure sheltered structures and designated secure bicycle parking areas, and 52 no. short stay/visitor spaces.
 - (iv) 3,600 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;
 - (v) 956 sq.m of communal external open space, including seating areas, nature trails, and amenity grass lawns.
 - (vi) Additional environmental open space of 1,790 sq.m, including landscape buffers, protection and enhancement of existing hedgerows and trees.
 - (vii) A new vehicular, pedestrian and cyclist access from the existing estate road adjoining the site to the south.
 - (viii) 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.
- 1.4 This report sets out the following:
 - Site Location and Description
 - Description of Proposed Development
 - Relevant Planning History
 - Pre-application Consultation
 - Relevant National and Regional Planning Policy

- Relevant Local Planning Policy Context
- Assessment of Proposed Development in Planning Terms
- Summary and Conclusion

1.5 This Planning Statement has been prepared to assess the prospective application proposals against the relevant provisions of the statutory Development Plan and, Local Area Plan, Kerry County Development Plan and Section 28 Guidelines, which are the relevant statutory documents against which the development will be considered. This Planning Statement should be read in conjunction with the additional supporting reports that accompany this application pack.

2.0 SITE LOCATION & DESCRIPTION

- 2.1 The site is located to the north-east of Killarney town centre. The site is circa 2.23 hectares. It is bound to the south by existing residential development at Burr Ridge. Immediately to the south is a small infill housing development of 8 no. units, currently under construction.
- 2.2 To the west by Dennehy's Bohereen which accommodates lower density housing, to the north by Deerpark pitch and putt club, and to the east by a greenfield site.
- 2.3 The site is in agricultural use for grazing and is reasonably flat, with a small (circa 1 metre) fall from north to south). The site boundaries are characterised by low quality scrub hedgerow with occasional mature trees. The site itself, other than the boundaries, does not contain any trees or hedgerows.
- 2.4 There is an existing access road abutting the site to the south, from Burr Ridge. This is turn leads to Park Road to the south, with an unsignalized T-junction.



Figure 1 - Site Location (Outlined in Red)

- 2.5 There are a range of services and facilities in the area. Deerpark Retail Park is a short distance to the east, and includes a Tesco Superstore, Marks and Spencers, Boots and Dealz. The Onniplek Cinema is a short distance to the south, with a McDonald's adjacent.
- 2.6 The site is in very close proximity to Killarney town centre, the train station and bus station, with all being within a 10 – 15 minute walking distance or a 2 - 5 minute cycle.



Figure 2 – Viewpoint on Approach to Site Entrance through Friary Downs



Figure 3 – Viewpoint of Proposed Entrance to Site



Figure 4 & 5 – Viewpoint of site from the western boundary along Dennehy's Bohereen

3.0 DESCRIPTION OF PROPOSED DEVELOPMENT

General Description

- 3.1 The proposed development at a 2.23 hectare site comprises of:
- (i) Construction of a 123 no. dwellings in a mix of duplex, maisonette and apartment typologies comprising 16 no. 1 bed apartments, 6 no. 2 bed apartments, 11 no. 1 bed duplex apartments, 11 no. 2 bed duplex maisonettes, 28 no. 2 bed duplex apartments, 28 no. 3 bed duplex maisonettes and 23 no. 3 bed terrace houses, all in building heights ranging from 2 to 4 storeys.
 - (ii) A total of 139 no. surface car parking spaces, including 4 no. car-share parking spaces, 6 no. visitor spaces, and 5 no. assigned Part M/accessible spaces.
 - (iii) Bicycle parking comprising of 272 no spaces in total, comprising 124 no. spaces within the private open space of ground floor residential units and 96 no. spaces within secure sheltered structures and designated secure bicycle parking areas, and 52 no. short stay/visitor spaces.
 - (iv) 3,600 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;
 - (v) 956 sq.m of communal external open space, including seating areas, nature trails, and amenity grass lawns.
 - (vi) Additional environmental open space of 1,790 sq.m, including landscape buffers, protection and enhancement of existing hedgerows and trees.
 - (vii) A new vehicular, pedestrian and cyclist access from the existing estate road adjoining the site to the south.
 - (viii) 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.
- 3.2 The proposed development has a plot ratio of 0.58 and a site coverage of 25.9%.

Site Layout

- 3.3 The proposed layout is structured around key character areas, each defined by areas of open space that ensures south-facing orientation and good sunlight access. This configuration provides a soft green buffer to the existing housing to the south of site and integrates with the surrounding neighbourhood fabric.



Figure 6 – Proposed Site Layout Plan

- 3.4 A network of pedestrian- and cycle-friendly routes, including a north–south greenway linking the site through to the existing estate, enhances connectivity and permeability across the site.
- 3.5 The development principles are rooted in creating a compact, well-integrated community that balances residential growth with sustainability and placemaking. The layout reflects Kerry County Development Plan objectives, focusing on low-medium rise, medium-density housing while respecting the site's immediate surroundings
- 3.6 Key design drivers include public open space as focal points, permeability with passive surveillance, and a varied housing mix to meet local demand. Provisions for sustainable transport, including bicycle infrastructure and moderated car parking, are embedded, while SuDS and landscaped open spaces are used to manage drainage, support biodiversity, and reinforce the ecological character of the site

Access, Movement and Parking

Pedestrian and Cyclist

- 3.7 Pedestrian and cyclist movement are prioritised across the site, with the main entrance from the southern edge of the site providing access through for pedestrian and cyclist ways along both dedicated walkways and internal, shared surface areas in the development.

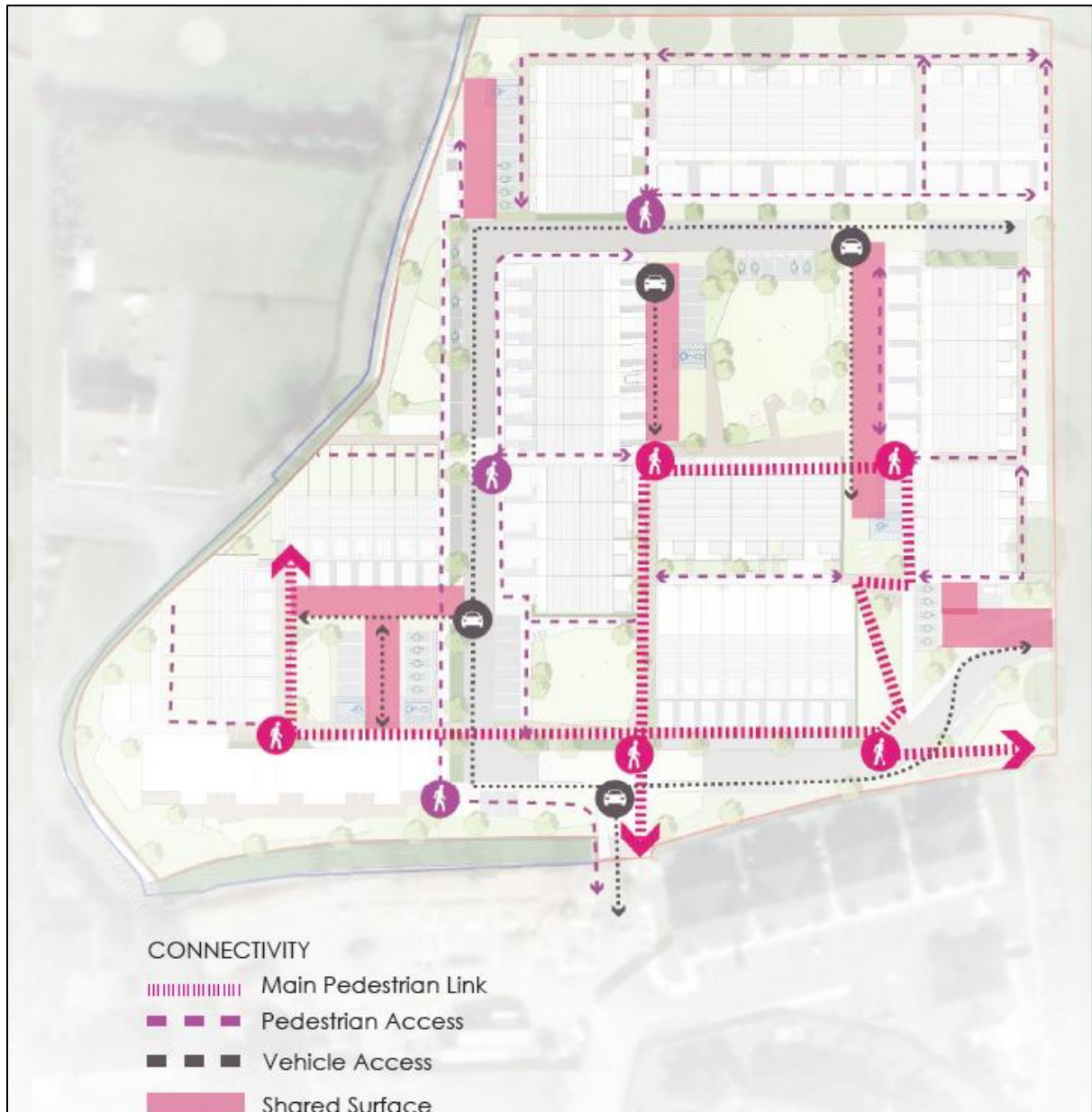


Figure 7 – Proposed Movement Strategy

Car and Vehicle Movement

- 3.8 The main vehicular entrance is accessed off the Friary Downs Road, to the south of the site, which connects further into the Killarney Town Centre via the Park Road.

3.9 The internal roadways and shared surface areas provide for appropriate segregation and integration between the individual neighbourhood areas. The layout has also considered the possibility for future road connection access through the north-eastern corner of the site into a future link road connecting to the east of the site.

3.10 Emergency vehicular access is to be provided from the main entrance of the site.

Car Parking

3.11 A total of 139 no. surface car parking spaces (including visitor, accessible and EV charging spaces) are provided for residential dwellings, with all carparking being provided at surface level. This provision includes 4 no. car-share parking spaces, 6 no. visitor spaces, and 5 no. assigned Part M/accessible spaces.

Bicycle Parking

3.12 The following bicycle parking is provided:

- 118 no. residents private spaces;
- 102 no. residents shared spaces;
- 52 no. visitor spaces

3.13 It is noted that the townhouse and duplex typologies have on curtilage open space to allow for the parking/storage of bicycles.

Open Space and Landscape Design Strategy

3.14 The site layout ensures a high-quality, legible, and attractive composition of open spaces that deliver functional and well-integrated amenity areas for residents and visitors. The arrangement of landscaped areas strengthens the identity of the scheme while ensuring the development is visually and physically connected to its surrounding environment.

3.15 The landscape design responds to site orientation and microclimatic conditions to create comfortable, habitable spaces. The inclusion of rain gardens, street trees, and amenity lawns ensures these areas are both functional and attractive. These features encourage residents to use outdoor spaces safely, with natural surveillance supported through the positioning of communal and public areas adjacent to active building frontages.

3.16 A series of pedestrian and cycle routes have been identified throughout the site to reinforce connections with the wider area. In particular, the north-south natural connection has been retained along the eastern boundary, integrating the existing hedgerow as a central 'green spine' to the layout. This is supported by a parallel walk/cycleway, promoting sustainable modes of travel and providing a key structuring element of the open space strategy.

