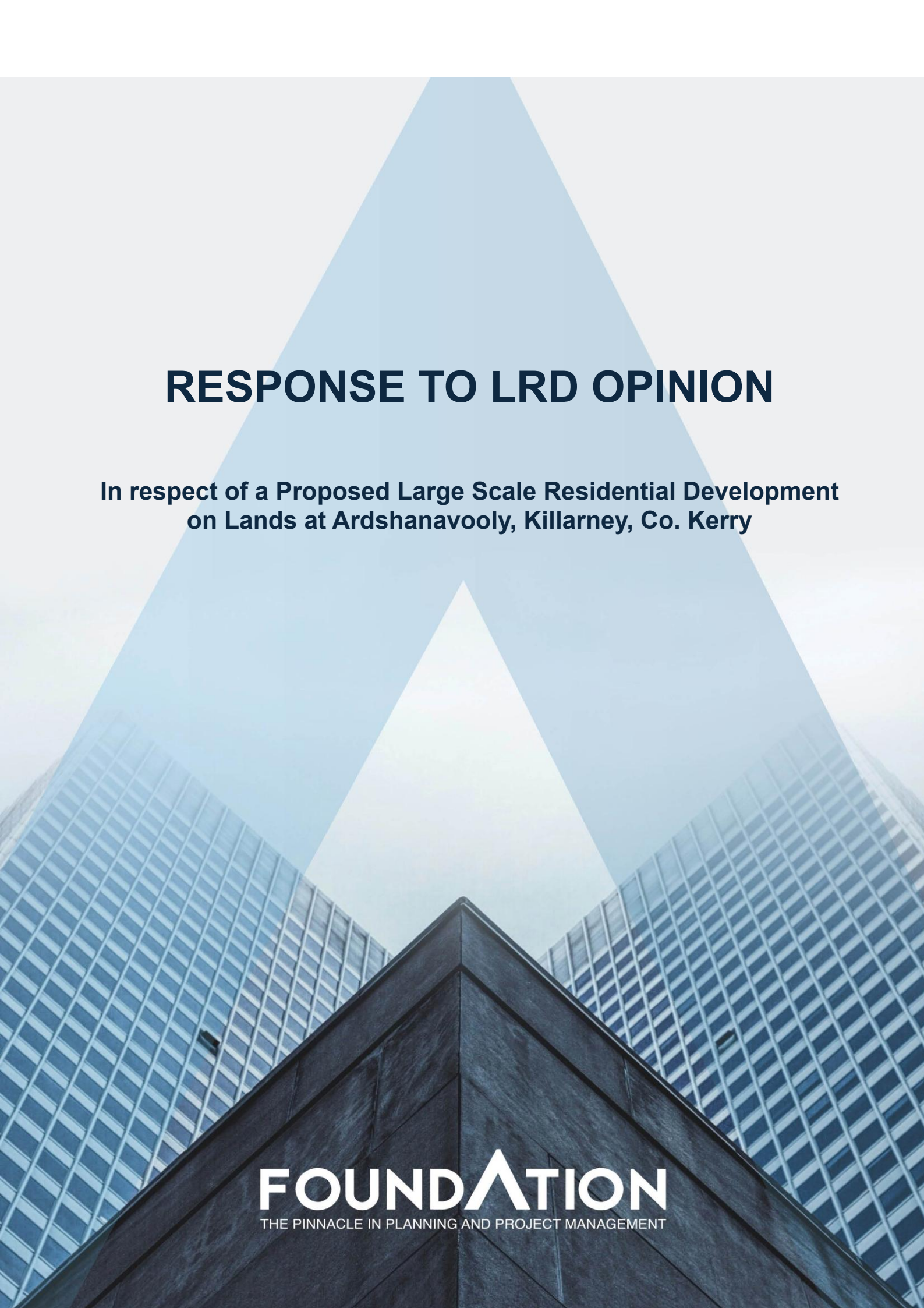




RESPONSE TO LRD OPINION

**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 Ltd

DATE: July 2026

Foundation Management Consultants Ltd
6 Mount St Upper, Dublin 2, D02 VF44

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1.0 INTRODUCTION

- 1.1 This Response to the LRD Opinion by Kerry County Council has been prepared by Foundation on behalf of the applicant, Wrightwood Development Ltd, in support of a planning application for a residential development scheme on lands at Ardshanavooly, Killarney, Co. Kerry
- 1.2 The LRD Opinion by Kerry County Council was issued on the 30th July 2026, and a copy is enclosed at Appendix 1 of this report.
- 1.3 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.