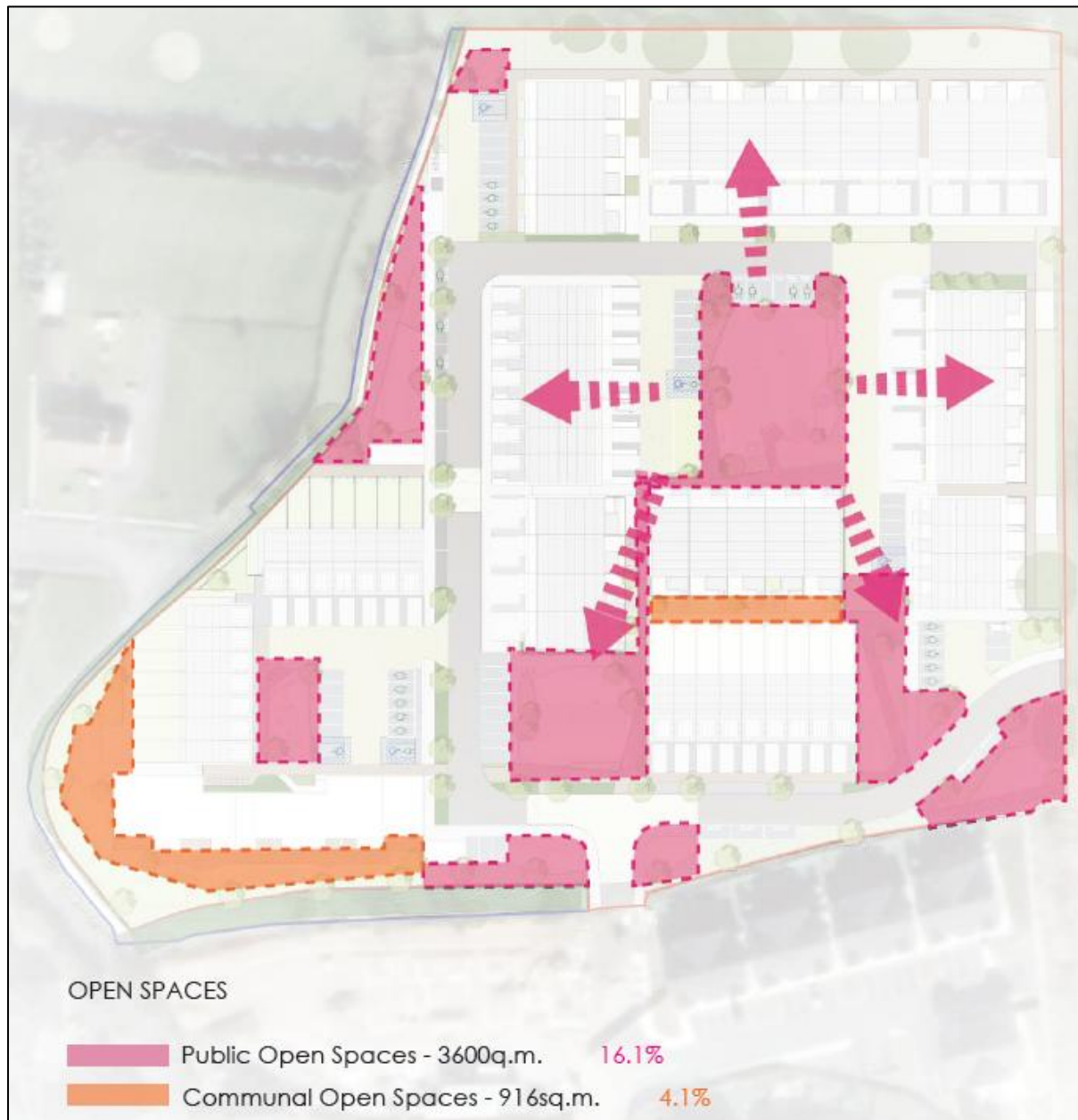


Figure 8 – Proposed Landscape Design Approach

- 3.17 The landscape proposals have been designed to respond positively to biodiversity considerations. Existing hedgerows, natural boundaries, and tree groups are retained where feasible, with further measures introduced to enhance wildlife habitats. Dedicated biodiversity zones are positioned along the site's eastern boundary, providing ecological value and supporting wider green infrastructure links.
- 3.18 A total of 3,600 sqm of Public Open Space (POS) has been allocated, equating to 16% of the residential site area. This provision is distributed across a series of distinctive character areas, each contributing to the amenity, ecological, and social function of the development. Further detail is set out in the accompanying Landscape Design Statement.

- 3.19 The distribution and design of the public open spaces have been carefully considered to achieve the following:
- Continuation of the existing natural landscape framework, strengthening the ecological and amenity value of retained features, while recognising their sensitivity to new development.
 - Creation of a central 'green-lung', structured around the north–south hedgerow and enhanced to provide a pedestrian/cycle link for residents, encouraging sustainable movement and informal recreation.
 - Provision of accessible social and play spaces, with landscaped open areas positioned at key points within the layout, including near the site entrance, to encourage gathering, play, and neighbourly interaction.
- 3.20 In addition to the public open space network, the scheme incorporates 956 sqm of outdoor communal open space, through two garden areas. These gardens include amenity lawns, ornamental planting, and biodiversity-friendly species to create sheltered, semi-private outdoor areas for relaxation, play, and neighbourly interaction.
- 3.21 Together, the public and communal spaces form a connected green infrastructure network, balancing biodiversity value with social amenity. Rain gardens contribute to sustainable drainage, wildflower meadows and pollinator species enrich biodiversity, and street tree planting enhances character and shade. This holistic strategy improves the liveability of the development, strengthens connections to the train station, and ensures long-term ecological and community benefits.

Height, Scale and Massing

- 3.22 The development's massing and building form are carefully considered to create a balanced and visually appealing scheme. The design incorporates a variety of building heights and typologies that respond to the site's context and maximise visual interest. The key elements include:
- Residential Units: A mix of 123 units consisting of terraced houses, apartments and duplexes. The height varies between two and three storeys, maintaining a human scale and reducing visual bulk.
 - Duplexes: A combination of one-bed, two-bed, and three-bed duplexes, designed to integrate seamlessly with the surrounding structures.
 - Townhouses: A total of 23 no. 3 bedroom townhouses are positioned around the site area, designed to a similar style to the Duplex Units
 - Apartments: A combination of one-bed & two-bed apartment units, located in one central apartment block ranging in height from 2 to 4 storeys.



Figure 9: CGI of Proposed Apartment Building
Source: TMG Designs

- 3.23 The massing strategy ensures the development maximises natural light, avoids overshadowing, and respects privacy, while the varied building heights create a visually dynamic streetscape and skyline.
- 3.24 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.
- 3.25 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.

Residential Component

Mix

- 3.26 The overall residential mix is:
- 27 no. 1 bed units
 - 45 no. 2 bed units
 - 51 no. 3 bed units
- 3.27 In terms of typologies, there will be:

- 16 no. 1 bed apartments
- 6 no. 2 bed apartments
- 28 no. 1 bed duplex apartments
- 28 no. 2 bed duplex maisonettes
- 11 no. 1 bed duplex maisonettes
- 11 no. 2 bed duplex apartments
- 23 no. 3 bed terrace houses



Figure 10: CGI of Proposed Residential Units and Open Space
Source: TMG Designs

- 3.28 Each typology in the proposed development has been specifically designed, selected and sited to respond to the specific characteristics of its location. The scheme has sought to strike a balance between functionality, design quality, and placemaking, while integrating natural hedgerows and natura elements around the site. This design approach ensures a high-quality residential environment that integrates seamlessly with the site's unique context.
- 3.29 The sites overall size and integration with existing the existing residential estates, require the selection of unit typologies that respond specifically to the sites attributes, in addition to the demands and requirements of the local housing market. Each typology was chosen to maximise the architectural quality, create a vibrant and inclusive residential environment and provide for essential residential units that meet the growing demands in the area.

Social and Affordable Housing

- 3.30 It is the applicant's intention to comply with a condition (subject to a grant of planning permission) requiring that a Part V agreement be entered into under section 96(2) of the Act, by way of transfer to the ownership of the planning authority of a number of housing units on the subject site, as allowed for under Section 96(3)(b)(i).
- 3.31 Under the Affordable Housing Act 2021, land that already has planning permission or was purchased between 1 September 2015 and 31 July 2021 and planning permission

is granted before 31 July 2026, is only subject to the 10% requirement for Part V housing. The applicant can confirm they purchased the subject lands between August 2017 & July 2018, thus complying with the conditions associated.

- 3.32 The proposed development contains 123 no. units. On this basis, and assuming that any planning permission granted is for 123 no. units, the applicant proposes to provide 25 no. units as social and affordable housing.
- 3.33 Refer to detailed Part V proposal under separate cover.
- 3.34 In addition to the above formal offer under Part V, the applicant has ensured that the design of the 23 no. 3 bed townhouses meets the requirements for the Affordable Housing Scheme and will be offered up under this scheme.

Services and Drainage

Refuse Storage and Collection

- 3.35 An Operational Waste Management Plan (OWMP) prepared by MHL Consulting is included with this submission and fully describes operational waste/refuse storage and collection measures. The following is noted in summary:
 - **Duplex Units** - Shared communal waste storage areas have been allocated within the development, for ease of access for each of the unit blocks. All waste storage areas have been strategically located on the ground in an external location, in close proximity to the buildings.
 - **Townhouses** - Houses will have their own individual waste storage areas allocated at the rear of their buildings where external access to the rear yard is possible. When external access to the rear of the property is unavailable, bins will be stored at the front of the unit, shielded from view of the road.
 - **Apartment Block** – A shared communal waste storage area will be provided to cater for the individual block, located for ease of access for refuse collection and usability by residents.

Storm Water

- 3.36 The proposed storm water strategy is developed of a full sustainable urban drainage (SuDS) approach, with no surface water discharge intended to the public sewer.
- 3.37 All rainfall runoff will be controlled and managed through the site by way of a combination of soakaways, bioretention areas (rain gardens), permeable paving, swales and tree pits.
- 3.38 The design has allowed for a 1 in 100 year storm event with 20% climate change factor, ensuring the long term resilience of the scheme. Water quality protection is incorporated through treatment trains, including silt traps and specialist geo-textiles, to enhance the biodiversity and amenity of the scheme through integrated landscaped SuDS features into open spaces.
- 3.39 Further details of this are outlined in the submitted Engineering Assessment & Drainage Report.

Foul Water

- 3.40 The proposed foul water drainage system will connect to the existing public sewer network to the south of the site. The design separates foul and surface water, with all stormwater managed on-site via SuDS.
- 3.41 The proposed network will be constructed in accordance with Uisce Eireann Code of Practice for Wastewater Infrastructure, with on-site network discharges to a 225mm diameter foul sewer at a 1:100 gradient, with hydraulic checks undertaken confirming the receiving sewer has sufficient capacity to accommodate the additional flows.
- 3.42 The proposed foul sewer for the development will consist of a new wastewater connection point being created that will connect to the existing foul water manhole located at the roundabout along Stoney Lane.
- 3.43 The connection to the existing foul sewer is noted by TIEC who outline in further detail in the submitted Engineering Assessment & Drainage Report.
- 3.44 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.

Water Supply

- 3.45 The water main for the proposed development will be a 150mm inside diameter PE100 pipe, reducing to a 100mm diameter branches within the development to supply individual blocks and dwellings, with a Confirmation of Feasibility provided from Uisce Éireann in March 2025 that the proposed connection is feasible without the need for infrastructure upgrades to the network.
- 3.46 The proposed watermain network will be designed in accordance with Uisce Éireann’s Code of Practice for Wastewater Infrastructure.

SUDs

- 3.47 The Sustainable Urban Drainage System approach, for the proposed development scheme, considers the complete treatment of stormwater, wholly on-site, without any off-site discharge, through natural infiltration methods.

- 3.48 Each aspect of the impermeable areas within the site has been considered in the relation to both quantity and quality of water to be treated.
- 3.49 Rainwater from roofs will soak into the ground through a series of underground soakaways, while landscaped rain gardens and bioretention areas will capture and filter water from buildings and roads. These areas are planted with trees and vegetation, helping to slow down flows, improve water quality, and add biodiversity.
- 3.50 Roads will also be served by specially designed tree pits, which take runoff directly from the street surface and allow it to soak naturally into the ground. Car parking areas will be built with permeable paving so that rain can filter through, with hidden layers beneath to trap and break down any pollutants.
- 3.51 Alongside paths and open spaces, shallow swales will guide and clean runoff, doubling as attractive landscaped features.
- 3.52 Together, these measures ensure the development is resilient to heavy rainfall and future climate change, while also enhancing the appearance and ecology of the site. The SuDS strategy not only prevents flooding but also contributes to greener, healthier surroundings for residents and the wider community.

4.0 RELEVANT PLANNING HISTORY

4.1 We note that a previous application for an almost identical development under Reg. Ref: 26/6009 was withdrawn. here 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.

4.2 The following adjacent/adjoining applications are noted as being relevant to the evolution of the surrounding area. These are set out below in chronological order (oldest to newest).

Reg. Ref: 04/204149 (housing estate to the south)

4.3 Planning permission was granted to Lakepoint Development by Kerry County Council in June 2004 for a development originally described as 49 No. dwelling houses; 40 No. apartments; access road and ancillary services, and two-storey building containing a child care facility and 2 No. apartments.

4.4 The childcare facility was not construction under this permission, and as described below, has been subject to a separate planning application.

4.5 An extension of the duration of the planning permission was subsequently granted under Reg. Ref: 04/294149.

Reg. Ref: 18/221 / An Bord Pleanála Ref: ABP-302939-18

4.6 Planning permission was granted to Wrightwood Developments Ltd by An Bord Pleanála in March 2019 for permission to retain in-situ foundations and construction of 10 no. semi-detached dwellings.

Reg. Ref: 18/222 / An Bord Pleanála Ref: ABP 302942-18

4.7 Planning permission was granted to Wrightwood Developments Ltd by An Bord Pleanála in March 2019 for the construction of 15 dwellings comprising: Block D – 9 no. terraced two storey 3 bedroom dwellings backing onto the northern boundary. Block E - 6 no. two storey semi-detached 3 bedroom dwellings. These dwellings provide an addition to those permitted under Reg. Ref: 04/204149.

4.8 A subsequent amendment application under Reg. Ref: 21/1178 granted planning permission to retain 9 no. townhouses as constructed previously granted under planning reg. no. 18222 within revised site boundaries, permission to complete the no. 9 townhouses, and permission for change of design of 6 no. of semi-detached previously granted under planning reg. no. 18222.

4.9 It is noted that, separately, permission was refused by An Bord Pleanála under ABP 302940-18 (Reg. Ref: 18/141) for permission on the site to the north-west for retention of in situ foundations, construction of 9 townhouses, and a creche with apartment above.

Reg. Ref: 20/1237 (site to south of subject site)

- 4.10 Permission granted was granted in January 2022 to Wrightwood Developments Ltd for development to (1) retain existing in situ foundations (2) permission to construct 2 no. blocks of apartments consisting of 12 no. apartments in block A and 6no. apartments in block B to be serviced with a new access road and all ancillary site works. These works are currently significantly advanced on site.

Reg. Ref: 23/991

- 4.11 Planning permission was granted to Wrightwood Developments Ltd by Kerry County Council in December 2023 for a development comprising of (a) construction of children's creche, (b) construct 14 in number 1 bedroom and 2 in number 2-bedroom apartments, (c) new access road, parking and all associated site works within revised site boundaries.

Reg. Ref: 25/60046

- 4.12 Planning permission was granted to Wrightwood Developments Ltd by Kerry County Council in March 2025 to construct a revised design Children's Creche, parking and all associated site works as previously granted under Reg. Ref: 23/991.
- 4.13 Construction has commenced on this creche and is scheduled for full completion in late Q2 2026.

5.0 PRE-APPLICATION CONSULTATION

Section 247

- 5.1 A Section 247 pre-planning meeting was held with Kerry County Council on the 22nd July 2026.

Section 32B Final Consultation Meeting

- 5.2 A Section 32B final consultation meeting was held with Kerry County Council on the 24th July 2026. A response to the written opinion issued by Kerry County Council after the Section 32B meeting is enclosed under separate cover.

6.0 RELEVANT NATIONAL AND REGIONAL PLANNING POLICY CONTEXT

6.1 The following policy documents are considered relevant to the proposed development.

National Planning Context / Strategic Policy Documents

- Project Ireland 2040 - National Planning Framework (First Revision April 2025)
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016),
- Housing for All – a New Housing Plan for Ireland (2021).
- Housing Commission Report (2024)

Section 28 Ministerial Guidelines

- Sustainable and Compact Settlements Guidelines for Planning Authorities, (2024)
- NPF Implementation: Housing Growth Requirements (July 2025)
- Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025
- Urban Development and Building Heights Guidelines for Planning Authorities (2018),
- Guidelines for Planning Authorities for Child Care Facilities (2001),
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009),
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018).

Other National Guidance Documents

- Quality Housing for Sustainable Communities - Best Practice Guidelines for Delivering Homes Sustaining Communities (2007),
- Design Manual for Urban Roads and Streets (DMURS) (2019),
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009),
- Climate Action Plan 2025
- Smarter Travel – A New Transport Policy for Ireland (2009-2020)
- National Sustainable Mobility Policy, 2022

Regional Planning Context

- Southern Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (2019),

6.2 An assessment of the relevant aspects of the national and regional planning policy is set out below.

Project Ireland 2040 - National Planning Framework (First Revision April 2025)

6.3 The Project Ireland 2040 - National Planning Framework (hereafter “NPF”) was first published in 2018 as the Government’s high-level strategic plan for shaping the future growth and development of the country to cater for a projected population increase of c. one million people to the year 2040. The NPF is accompanied by the National Development Plan, a 10-year capital investment strategy. Together they are known as Project Ireland 2040.

- 6.4 A core element of the NPF's strategy is to deliver compact growth in existing urban areas, The NPF provides a framework for future development expressed through 10 no. National Strategic Outcomes.
- 6.5 To achieve these National Strategic Outcomes each of the NPF's 10 no. chapters contain National Policy Objectives, covering a revised 108 no. National Policy Objectives in total, which promote coordinated spatial planning, sustainable use of resources and protection of the environment and the Natura 2000 network.
- 6.6 The National Planning Framework (NPF) includes as a core element the delivery of compact growth in existing urban areas, with the key features being: it includes targeting a greater proportion (40%) of future housing development to be within and close to the existing footprint of built-up areas.
- 6.7 The NPF also targets enabling significant population and jobs growth in the Dublin metropolitan area, together with better management against overspill into surrounding counties.
- 6.8 The NPF projects an additional 50,000 homes annually will be required to meet future demands by 2040, estimated therefore at around 750,000 homes in the NPF lifetime.
- 6.9 At a regional level relevant to Kerry, National Policy Objective 1b is *"Southern Region: 340,000 - 380,000 additional people i.e. a population of almost 2 million."*
- 6.10 The NPF also states that *"to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas"*.
- 6.11 Reflecting the above, National Policy Objective 9 is to *"Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints and ensure compact and sequential patterns of growth."*
- 6.12 Section 6.6 of the NPF also states one of its core principles is to: *"Allow for choice in housing location, type, tenure and accommodation in responding to need", in addition to tailoring "the scale and nature of future housing provision to the size and type of settlement where it is planned to be located"*.
- 6.13 Other relevant national policy objectives are:
- National Policy Objective 12 - *Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*
 - National Policy Objective 20 - *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth*
 - National Policy Objective 22 - *In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.*

- National Policy Objective 43 - *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*
- National Policy Objective 45 - *Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.*

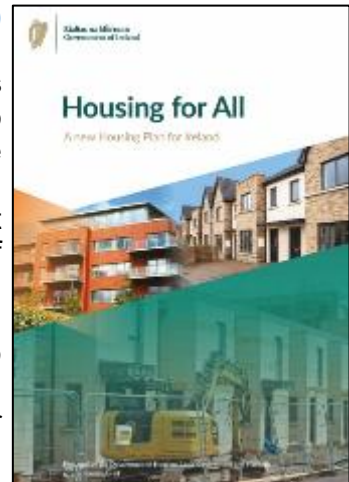
Guidelines for Planning Authorities; NPF Implementation: Housing Growth Requirements (July 2025)

- 6.14 The Section 28 Guidelines on *NPF Implementation: Housing Growth Requirements* (July 2025) set out how planning authorities must integrate revised national housing growth targets into their development plans. They replace the 2020 “Housing Supply Target Methodology” and follow the revision of the National Planning Framework (NPF) earlier in 2025.
- 6.15 The core purpose is to ensure local and regional planning reflects updated ESRI population projections and the identified need for approximately 50,000 additional homes annually to 2040, including addressing unmet demand from recent years.
- 6.16 The guidelines project structural housing demand at around 55,000 homes per year up to 2034, dropping to around 41,000 per year from 2034 to 2040. Each local authority has been allocated specific housing growth requirements for these periods (see Appendix 1), which must be embedded in their core strategies and settlement plans.
- 6.17 A strong emphasis is placed on compact growth, with at least 40% of new homes to be delivered within existing built-up footprints, and on aligning housing delivery with environmental carrying capacity and infrastructural provision.
- 6.18 To accelerate delivery, the guidelines allow planning authorities to make “additional provision” of up to 50% above baseline requirements in their development plans. This acknowledges that not all zoned land is activated during a plan period and seeks to ensure sufficient choice of sites. Authorities are required to apply a tiered approach to zoning, distinguishing between serviced land and land that can be serviced within the plan period, and to carry out Settlement Capacity Audits to identify infrastructure needs. They are also encouraged to identify “Long-Term Strategic and Sustainable Development Sites” for delivery beyond the current plan horizon.
- 6.19 Implementation is urgent: planning authorities must vary or review their development plans promptly to incorporate these requirements, ahead of the new 10-year plan cycles introduced under the Planning and Development Act 2024. Monitoring is a central feature, with regular reporting required to track progress against targets and to support environmental and NPF outcome monitoring.
- 6.20 Overall, the guidelines aim to deliver a consistent, plan-led approach to housing growth that balances national housing needs, regional equity, compact settlement patterns, and sustainable infrastructure-led development

Housing for All – a New Housing Plan for Ireland (2021)

6.21 Housing for All - a New Housing Plan for Ireland was launched in 2021 and is the Government's housing plan to the year 2030. The overall aim of the Plan is that everyone in the State has access to a home to purchase or rent at an affordable price, which is built to a high standard in the right place in support of climate action, offering a high quality of life.

6.22 The Plan is supported by additional funding and aims to work with all stakeholders, with a central element Plan being working with and enabling the private sector to deliver on housing.



6.23 The Plan estimates that Ireland needs an average of 33,000 homes constructed per annum until 2030 to meet targets set out for additional households, as outlined in the NPF. To achieve these targets the Plan is based upon four pathways as follows:

- Supporting Homeownership and Increasing Affordability
- Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion
- Increasing New Housing Supply
- Addressing Vacancy and Efficient Use of Existing Stock.

Housing Commission Report (2024)

6.24 In December 2021, the Minister for Housing, Local Government and Heritage established the Housing Commission, as committed to in the 2020 Programme for Government Our Shared Future.

6.25 The Commission was tasked with examining issues such as tenure, standards, sustainability and quality-of-life matters, considering long-term housing policy while building on the policy changes outlined in Housing for All.

6.26 The report of the Housing Commission was published in May 2024. Whilst not a planning policy document, some of the recommendations of the Report are of note, including the following:

“1. Recognise and prioritise dealing with Ireland's housing deficit and address it through emergency action.

2. Base housing policy on an assessment of the housing required for a well-functioning society. This should not be conflated with market demand or construction sector capacity.

3. Align housing provision and economic development in the National Planning Framework to ensure sufficient housing supply to meet the needs of the population in all parts of the country, including the Dublin region.

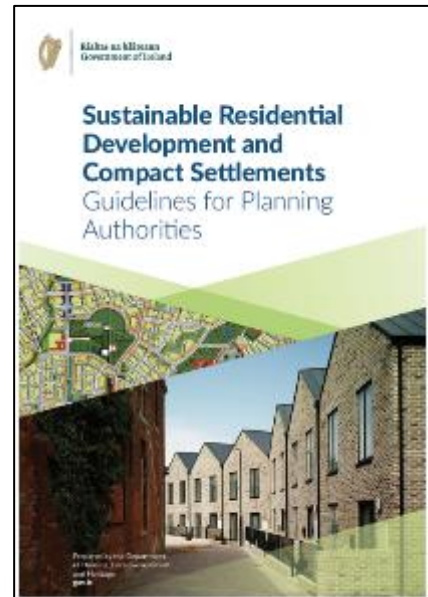
4. Account must be taken in housing policy of the full economic and social costs associated with not meeting Ireland's housing requirements.

5. Ensure that housing policy makes adequate provision for a range of housing and accommodation types to meet the specific needs of identifiable groups.”

Sustainable and Compact Settlements Guidelines for Planning Authorities, (2024)

6.27 Published in January 2024, the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities are Ministerial Guidelines under Section 28 of the Planning and Development Act 2000 (as amended), and to which Planning Authorities and An Bord Pleanála shall have regard to and shall apply any specific planning policy requirements (SPPRs) of the Guidelines, in the performance of their functions.

6.28 The Guidelines will replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published in 2009 and build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations.