2.0 STRUCTURE AND FORMAT OF LRD OPINION RESPONSE

- 2.1 Each of the issues / items raised in the Opinion are addressed in Section 3.0.
- 2.2 This LRD Response is intended to be a summary of the response to issues raised, with the substantive response often provided in other documents/reports included with the planning application, and where this is the case, clear cross-reference is made to these other documents/reports for ease of reference by Kerry County Council.

3.0 RESPONSE TO SPECIFIC ITEMS RAISED IN LRD OPINION

1. **Engage with KCC Archaeologist and share results of on-site testing**
- 3.1 The project archaeologist has engaged fully with the County Archaeologist.
2. **Part V proposal to provide for social housing only.**
 - **High demand for one-bedroom and two-bedroom social housing units in Killarney.**
 - **KCC would not be in favour of taking studio apartments.**
 - **CC would favour dispersed units throughout the development rather than a single block.**
- 3.2 The Part V proposal is enclosed. In response to the above, the Part V proposal has been updated from that submitted at pre-application stage. Studios have been omitted and Part V units are further dispersed throughout the overall scheme.
3. **Emphasis should be placed on pedestrian and cycling permeability through the site.**
- 3.3 Refer to enclosed Design Statement by Graham R O'Sullivan Architects. In summary, the quantity of typical roadways is minimised throughout the site to provide for alternative pedestrian and cycle friendly circulation routes. Shared surfaced are provided off roadways to reduce vehicle speeds and promote pedestrian and cycle prioritisation. Alternative pedestrian and cycle routes are proved between housing blocks to provide non-vehicular permeability through the site. Vehicular traffic is limited to a "dead-end" road arrangement while cycle and pedestrian paths can avail of through-routes throughout the development.
4. **Road layout must include for connectivity with the adjoining undeveloped lands to the east which are zoned for residential development**
- 3.4 The road layout provides a road to the south-east corner of the site to connect to the site to the east. The location of this future link has been informed by pre-application discussions with the planning authority.
5. **Surface water drainage works should be designed so as to minimise long-term maintenance costs**
- 3.5 Maintenance and operation of the surface water drainage are referred to in the Engineering Assessment and Drainage Report by TPCE, including lifespan components.
6. **CEMP should be submitted with the planning application which should be site specific and should include water management proposals. dust control and noise control measures**
- 3.6 A Construction Environmental Management Plan (CEMP) by TPCE is enclosed. The CEMP is site specific and includes water management proposals and measures for dust and noise control.

7. Resource Management Plan should be submitted

- 3.7 A Resource Management Plan is enclosed and forms part of the Construction Environmental Management Plan by TPCE.

8. Planning application should include proposal for refuse bin storage.

- 3.8 We refer to the Operational Waste Management Plan by MHL Consulting Engineers which sets out proposals for operational waste management, including volume, type and location of waste storage.

9. Service road layout should avoid need for reversing by refuse truck

- 3.9 Refer to Autotrack Drawings issued as part of the application.

10. Query raised regarding diameter of proposed water main

- 3.10 A 150mm diameter watermain is shown in the submitted, calculations and Confirmation of Feasibility. Refer to Engineering Assessment & Drainage Design Report at Page 47.

11. Unauthorised refuse bin store near site entrance. These will restrict / impede the free functioning of the only pedestrian and vehicular access to this development. Enforcement File 9943 refers to this unauthorised bin store. location, with a Warning Letter issued

- 3.11 The bin store referred to is not on the application site. We understand that separate enforcement action is being pursued and we are informed by the applicant that an alternative location is now being sought to allow the bin store to be relocated in the short term.