6.29 Section 3.3.3 relates to Key Towns and Large Towns (+5,000 population) and states that the key priorities for the growth of Key Towns and Large Towns in order of priority are to:

*“(a) plan for an integrated and connected settlement overall, avoiding the displacement of development generated by economic drivers in the Key Town or Large Town to smaller towns and villages and rural areas in the hinterland,
(b) strengthen town centres,
(c) protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,
(d) realise opportunities for adaptation and reuse of existing buildings and for incremental backland, brownfield and infill development, and
(e) deliver sequential and sustainable urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built-up footprint of the settlement”.*

6.30 In terms of specific density guidance for Key Towns / Large Towns, the following at Section 3.3 is relevant:

“Key Town / Large Town - Centre and Urban Neighbourhood

The centre comprises the town centre and the surrounding streets, while urban neighbourhoods consist of the early phases of residential development around the centre that have evolved over time to include a greater range of land uses. It is a policy and objective of these Guidelines that residential densities in the range 40 dph-100 dph (net) shall generally be applied in the centres and urban neighbourhoods”.

- 6.31 It is considered that the application site displays some of the characteristics of a Key Town / Large Town – Centre and Urban Neighbourhood, and therefore densities in the range of 40 to 100 dph would generally apply.
- 6.32 The Guidelines state (section 3.4.1) that *“While densities within the ranges set out will be acceptable, planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area, densities closer to the mid-range at intermediate locations and densities below the mid-density range at peripheral locations”*.
- 6.33 Again, Chapter 4 of the Guidelines refers to “Quality Design and Quality Placemaking” and refers to the process of design and placemaking and of key indicators of quality design and placemaking. There are a number of SPPRs included, relating to:
- Separation distances
 - Private open space standards
 - Public Open Space
 - Public open space
 - Bicycle parking and storage
- 6.34 Although not an SPPR, Policy and Objective 5.1 relating to public open space is:

“It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.

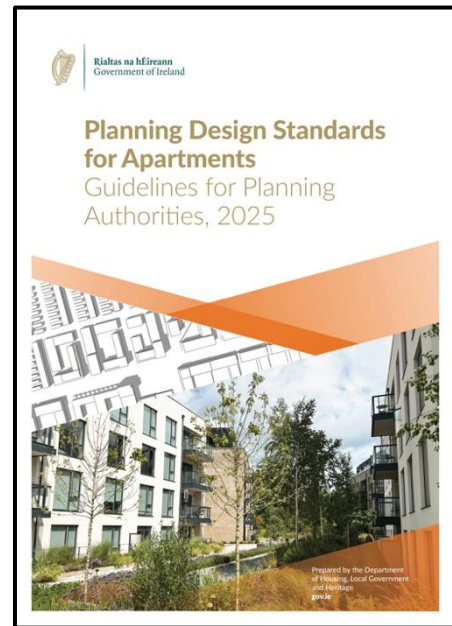
In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.

In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.

In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site”.

Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025

- 6.35 The Planning Design Standards for Apartments (2025), issued under Section 28 of the Planning and Development Act 2000 (as amended), set out updated national policy, guidance, and Specific Planning Policy Requirements (SPPRs) for the design and assessment of apartment developments.
- 6.36 Planning authorities must have regard to these guidelines and comply with all SPPRs, which take precedence over conflicting local plan policies.
- 6.37 The guidelines remove blanket housing mix requirements in most apartment developments (SPPR 1), allowing flexibility in unit sizes unless a specific mix is required for social housing, older persons' housing, or where identified through a Housing Need and Demand Assessment (HNDA).
- 6.38 Minimum internal floor areas are prescribed as follows under (SPPR 2):
- Studio (1 person): 32m²
 - 1-bedroom (2 persons): 45m²
 - 2-bedroom (3 persons): 63m²
 - 2-bedroom (4 persons): 73m²
 - 3-bedroom (4 persons): 76m²
 - 3-bedroom (5 persons): 90m²
- 6.39 At least 25% of units in a scheme must exceed the relevant minimum by 10% to promote variety and quality, with exceptions for small schemes, certain infill sites, and refurbishments.
- 6.40 Design quality and environmental performance are reinforced through daylight and ventilation standards. A minimum of 25% of apartments must be dual aspect (SPPR 3), with flexibility for small infill and refurbishment schemes. Ground floor apartments must have a minimum 2.7m floor-to-ceiling height (SPPR 4), and there is no minimum units-per-lift/stair core requirement (SPPR 5), allowing site-specific design solutions.
- 6.41 The guidelines also set clear expectations for amenity and functional spaces:
- Private amenity space: balconies, terraces, or gardens with a minimum depth of 1.5m; up to 50% of units may omit private space if high-quality communal space is provided.
 - Internal storage: minimum standards apply; some provision may be external to the unit if secure and accessible.
 - Communal amenity space: required in most schemes to support residential quality, with relaxation for certain infill/refurbishment projects.
 - Children's play: toddler play areas required for 25+ family units; older children's play areas for 100+ family units.
 - Sustainable mobility and parking are emphasised:



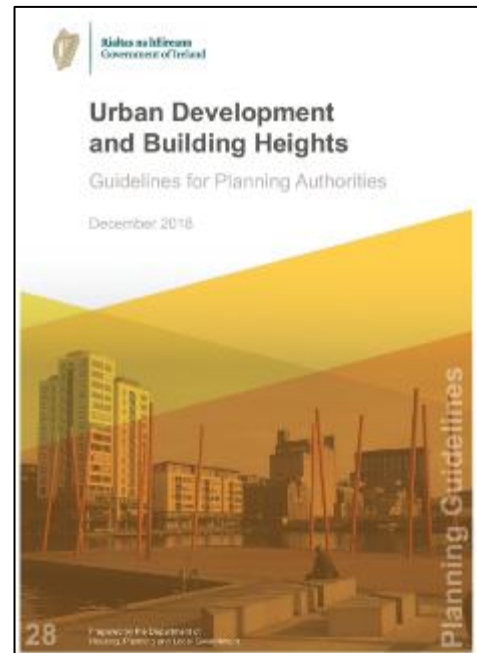
- Bicycle parking: must meet SRDCSGs SPPR 4 standards, be secure, accessible, and maintained under a management plan.
- Car parking: apply SRDCSGs maximums; minimise or remove provision in high-accessibility locations; prioritise mobility-impaired spaces and car clubs.

6.42 Communal, community, and cultural facilities are only to be required where specifically identified in the development plan (SPPR 6), preventing unnecessary viability burdens. The guidelines also contain tailored provisions for shared accommodation/co-living and purpose-built student accommodation, recognising their niche role in meeting housing needs.

Urban Development and Building Heights Guidelines for Planning Authorities (2018)

6.43 The 2018 Urban Development and Building Heights Guidelines seek to reinforce the need to consolidate and strengthen existing built-up areas, move away from blanket limitations on building height, increase densities within existing urban areas, and promote increased building height in locations with good public transport services.

6.44 The Guidelines provide that in relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in city and town cores and in other urban locations with good public transport accessibility.



6.45 The Guidelines emphasise that the achievement of the NPF Objectives and Outcomes requires increased density, scale, and heights in town and city cores. Emphasis is also placed on promoting development within the existing urban footprints and utilising existing sustainable mobility corridors and networks. The Building Height Guidelines advise that in order to implement the National Planning Framework “it *requires increased density, scale and height of development in our town and city cores, including an appropriate mix of both the living, working, social and recreational space we need in our urban areas*”.

6.46 Paragraph 1.9 of the Guidelines states that “the Government considers that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes by building up and consolidating the development of our existing urban areas”. [our emphasis].

6.47 Sections 3.4 to 3.6 of the Guidelines relate to “*Building height in suburban/edge locations (City and Town)*”. It is noted in section 3.4 that newer housing developments at the suburban edges of towns and cities, typically now include town-houses (2-3 storeys), duplexes (3-4 storeys) and apartments (4 storeys upwards), delivering medium densities in the range of 35-50 dwellings per hectare.

6.48 Section 3.7 of the goes on to state: “*such development patterns are generally appropriate outside city centres and inner suburbs, i.e. the suburban edges of towns*”.

and cities, for both infill and greenfield development and should not be subject to specific height restrictions”.

- 6.49 The Building Height Guidelines expressly seek increased building heights in urban locations:

“In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.

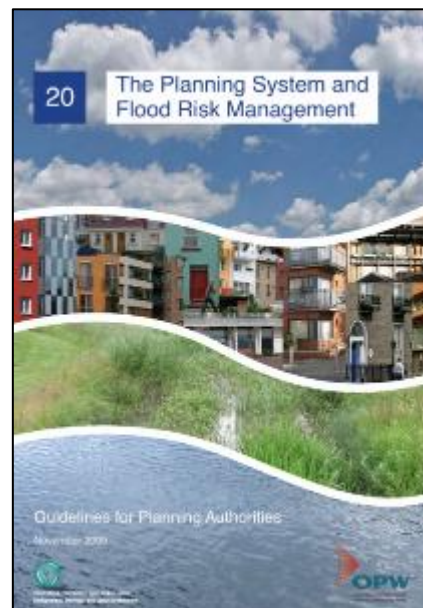
Guidelines for Planning Authorities for Child Care Facilities (2001)

- 6.50 The Childcare Facilities Guidelines for Planning Authorities (2001) (hereafter “2001 Guidelines”) refer to a benchmark provision of one new childcare facility, catering for 20 no. childcare places, for every 75 no. new dwellings developed.
- 6.51 The 2001 Guidelines also provide broader guidance on internal space standards for childcare facilities, applying a minimum floor space per child of 2.32 sq.m, exclusive of kitchen, bathroom and hall, furniture, or permanent fixtures.

The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)

- 6.52 The Planning System and Flood Risk Management – Guidelines for Planning Authorities, 2009, provide detailed guidance on the role that flood risk should play at different levels of the planning system.
- 6.53 The Guidelines introduce comprehensive mechanisms for the incorporation of flood risk identification and management into the planning process and set out the following core objectives:

- Avoid inappropriate development in areas at risk of flooding,
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off,
- Ensure effective management of residual risks for development permitted in floodplains,
- Avoid unnecessary restriction of national, regional, or local economic and social growth,
- Improve the understanding of flood risk among relevant stakeholders; and,
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.



- 6.54 Chapter 2 of the Guidelines identify types and causes of flooding, details on flood risk, the stages of flood risk assessment and flood zones, while chapter 3 sets out the principal actions when considering flood risk management, including the sequential

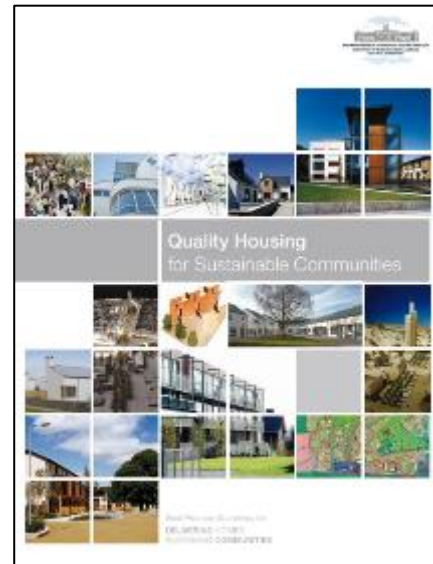
approach, justification test, and chapter 5 provides guidance on flooding and the development management process including the application of the justification test in assessing a planning application.

Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018)

- 6.55 These Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, 2018, (hereafter “the EIA Guidelines”) were issued under Section 28 of the Planning and Development Act 2000, as amended (“Act of 2000”).
- 6.56 The EIA Guidelines provide practical guidance to planning authorities and An Bord Pleanála and result in greater consistency in the methodology adopted by consent authorities. Both An Bord Pleanála and the relevant local authority are required to have regard to the EIA Guidelines in the performance of their functions under the Act of 2000.

Quality Housing for Sustainable Communities - Best Practice Guidelines for Delivering Homes Sustaining Communities (2007)

- 6.57 The Quality Housing for Sustainable Communities – Best Practice Guidelines, 2007 provide the overarching policy framework for an integrated approach to housing and planning. Sustainable neighbourhoods are areas where an efficient use of land, high quality design, and effective integration in the provision of physical and social infrastructure combine to create places people want to live in.
- 6.58 The Guidelines promote quality sustainable residential development in urban areas having regard to the following:



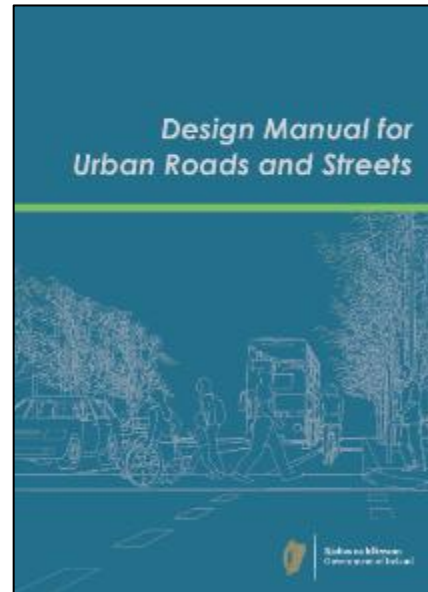
- promote high standards in the design and construction and in the provision of residential amenity and services in new housing schemes,
- encourage best use of building land and optimal of services and infrastructure in the provision of new housing,
- point the way to cost effective options for housing design that go beyond minimum codes and standards,
- promote higher standards of environmental performance and durability in housing construction,
- seek to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible, and visually attractive environment; and,
- provide homes and communities that may be easily managed and maintained.

Design Manual for Urban Roads and Streets (DMURS) (2019)

6.59 The Design Manual for Urban Roads and Streets (DMURS), first published in 2013, with an updated version released in May 2019, sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

6.60 DMURS outlines 4 no. design principles for new developments which are summarised as follows:

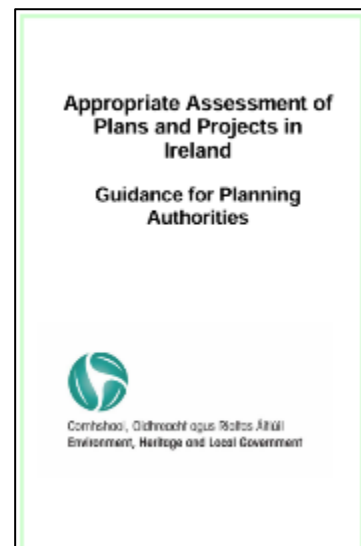
- Connected Networks: *“To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport”.*
- Multi-Functional Streets: *“The promotion of multi-functional, place-based streets that balance the needs of all users within a self-regulating environment”.*
- Pedestrian Priority: *“The quality of the street is measured by the quality of the pedestrian environment”.*
- Multi-Disciplinary Approach: *“Greater communication and cooperation between design professionals through the promotion of a plan-led, multidisciplinary approach to design.”*



Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)

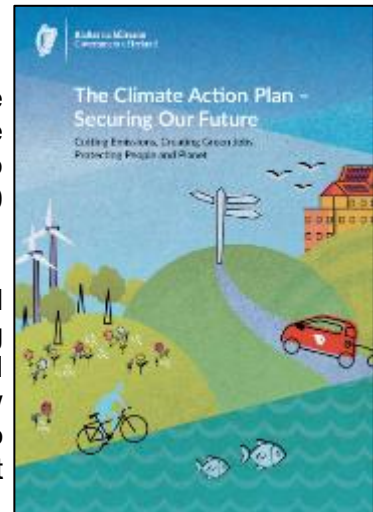
6.61 The Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, 2009, were prepared jointly by the NPWS and Planning Divisions of DECLG. The Guidelines set out the different steps and stages needed in establishing whether a plan or project can be implemented without damaging a Natura 2000 site.

6.62 The Guidelines indicate the role to be played by professional ecologists and other professionals in identifying and assessing potential impacts. The Guidelines address issues of mitigation and avoidance of impacts, and also the Article 6.4 derogation provisions in circumstances in which there are no alternatives and there are imperative reasons of overriding public interest requiring a plan or project to proceed.



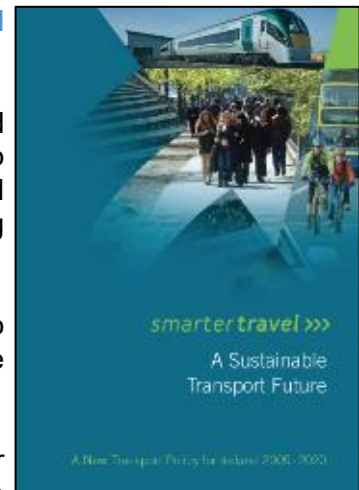
Climate Action Plan 2025

- 6.63 In April 2025, the Government approved the Climate Action Plan 2025 (CAP25), the fifth overall update to the plan and the third since Ireland committed in law to reducing its greenhouse gas emissions by 51% by 2030 (relative to 2018 levels).
- 6.64 The plan implements the carbon budgets and sectoral emissions ceilings, and sets out a roadmap for taking decisive action to halve Ireland's emissions by 2030, and reach net zero no later than 2050. CAP25 sets out how Ireland can accelerate the actions that are required to respond to the climate crisis, putting climate solutions at the centre of Ireland's social and economic development.
- 6.65 In terms of the built environment, CAP25 sets out that "The roadmap for long-term decarbonisation of the commercial built environment is currently being finalised by the Department of Enterprise, Trade and Employment. The Business Energy Upgrades Scheme, with a particular focus on SMEs, was launched in November 2024. The new scheme supports a range of measures to improve energy efficiency and decarbonisation in the commercial sector.
- 6.66 CAP25, as relevant to the built environment, is strongly focused on energy efficiency of buildings, and construction decarbonisation.



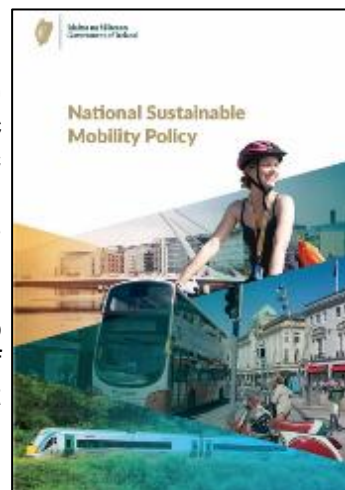
Smarter Travel – A New Transport Policy for Ireland (2009-2020)

- 6.67 The Smarter Travel – A New Transport Policy for Ireland document was published by the Government in 2009 to address, and reverse, unsustainable transport, and travel trends in the country. The document targets the following key areas:
- Encourage future growth in compact forms, to support sustainable travel and discourage dispersed development and long commutes.
 - Reduce work-related commuting by car to under 50% modal share and encourage changes in personal travel behaviour.



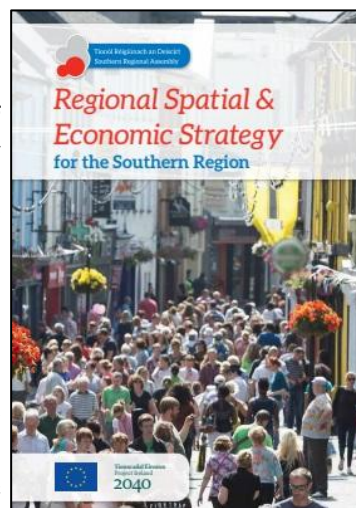
National Sustainable Mobility Policy (2022 – 2025)

- 6.68 The National Sustainable Mobility Policy (hereafter “SMP”) was published in April 2022. The SMP sets out a strategic framework to the year 2030 for active travel and public transport to support Ireland’s requirements to achieve a 51% reduction in carbon emissions by the end of this decade.
- 6.69 The SMP includes for three principles and ten goals to support behavioural change through a wide range of interventions including, inter alia: public transport infrastructure and services, active travel promotion and supports, road safety initiatives, legislative measures, research, and public engagement.



Southern Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (2019)

- 6.70 The NPF has been supported by the establishment of statutory Regional Spatial & Economic Strategies for Ireland’s three regional assemblies. The Southern Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (hereafter “RSES”) is the relevant regional strategy for the proposed development.
- 6.71 Killarney is set out as a Key Town within the RSES, which states its importance as a settlement in balancing protection of an exceptional natural environment, ecology and heritage with inherent strengths and specialist role in tourism, culture, amenity and other dynamic economic activities.
- 6.72 The Regional Policy Objectives that are of relevance to Killarney are as follows:



- **RPO 18a:** To sustainably strengthen the role of Killarney as a strategically located urban centre of significant influence in a sub-regional context, a centre of excellence in tourism, recreation and amenity sectors, to promote its role as a leader in these sectors, in particular training and education, and strengthen its overall multi-sectoral dynamic as a key settlement in the Kerry Hub Knowledge Triangle accessible to regional airport, port, rail and road assets.
- **RPO 18b:** To seek investment to sustainably support its compact growth and regeneration, attributes and infrastructure, including key inter-regional connectivity (transport networks and digital) on the strategic road network between Cork and Limerick Shannon Metropolitan Areas, the Atlantic Economic Corridor and the Kerry Hub Knowledge Triangle, subject to the outcome of the planning process and environmental assessments;
- **RPO 18g:** Future growth of the town should be planned for on a phased basis in consultation with the local authority and Irish Water to ensure that sufficient wastewater capacity is accounted for, and that further growth avoids negative impacts on the downstream freshwater ecosystem in the National Park (River Deenagh, Lough Leane)

7.0 RELEVANT LOCAL PLANNING POLICY CONTEXT

- 7.1 The subject site is located within the administrative boundary of Kerry County Council and is therefore covered by the existing Kerry County Council Development Plan, 2022-2028 (hereafter “CDP”).
- 7.2 We outline below the key provisions of the CDP & Settlement Plan as they relate to the proposed development. A full assessment of all relevant policies and objectives in the County Development Plan, will be submitted in the final application submission.

Land Use Zoning

Kerry County Development Plan 2022 - 2028

- 7.3 Under the existing CDP, the subject site is zoned Objective R1 ‘New/proposed Residential Phase 1’ to ‘Provide for new residential development in tandem with the provision of the necessary social and physical infrastructure’.
- 7.4 As can be identified in the zoning map below, the subject site is outlined in red below.

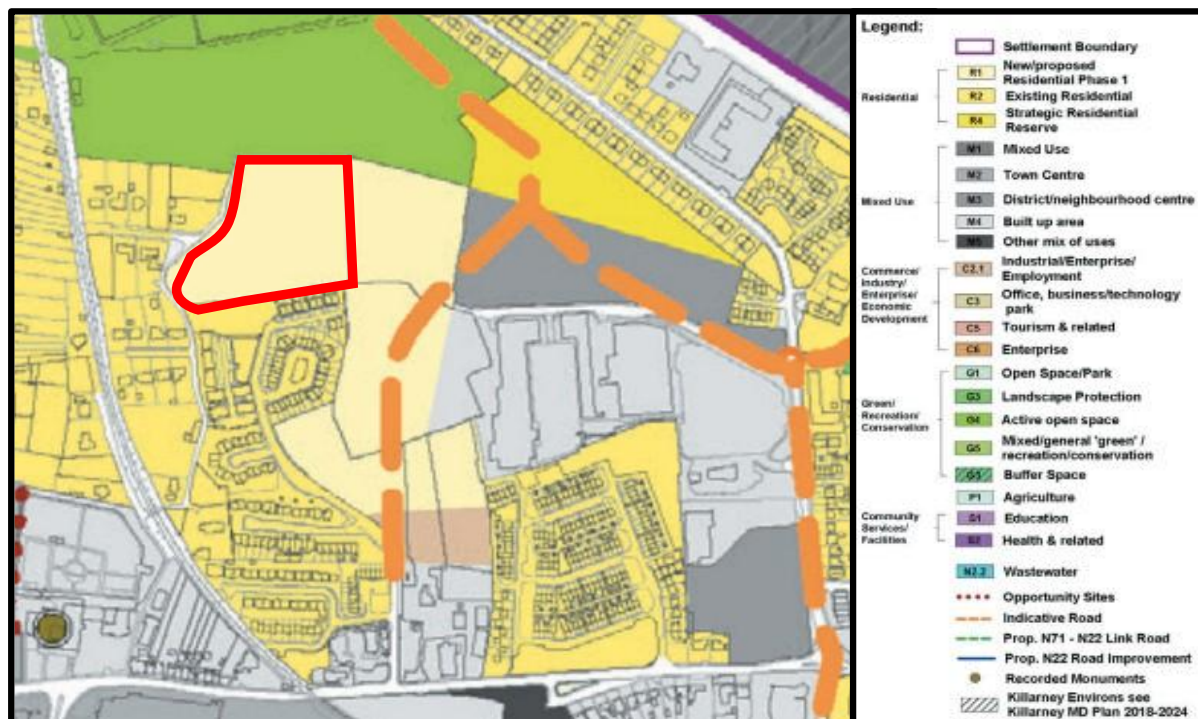


Figure 11 – Subject Site outlined in Red within Zoning Map (No. 8) of the Kerry County Development Plan 2022 - 2028

Settlement Strategy & Core Strategy

- 7.5 Killarney is identified as a ‘Key Town’ in the Settlement Hierarchy set out in Section 3.10.2 of the Development Plan.