12. Boundary treatments to houses should be child-proof and maintenance free

- 3.12 Refer to Section 3.5 of the enclosed Landscape Design Rationale which states that:

"The boundary treatment strategy accords with the LRD stage approach and is reflected in the proposed development. Boundary treatments prioritise child safety, durability and long term performance, incorporating concrete post and panel systems, galvanised or powder coated steel railings and weldmesh fencing, with no timber components proposed. A 1.8 m high weldmesh fence is provided along retained ditches, and existing boundaries have been reviewed and supplemented where required to ensure appropriate height, stability and visual screening".

13. Provision of netting should be considered along the northern boundary of the site with the Killarney Pitch and Putt Site

- 3.13 Refer to Section 3.5 of the enclosed Landscape Design Rationale which states that:

"Regarding the boundary with the Pitch and Putt, it is noted on the drawings that the provision of any netting fence is to be agreed with the Pitch and Putt, with the northern boundary formed by an existing hedgerow and any proposed fencing to be

provided from the Pitch and Putt side. Boundary treatments are illustrated on the Boundary Treatment Plan, with construction details provided in Chapter 5.4 – Boundary Details (page 26), confirming that the matters raised at LRD stage have been addressed”.

14. Agree placement of site notices with KCC

- 3.14 Agreement has been reached with the Planning Department in Kerry County Council on the location of the 4 no. site notices.

15. Road dimensions to be shown on drawings

- 3.15 Typical dimensions have been included on the site layout plan.

16. The roadway width should be 6m except for cul de sac less 60m than long, where a width of 5.5m should be acceptable. A reduced roadway width may be approved for short spur cul-de-sac

- 3.16 Note all roadways are minimum 6m wide as shown on the submitted drawings.

17. MHL DMURS document—local street - is silent on > 50 metre dead end cul-de-sac no provision for bin lorry, fire vehicle or commercial vehicle etc to turn

- 3.17 Refer to Autotrack Drawings issued as part of the application.

18. If carrying out any swept path analysis vis Autotrack or similar, Fire Appliance Vehicle dimensions are approx. 9m long with 48m between axles and 30m wide between Wing Mirrors— smaller in length than a bin/waste lorry.

- 3.18 Refer to Autotrack Drawings issued as part of the application.

19. The minimum pipe size shall be 100mm internal diameter In housing Developments of 40 houses and up to houses Developments of 100 houses and above shall have minimum pipe sizes of 150mm internal diameter spine Main with branch Main

- 3.19 A 150mm diameter watermain is shown in the submitted, calculations and Confirmation of Feasibility. Refer to Engineering Assessment & Drainage Design Report at Page 47.

20. Hydrants - This requirement should not take account of dead end or wash-out hydrants which are used for operational flushing. A hydrant should not be closer than 6m to a property

- 3.20 5 no. hydrants are proposed and are between 6 metres and 46 metres from all buildings.

- 21. BCA note — is the existing watermain feeding this new 150mm diameter watermain the same diameter or smaller. If smaller a discussion/review with Irish Water is advisable**
- 3.21 There is a 110 diameter watermain connecting to 150mm diameter watermain. The Confirmation of Feasibility confirms connection without infrastructure upgrades.
- 22. For buildings (including apartment buildings), at least 5% of the total number of spaces should be designated carparking spaces, with a minimum provision of at least one such space.**
- 3.22 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. 62 no. spaces are in curtilage. That means that 81 no. spaces are subject to the 5% requirement. 5% of 81 is 4 spaces. The proposed provision of 5 no. spaces therefore exceeds the minimum requirement.
- 23. High-speed ready in building physical infrastructure up to a network termination point (Both dwellings and Multi Unit — See attached Circular)- Now required per attached Circulars**
- 3.23 In line with the “European Union (In-Building Physical Infrastructure for High-Speed Electronic Communications) Regulations 2023 each dwelling is designed to be able to take in a fibre broadband connection via an external telecoms duct (Siro or Eir) and internally the broadband is extended to the TV point location via a Cat 6 and/or Coax cable. The coax cable serves any terrestrial (Saorview) service requirement.
- 24. Radon Membrane & Sumps required**
- 3.24 Radon membrane & sumps will be provided in all dwellings.
- 25. Dwellings: electric Vehicle Recharging to be complied with. Multi-unit building containing one. or more than dwelling— recharging point requirement to be complied with. Ducting infrastructure, consisting of conduits for electric etc to be complied with.**
- 3.25 Electric Vehicle Recharging infrastructure shall be provided for all car parking within curtilage of each dwelling unit. The location of EV charging points for car parking spaces located outside curtilage is shown on the submitted drawings (see Proposed Site Layout by R Graham O’Sullivan Architect).
- 26. Caution when selecting a Building Product or System i.e. check Table 1 — regards achieving compliance**
- 3.26 This is noted, however it is not an issue or consideration relevant to this planning stage of the project.