7.6 The Core Strategy set out within the Development Plan envisages a population growth in Killarney of 1,630 persons over the lifetime of the plan. This population growth equates to a requirement for 1,277 residential units.

7.7 The following objectives are of note:

- KCDP 3-1 – *“Promote the Sustainable Development of the County in line with the Strategic Core Principles of the Core Strategy”.*
- KCDP 3-2 – *“Support the sustainable growth and prioritise development of the county’s settlements in accordance with the Settlement Hierarchy and the Core Strategy”.*

7.8 The proposed development is located on a site zoned for residential development and in a sustainable location in Killarney, adjacent to existing built residential development and a short distance from public transport.

Housing

7.9 The following housing objectives are noted as relevant:

- KCDP 4-31 – *“Promote the development of vacant residential and regeneration sites in all development centres in the County, as appropriate, in accordance with the provisions of Housing for All – A New Housing Plan for Ireland”.*
- KCDP 6-15 – *“Facilitate the provision of suitable housing for people with specific needs in their local communities through actively providing / assisting the provision of housing in settlements”.*
- KCDP 6-16 – *“Have regard to and promote increased residential densities in the towns and other appropriate locations in accordance with the ‘Sustainable Residential Development in Urban Areas’ Guidelines 2009 (DoEHLG)”.*
- KCDP 6-17 – *“Promote integration of social housing and ensure a housing mix within developments in order to promote a socially balanced and inclusive society”.*
- KCDP 7-2 – *“Implement the policies contained in Housing for All to increase Social Housing delivery in the County”.*
- KCDP 7-18 – *“Facilitate the development of housing for older people in accordance with Housing for All across Kerry’s towns and villages as well as rural areas which is appropriate in order to improve the quality of living for our ageing population. Any new residential development should be fully aligned to the targets of national policy as enumerated under Housing Options for Our Ageing Population: Policy Statement or any subsequent guidance or national policy issued by the Department for Housing, Local Government and Heritage”.*
- KCDP 6-21 – *“Identify and promote best practice with regard to universal design of the built and external environment in line with “Building for Everyone – A Universal Design Approach” and to increase the likelihood that people will be able to remain in their own homes longer and function better as they face aging-related disabilities”.*

- 7.10 The proposed development seeks to deliver residential development in a sustainable location, at an appropriate density of 56 dwellings per hectare, and providing a range and mix of typologies including social/affordable housing.
- 7.11 In particular, and with reference to KCDP 6-15 and KCDP 7-18, age friendly/step-down housing is included in the proposal.

Sustainable Travel

- 7.12 The following sustainable travel objectives are noted as relevant:
- KCDP 6-20 – *“Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages”.*
 - KCDP 14-1 – *“Deliver sustainable transport infrastructure investments as identified for the road network, public/rural transport, and walking/cycling infrastructure to facilitate and realise the 10- minute town concept”.*
 - KCDP 14-15 – *“Promote the sustainable development of the public footpath network, the walking and cycling routes and associated infrastructure in the County, including where possible the retrofitting of cycle and pedestrian routes into the existing urban road network and in the design of new roads”.*
 - KCDP 4-15 – *“Promote the guidance principles set out in the ‘Urban Design Manual – A Best Practice Guide’ (2009), and in the ‘Design Manual for Urban Roads and Streets’ (2019) and promote a more pedestrian friendly environment through the provision of traffic calming measures and improved pedestrian infrastructure”.*
- 7.13 The proposed development includes a quantum of car parking considered to be both appropriate to the area and appropriate to encourage other sustainable travel modes.
- 7.14 The subject site is located in close proximity to Killarney town centre, the train station and bus station and as such pedestrian and cycle modes of transport will be feasible. The internal layout of the proposed development provides appropriate linkages and desire lines to encourage pedestrian and cyclist movement.

Childcare Facilities

- 7.15 Objective KCDP 6-52 seeks to *“Facilitate the provision of childcare facilities and new and refurbished schools on well- located sites within or close to existing built up areas, that meet the diverse needs of local populations”.*
- 7.16 The proposed development does not include a childcare facility. However, a creche facility was permitted on an adjacent site under Reg. Ref: 23/991 and a amendment and update, including increase in size to the creche was granted in March 2025 under Reg. Ref: 2560046. There is a surplus of childcare facilities in the permitted creche to serve the proposed development.
- 7.17 It is assessed in further detail in the accompanying Social Infrastructure Audit Report prepared for this application.

Public Open Space, Biodiversity & Play Areas

- 7.18 In terms of public open space, biodiversity and play areas, the following objectives are noted:
- KCDP 6-33 – *“Implement the recommendations of ‘Developing Play in Kerry’ Policy’, in a sustainable manner, in conjunction with all relevant agencies”.*
 - KCDP 2-5 – *“Support the development of sustainable communities that enhance the health and wellbeing of our people and places giving priority to local biodiversity and integrated nature-based solutions”.*
 - KCDP 11-19 – *“Support actions from the All-Ireland Pollinator Plan including the plan’s recommendations for grassland management and pollinator friendly species”.*
 - KCDP 11-20 – *“Support the management of appropriate green areas to become natural biodiversity areas to encourage natural wildflowers to recolonise and support enhanced bee and insect populations”.*
 - KCDP 11-28 – *“Encourage the provision of locally provenanced native tree species including those recommended by the All-Ireland Pollinator Plan as part of development landscaping schemes”.*
- 7.19 The proposed development includes extensive public open space, in a number of locations, which results in circa 16% of the site area being dedicated to public open space. The public open space will be subject to a high-quality landscape scheme to address the policies set out above, and providing a variety of passive and recreational uses. The proposed development also delivers communal open space to a high standard of design and appropriately segregated from private and public open space.

Sustainability

- 7.20 Objective KCDP 6-6 seeks to *“Require new buildings to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD)”.*
- 7.21 A Climate Action and Energy (Part L) Analysis Report has been submitted with the application, with the dwelling proposed to be targeted for an A2 BER rating.

Archaeology

- 7.22 Objective KCDP 8-24 (ii) seeks to *“Ensure that proposed development (due to location, size, or nature) which may have implications for the archaeological heritage of the county will be subject to an Archaeological Assessment (including Underwater Archaeological Impact Assessment) which may lead to further subsequent archaeological mitigation – buffer zones/exclusion zones, monitoring, pre-development archaeological testing, archaeological excavation and/or refusal of planning permission. This includes areas close to archaeological monuments, development sites which are extensive in area (half hectare or more) or length (1km or more) or include potential impacts on underwater cultural heritage and development that requires an Environmental Impact Assessment”.*

7.23 Objective KCDP 8-25 seeks to *“Ensure the protection and preservation of archaeological monuments, wrecks and features, not yet listed in the Record of Monuments & Places (RMP), Sites & Monuments Record (SMR) or Wreck Inventory of Ireland Database and such unrecorded, through ongoing review of the archaeological potential of the plan area”*.

7.24 An Archaeological Test Trenching and Impact Assessment Report, including appropriate on-site investigations, has been prepared and included within this planning application.

External Lighting

7.25 Objective KCDP 11-42 is to *“Require proposals for development that include the provision of external lighting, to clearly demonstrate that the lighting scheme is the minimum needed for security and working purposes and also to ensure that external lighting and lighting schemes are designed”*.

7.26 A public lighting report and drawings has been submitted with the planning application, with regard being had to the above policy.

Drainage

7.27 KCDP 13-24 is to *“Support the incorporation of Sustainable Urban Drainage Systems (SUDs) in all public and private development in urban areas”*.

7.28 The proposed development will include SUDs measures, which are described in more detail at Section 4.0. The Sustainable Urban Drainage System approach, for the proposed development scheme, considers the complete treatment of stormwater, wholly on-site, without any off-site discharge, through natural infiltration methods.

7.29 The design, by segregating and treating stormwater using various SUDs components, provides for a natural, cost effective, and relevantly low-maintenance solution to the on-site treatment of stormwater.

Development Management Standards

Density

7.30 Paragraph 1.5.2 relates to density and states that in assessing the density for a residential development the Planning Authority will consider the following:

- *Proximity to neighbouring and district centres*
- *Proximity to public transport bus stops*
- *The extent to which the design and layout follows a coherent design brief resulting in a high-quality residential environment.*
- *Compliance with qualitative and quantitative criteria.*
- *The extent to which the site may, due to its size, scale and location, propose its own density and character, having regard to the need to protect the established character and amenities of existing adjoining residential areas.*
- *Existing topographical landscape or other features on the site.*
- *The capacity of the infrastructure, including social and community facilities, to absorb the demands created by the development.*

- 7.31 The proposed development seeks to deliver residential development in a sustainable location, at an appropriate density of 56 dwellings per hectare, and providing a range and mix of typologies including social/affordable housing. In particular, and with reference to KCDP 6-15 and KCDP 7-18, age friendly/step-down housing is included in the proposal.
- 7.32 The density is also achieved whilst complying with all relevant site development criteria in terms of public, communal and private open space, car and bicycle parking, and other relevant criteria.
- 7.33 Existing natural features in the form of mature trees and hedgerows are retained where feasible within the layout, and the proposed development proposes a series of individual character areas set within a high-quality landscaped environment. In short, the proposed development comprises an appropriate medium density development near Killarney town centre and public transport.

Public Open Space

- 7.34 Paragraph 1.5.4.4 relates to public open space and states that “*public open space should be provided at a minimum rate of 15% of the total site area*”.
- 7.35 The proposed development provides for public open space exceeding the minimum requirement, covering 16.3% of the gross site area.

Private Open Space

- 7.36 Paragraph 1.5.4.6 relates to private open space and sets out the following minimum areas:

No. of bedrooms	Minimum Private Open Space
1 - 2 bedroom*	50 sqm
3 bedroom	60 sqm
4 bedroom (or more)	75 sqm
*Reduced quantum may be considered in respect of housing for older people/ sheltered housing etc.	

Table 1: Minimum Private Open Space Requirements for Dwelling Units

- 7.37 The private open space required is fully complied with in the proposed development. We refer to the enclosed Housing Quality Assessment.

Site Coverage

- 7.38 Paragraph 1.5.4.8 relates to maximum site coverage and states that “*A maximum 85%, or up to the existing site coverage (brownfield sites) will be allowed for urban areas, and 65% site coverage other areas in rural areas (one-off housing)*”.
- 7.39 The proposed site coverage for the proposed development is 25.9% (circa 5,786 sq.m ground floor-built footprint on a site of 22,388 sq.m).

Car Parking Standards

- 7.40 Paragraph 1.20.7 relates to car parking standards and provides the following table:

Land Use	Units	Parking Space (maximum)			Bike space
		Area 1	Area 2	Area 3	
Dwelling House					
Town/village	1 Dwelling	0	1	2	1
Housing Estate	1 Dwelling	0	0	2	1
	+ visitor space/per dwelling	0	0	0.5	0
Apartment	Per bedroom	0	1	1	1

7.41 Paragraph 1.20.8 (Accessible Car Parking) sets out a requirement for 3 per 100 spaces.

7.42 A total of 133 no. surface car parking spaces, including 4 no. car-share parking spaces, 6 no. visitor spaces, and 5 no. assigned Part M/accessible spaces.

Killarney Town Development Plan 2009 – 2015 (varied and extended)

7.43 The Killarney Town Development Plans 2009-2015 (as extended and varied) has been incorporated into the County Development Plan 2022-2028 and is contained in Volume 2 of the Development Plan. The key provisions are outlined below.

Residential Development

7.44 The following objectives are noted:

- KA 13 is to *“Facilitate the development of 1,277 residential units within the town boundary”*.
- KA 15 is to *“Facilitate the provision of a range of housing solutions, to cater for the diverse housing demand within the town, catering for individuals and families at appropriate scales and attractive alternatives to urban generated housing in rural areas”*.

7.45 It is noted that the projections in KA13 above have been superseded by the Core Strategy figures in the County Development Plan. Nonetheless, the proposed development will make an important contribution to meeting the housing targets for Killarney.

Ecology

7.46 The following objectives are noted:

- KA 21 is to *“Ensure developments in the plan area, particularly within brownfield sites, are informed by Lesser Horseshoe Bat surveys and impact assessments where appropriate, undertaken by a suitably qualified individual”*.
- KA 22 is to *“Ensure that there is no significant increase in artificial light intensity adjacent to Lesser Horseshoe Bat roosts named in the Conservation Objective Report for the Killarney National Park, Macgillycuddy’s Reeks and Caragh River Catchment SAC (Oct 2017) or along commuting routes within 2.5km of those roosts”*.

- KA 28 is to *“Seek to achieve a sustainable pattern of development which will facilitate the conservation of natural resources and habitats and minimise pollution. SuDS and other nature-based solutions will be encouraged for the protection of water quality”*.

7.47 As part of this application, Malone O'Regan Environmental Consultants have been appointed and have carried out their baseline surveys on site. As will be outlined in their individual reports and summarised in Section 8 below, there have been no concerns raised to date.

Open Space

7.48 The following objectives are noted:

- KA 68 is to *“Ensure that usable and high-quality open space is provided to enhance the character of residential areas”*.

7.49 The proposed development includes extensive public open space, in a number of locations, which results in circa 16.3% of the site area being dedicated to public open space. The public open space will be subject to a high-quality landscape scheme to address the policies set out above, and providing a variety of passive and recreational uses. The proposed development also delivers communal open space to a high standard of design and appropriately segregated from private and public open space.

Sustainable Travel

7.50 The following objectives are noted:

- KA 76 is to *“Develop and promote a more cycle and pedestrian friendly network and ancillary infrastructure throughout Killarney, having regard to environmental designations in the area”*.

7.51 The proposed development includes a quantum of car parking considered to be both appropriate to the area and appropriate to encourage other sustainable travel modes.

7.52 The subject site is located in close proximity to Killarney town centre, the train station and bus station and as such pedestrian and cycle modes of transport will be feasible. The internal layout of the proposed development provides appropriate linkages and desire lines to encourage pedestrian and cyclist movement.

Killarney Municipal District Local Area Plan 2018 – 2024

Zoning

7.53 The site is zoned R1 – New/Proposed Residential Phase 1 in the LAP.

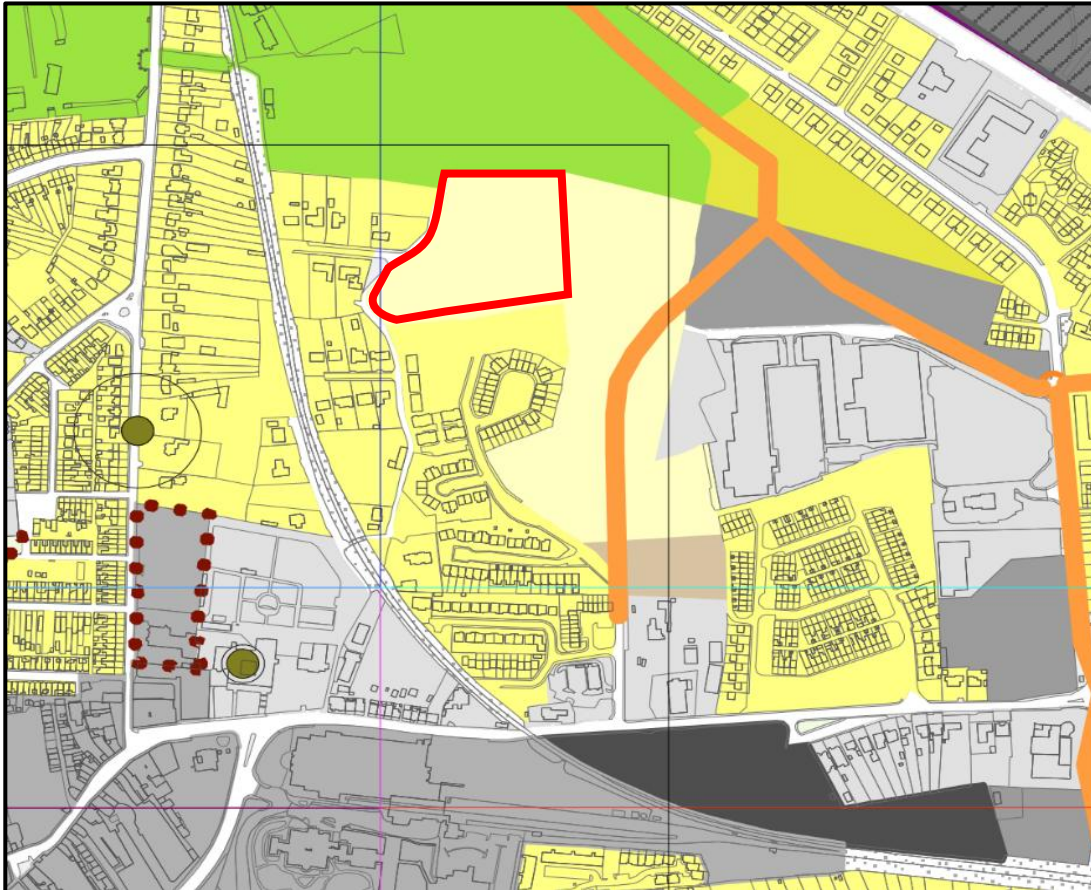


Figure 12: Zoning Map of LAP

Location of New Development

- 7.54 It is noted that KY-OO-06 seeks to *“Ensure that all new development is located within the settlements’ development boundary”*.
- 7.55 The site is within the settlement boundary and is zoned for residential development.

Residential Development

- 7.56 Policy KY RES-05 is to *“require all new residential development schemes (over 5 units) to provide for a mix of house types in order to meet and adapt to the changing demographic trends and household profiles in the County”*.
- 7.57 Policy RES-07 is to *“ensure that residential densities reflect the density of appropriate adjoining developments. Higher densities will be considered in town/village centre or within close proximity to the town/village centre. Lower densities will be considered at the edge of the settlement as per the Department of Environment, Heritage and Local Government publication, guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009”*.
- 7.58 The proposed development seeks to deliver residential development in a sustainable location, in line with the more relevant Sustainable Compact Settlement Guidelines at an appropriate density of 56 dwellings per hectare, and providing a range and mix of typologies including for social/affordable housing.

Sustainable Travel

- 7.59 Policy KY-RI-04 is to *“promote a more cycle friendly environment through the provision of improved cycling infrastructure. Development in urban areas shall have regard to the ‘National Cycling Manual (National Transport Authority), June 2011”.*
- 7.60 Policy KY-BE-04 is to *“promote a more pedestrian friendly environment through the provision of traffic calming measures and improved pedestrian infrastructure. Developments in urban areas shall have regard to the ‘Design Manual for Urban Roads and Streets’ (March 2013) – Department of Transport, Tourism, and Sport and the Department of the Environment, Community and Local Government”.*
- 7.61 As stated previously in relation to similar policies in the County Development Plan, the proposed development includes a quantum of car parking considered to be both appropriate to the area and appropriate to encourage other sustainable travel modes.
- 7.62 The subject site is located in close proximity to Killarney town centre, the train station and bus station and as such pedestrian and cycle modes of transport will be feasible.
- 7.63 The internal layout of the proposed development provides appropriate linkages and desire lines to encourage pedestrian and cyclist movement.

Biodiversity

- 7.64 Policy KY-NE-01 is to *“protect and where appropriate enhance the provision of biodiversity features in the settlements of the Killarney Municipal District area”.*
- 7.65 The proposed development includes extensive public open space, in a number of locations, which results in circa 16.3% of the site area being dedicated to public open space. The public open space will be subject to a high-quality landscape scheme to address the policies set out above, and providing a variety of passive and recreational uses and incorporating appropriate biodiversity features.
- 7.66 The proposed development also delivers communal open space to a high standard of design and appropriately segregated from private and public open space.

8.0 ASSESSMENT OF PROPOSED DEVELOPMENT IN PLANNING TERMS

Introduction

- 8.1 The key planning issues relating to the proposed development are set out below and assessed under the following headings.
- (i) Principle of Development
 - (ii) Site Layout & Design
 - (iii) Density
 - (iv) Open Space, Legibility and Green Infrastructure
 - (v) Form, Massing and Building Height
 - (vi) Traffic, Access and Parking
 - (vii) Ecological and Environmental
- 8.2 These issues have been identified and informed by the preceding review of the planning policy context, consideration of the site location and characteristics, and pre-application engagement with the planning authority.
- 8.3 The proposed development has evolved from inception through an iterative design process with a multi-disciplinary team and strongly influenced and informed by the relevant policy context. The development proposal is therefore 'plan-led' and is considered, as will be demonstrated below, to be both fully responsive to the site context and characteristics, and to the policy context.
- 8.4 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.
- 8.5 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.
- 8.6 As a preface to the below content, it is also critical to highlight that the scheme has developed with the locational and environmental sensitivity of the site fully in mind.
- 8.7 Significant environmental and ecological surveys have been carried out, as referred to in accompanying documentation with this application, and the type and scale of development proposal has been carefully guided by considerations relating to visual impact.
- 8.8 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, housing delivery and tourism accommodation, whilst also ensuring that there is no significant negative ecological or environmental impact.

(i) Principle of Development

- 8.9 The subject site is currently vacant and zoned for residential development in the current Development Plan and, therefore, provides an excellent opportunity for an appropriate and well considered residential scheme in a sustainable location close to Killarney town centre.
- 8.10 The site is zoned Objective R1 'New/proposed Residential Phase 1' to '*Provide for new residential development in tandem with the provision of the necessary social and physical infrastructure*'.
- 8.11 The development of this site will help to consolidate the suburban form of Killarney, infilling an underutilised parcel of land on the northeastern part of the town. Being located within the settlements' development boundary, the proposals are in line with the Objective KY-OO-06 of the Killarney Municipal District LAP.
- 8.12 The Core Strategy set out within the Development Plan envisages a population growth in Killarney of 1,630 persons over the lifetime of the plan. This population growth equates to a requirement for 1,277 residential units. The proposed development will make an important contribution to meeting these targets.
- 8.13 Having regard to all of the above, it is submitted that the proposed development is acceptable in principle having regard to the zoning, settlement strategy and core strategy in the County Development Plan.

(ii) Site Layout & Design

- 8.14 The proposed development's approach to the site layout and design is centred on creating a high-quality, medium density residential development that is responsive to the existing residential area that is located around it.
- 8.15 The urban form and layout have been heavily influenced by the existing site characteristics, including the gentle topography and existing boundary treatments that segregate from the existing residential dwellings to the south and west.
- 8.16 The layout provides a number of compact neighbourhood areas, which feed off a main access road through the site, creating a legible urban structure with a clear street hierarchy and offers both active frontage and passive surveillance across the proposed public and communal areas.
- 8.17 As part of the application, a Design Statement has been prepared by R. Graham O'Sullivan Architects which sets out the key details of the design & layout development approach, having regard to the policies and objectives set out under the Development Plan. The key design principles include:
- Provision of a new low-rise, medium density housing model,
 - The provision of public spaces within the neighbourhood core and along the outer, peripheral edges,
 - An architectural style and design that provides the highest quality dwelling types and sizes
- 8.18 The submitted application provides for an integrated and well-designed urban design approach that has incorporated a mix of typology types and building designs, providing

for a diverse range of units that complemented by a number of well distributed and designed landscaped open spaces within each of the neighbourhood areas.

- 8.19 It is considered that the proposed site layout has provided for a well-structured, accessed & landscaped layout that will benefit those that are residents or those visiting the neighbourhood.

(iii) Density

- 8.20 The proposed development achieves a net density of 55 units per hectare. This density has been generally targeted rather than a result of the iterative design process. The target of in the range of 40 - 100 units per hectare has been informed by the guidance set out in the Sustainable and Compact Settlements Guidelines for Planning Authorities (2024).

- 8.21 The density is calculated in accordance with Appendix B of the aforementioned Guidelines, which sets out the following process for a mixed use development in terms of density calculation:

- Calculate Net Site Area
- Calculate the overall GFA
- Differentiate between the % of residential and non-residential GFA
- Reduce net site area by the percentage of non-residential GFA
- Divide number of dwellings by reduced site area.

- 8.22 Following these steps for the proposed development:

- Calculate Net Site Area – 2.23 hectares
- Calculate the overall GFA – 12,035 sq.m
- Differentiate between the % of residential and non-residential GFA – 0sqm non-residential (100%)
- Reduce net site area by the percentage of non-residential GFA – 2.23 ha divided by 100% = 2.23 hectares
- Divide number of dwellings by reduced site area.- 123 / 2.23 ha = 55 units per hectare

- 8.23 Table 3.5 of the Guidelines sets out densities for Key Towns and Large Towns (5,000+population)

- 8.24 Killarney can be considered a Key Town as it exceeds the population of 5,000 + persons living in it, with the town having a population of 14,412 in the 2022 Census figures.

- 8.25 The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) provide the following relevant density guidance:

“Key Town / Large Town - Centre and Urban Neighbourhood

The centre comprises the town centre and the surrounding streets, while urban neighbourhoods consist of the early phases of residential development around the centre that have evolved over time to include a greater range of land uses. It is a policy and objective of these Guidelines that residential densities in the range 40 dph-100 dph (net) shall generally be applied in the centres and urban neighbourhoods”.

- 8.26 The subject site in Killarney is considered to fit appropriately into the category of an urban neighbourhood within the town area, as the site is within an existing built-up area and is presently zoned for new residential development to take place on it.
- 8.27 Having regard to the above, the applicable density range for the site is considered to be 40 – 100 dph.
- 8.28 The Guidelines state (section 3.4.1) that *“While densities within the ranges set out will be acceptable, planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area, densities closer to the mid-range at intermediate locations and densities below the mid-density range at peripheral locations”*.
- 8.29 There are a number of factors therefore which have driven the 55 dph density, specifically:
- The visual prevalence of the subject site from many vantage points which has dictated a requirement for a generally lower (2 to 4 storeys) height profile.
 - Access to public transport is within both walking and cycling distance, it does not however operate at a frequency that would warrant higher density approaches being proposed.
 - The importance of recognising the existing site conditions and environmental considerations, which influence the level of development able to be included within the subject site.
- 8.30 Having regard to the above, the exercise of ‘refining density’ as set out in the Guidelines, the appropriate density on the site is considered to be towards the lower - mid range as set out in Table 3.3 of the Guidelines.

(iv) Open Space, Legibility and Green Infrastructure

- 8.31 The key policy requirements for open space are as follows:
- Under the KCC Development Plan 2022-2028 Objectives KCDP 11-19 and KCDP 11-28 specifically reference need to support the actions of the All-Ireland Pollinator Plan, in addition to KCDP 11-20 stating the following *“Support the management of appropriate green areas to become natural biodiversity areas to encourage natural wildflowers to recolonise and support enhanced bee and insect populations”*.
 - Policy and Objective 5.1 of the Sustainable and Compact Settlements Guidelines for Planning Authorities (2024) relating to public open space requires a minimum of 10% open space for the residential site.
 - Private and communal open space standards for duplex/apartments are set out in SPPR 2 of the Sustainable and Compact Settlements Guidelines for Planning Authorities (2024).
- 8.32 In terms of quantitative compliance with the standards:

- The Housing Quality Assessment submitted with the application demonstrates full compliance with private and communal / semi-private open space requirements.
- For public open space, the proposal includes 3,600 sqm of Public Open Space (POS), equating to 16% of the residential site area, and well exceeding the minimum 10% requirement. It is noted that the KCC Development Plan 2022-2028 refers to 15% public open space “normally” being required for R1 zoned lands.
- For communal open space, the proposal includes 956 sqm of Communal Open Space (COS), exceeding the minimum requirement of 841 sqm. This is outdoor space.

- 8.33 Aside from complying with quantitative standards as set out above, the open space strategy for the proposed development is much more than simply box ticking in terms of numbers. The open space delivers a number of strategic linkages and routes, as well as providing spaces that are influenced through environmental and ecological surroundings.
- 8.34 A number of routes around the site have been identified to benefit connections with its surroundings and provide a better amenity for the wider community. Pedestrian and cycle routes complement this strategy underpinning the sustainable credentials associated with the development.
- 8.35 In addition to the public open spaces & pocket parks, the site also features 956 sqm of communal open space in the form of carefully designed spaces that integrate with the proposed duplex units and apartment block to the south. These communal open space gardens will offer residents additional outdoor amenities for relaxation, socialising, and recreation.
- 8.36 Overall, the landscaping proposal aligns with the best practice design principles and local development plan objectives, by enhancing the character of the area, promoting sustainability and improving the residential quality of the development.

(v) Form, Massing and Building Height

- 8.37 The development’s massing and building form are carefully considered to create a balanced and visually appealing scheme. The design incorporates a variety of typologies that respond to the site’s context and maximise visual interest. The key elements include:
- Combination of two and three storey terraces of different design.
 - Apartment block of two to four storeys.
 - Simple linear volumes enclosing a variety of external public spaces.
 - Forms and durable materials consistent with the local vernacular
 - Terraces and balconies offering variety and detail to the forms
- 8.38 The site configuration, building heights and separation distances are compliant with the requirements outlined in Urban Development and Building Heights Guidelines, 2018. The minimum separation distances for housing, duplexes and apartments described in the Sustainable Residential Development and Compact Settlements Guidelines, 2024 between blocks and to site boundaries

- 8.39 A comprehensive visual impact assessment is submitted with the planning application. The verified views have been used as an iterative design tool throughout the development evolution to ensure that the design, height, scale and massing assimilate into the landscape and character of the area.
- 8.40 The proposed development is therefore considered to strike an appropriate balance between maximising height and development density whilst working within the confines and constraints on the character of the area and the environmental considerations of the site, in an approach advocated and supported by the Building Height Guidelines.

(vi) Traffic, Access and Parking

- 8.41 The Traffic and Transportation Assessment (TTA) by MHL is included with this Section 32B submission and includes the following conclusions:

“Comparing the analysis of the traffic models, the development will not have a significant negative impact on the operation of these junctions from a capacity point-of-view.”

- 8.42 Car parking provision has been carefully considered, particularly in accordance with SPPR 3 of the Sustainable and Compact Settlements Guidelines for Planning Authorities (2024).
- 8.43 A total of 139 no. car parking spaces is provided for, below the minimum requirements but considered in line with the sustainable policy on encouraging active travel modes of travel. This has regard to the proximity of the site to Killarney Town Centre, and it is appropriate to limit car parking to encourage, where possible alternative sustainable modes of transport.
- 8.44 Bicycle parking is provided across the development in the form of private, shared and visitor parking. Overall, there is 272 no. spaces provided, below the minimum requirements under the SPPR 4 guidance but considered to still provide for adequately to cater for future demand from the development.
- 8.45 This is further set out in the enclosed TTA. The submitted information also includes a Mobility Management Plan (MMP) prepared by MHL Consulting.
- 8.46 The key recommendations on the MMP are:
- “The continued dependence on the motor car is not sustainable in the future. Planning and development of new residential schemes should go hand in hand with a transport strategy limiting the dependability of the private motor car. Current national policy supports this premise for the development of residential areas. The proposed development meets all the criteria associated with this policy. All sustainable modes of transport will be promoted as part of a marketing campaign for the site which will include actively encouraging public transport, walking and cycling as viable modes of transport for residents.”*
- 8.47 It is submitted that it is clear from the above that the proposed development is acceptable in transportation terms. Car parking has been limited to meet the necessary requirements and to ensure that sustainable mobility is encouraged where possible. This is reinforced by the Mobility Management Plan.

- 8.48 The DMURS Statement of Compliance demonstrates that the internal environment of the proposed development will be pedestrian and cyclist friendly and a welcoming, lowly trafficked environment.

(vii) Ecological and Environmental

- 8.49 It is also critical to highlight that the scheme has been developed with the ecological and environmental sensitivity of the site fully in mind. Significant environmental and ecological surveys have been carried out, as referred to in accompanying documentation with this application, and the type and scale of development proposal has been carefully guided by considerations relating to, in particular, visual impact and impact on Natura 2000 sites.

- 8.50 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, & much needed housing delivery, whilst also ensuring that there is no significant negative ecological or environmental impact.

- 8.51 In terms of ecological and environmental matters, we note the following:

- The Ecological Impact Assessment Report by Malone O'Regan concludes that:

“Based on the findings of a detailed desk-based study, a review of all the ecological information available for the Site and wider area and field surveys conducted by suitably qualified MOR Environmental Ecologists, it is considered reasonable to conclude the following:

- *The Site itself is currently considered to be of low local ecological value;*
- *The Site is not considered to be of high suitability or a site of importance for any Annex I or Annex II species or Red-listed birds;*
- *The Proposed Development will not result in any significant impacts on ecological receptors identified both on-site and in the surrounding area following the implementation of appropriate mitigation measures; and,*
- *The proposed Landscape Plan has been designed to compensate for any vegetation removed during Site clearance works”.*

- The enclosed Environmental Impact Assessment Screening by Malone O'Regan concludes that:

“This desk-based EIA Screening Assessment has assessed the potential for the Proposed Development to have significant effects on the environment.

Based on the findings of this EIA Screening Report and relevant shared documents from the Client, the Proposed Development does not require a mandatory/automatic EIA under Schedule 5 Part 1 or Part 2 of the Planning and Development Regulations, 2001 (as amended).

The Proposed Development does align with Schedule 5, Part 2, item 10 (b) (i), namely Construction of more than 500 dwelling units. However, the Proposed Development with 124 residential dwellings is significantly below the threshold. A review of the plan and particulars of the Proposed Development does not indicate that the environmental effects from the construction and operation will result in effects above and beyond those expected from a standard residential development.

A review of the receiving environment does not identify an environment likely to be more susceptible to effect from a development of this type than a 'standard greenfield urban area' as envisaged during the setting of the EIA threshold levels.

There is no real likelihood of significant effects on the environment, having considered the nature, size and location of the Proposed Development during the Construction or Operational Phases and as such does not require a sub-threshold EIA to be carried out in respect of it".

- The enclosed Appropriate Assessment Screening Report by Malone O'Regan concludes that:

"The screening process has examined the details of the Proposed Development and has considered the potential for causing adverse effects on European sites and their qualifying features of interests within a 15km radius of the Site.

Four designated sites - the Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC, Sheheree (Ardagh) Bog SAC, Castlemaine Harbour SAC and Killarney National Park SPA - are located within a 15km radius of the Site. However, given scale and localised nature of the Proposed Development, and the lack of impact pathways between the Site and European sites, as described in Section 4 and Section 6, it can be concluded that the Proposed Development will not result in any significant impacts either directly or indirectly on the conservation objectives or status of the listed European sites and will not result in the direct loss or disturbance of any Annex I habitats and / or Annex II species for which the European sites are designated.

It has been objectively concluded, following an examination, analysis, and evaluation of the relevant information, that the Developments either alone, or in-combination with other plans, projects or land uses, have not had and will not have any direct or indirect significant effects on any European sites in light of the site's conservation objectives and best scientific knowledge, and no reasonable scientific doubt exists in relation to this conclusion.

Accordingly, the progression to Stage 2 of Appropriate Assessment process (i.e., preparation of a Natura Impact Statement) is not considered necessary".

- In terms of flood risk, the Flood Risk Assessment undertaken by Donal Moynihan concludes that:

"I am of the opinion that based on material and Information gathered at stage 2/3, there are minimal risks of flooding on this Assessment Site. Therefore the Residential Development avoids significant risks of flooding in line with the Ministerial Guidelines.

Stage 2/3 of the SSFRA has established sufficient quantitative information is available, appropriate to the scale and nature of the proposed Development for the necessary decision to be reached by both the Assessor and the Planning Authority in accordance with Sequential approach Flow Diagram and the Guidelines in general.

Having regard to the outcomes achieved in stage 2/3 of this SSFRA, it is considered that the avoidance and Mitigation Principles have been applied in an appropriate manner.”