- 27. Hydrant Locations - A check is required to confirm Hydrant locations. Some Turning Bays — none provided — look at Table 24 TGD B**
- 3.27 5 no. hydrants are proposed and are between 6 metres and 46 metres from all buildings. TPCE have checked the location requirements and confirm compliance with Table 24 of TGD Part B.
- 28. Attenuation tanks & Hydro brake's - who maintains the Siit traps both upstream and downstream of the tanks? (Debris Monthly & Silt Every 6:months) (Take in charge item)**
- 3.28 No Hydrobrake is proposed. The attenuation solution is wholly on site infiltration. It is proposed that silt traps will be taken in charge along with other road infrastructure.
- 29. Klargester Bypass Separator/s —who maintains separator = (Oil Levels —3 months or as per Aarm (Take in charge item) is one provided**
- 3.29 There is no separator proposed.
- 30. Soak Away crates what is the loading ability here. Regards a: car or vehicle parking**
- 3.30 All soakaways are in pedestrian area. Structural crates (Aquacell CoreR or equal approved) to be used.
- 31. Petrol Interceptor surface water none shown**
- 3.31 There is no petrol interceptor proposed. Bioretention unit is preferable to petrol interceptor as per SUDs manual (cheaper to maintain / not a wildlife hazard / Nature based solution preferred). Specialist geotextile incorporated below pavement layer to prevent hydrocarbons entering soil as per Engineering Assessment Report.
- 32. Will the proposed off-site Creche extension (to cater for this LRD) be completed and operational before this development is occupied?**
- 3.32 The proposed development does not include a childcare facility due to the fact that a childcare facility on an adjacent site has been deliberately sized to accommodate the proposed development. Calculations have been carried out to determine the childcare need in the area, which will be served by this creche. We note the following:
- Reg. Ref: 04/204149 originally granted 49 houses and 40 apartments. Total of 89 units. The Childcare Guidelines would require a creche of 24 places for this scheme (20 places per 75 units, or 0.266 per unit).
 - Reg. Ref: 18/221 added another 10 units — a further 3 childcare places
 - Reg. Ref: 18/222 added another 15 units — a further 4 childcare places.
 - Reg. Ref: 20/1237 added another 18 apartments — a further 5 childcare places
 - Reg. Ref: 23/991 added a further 14 apartments — a further 4 childcare places

- 3.33 The above totals a requirement for 40 places.
- 3.34 Reg. Ref: 25/60046 – extended the size of the creche to 108 no. childcare places in total.
- 3.35 Based on the above:
- Childcare demand for existing residential: 40 places
 - Childcare demand for proposed residential: 26 places
 - Total childcare demand: 66 places
 - Childcare places permitted: 108 places
 - Surplus: 42 places
- 3.36 On a conservative basis, it is assumed that these 40 places will be taken up by a wider catchment demand, both existing and proposed.
- 3.37 The creche is at an advanced stage of construction and is due for completion in late Q2 2026. The creche will therefore be in operation well before any development associated with this LRD has been completed.
- 33. Should provision be made for a pedestrian / cyclist link (from the southeast corner in this development) to the Deerpark Retail Park to the east be allowed for given the prioritisation given to pedestrian and cyclist movements and connectivity in this proposed development? The residentially zoned site to the east and the proposed relief road should both then make provision for same**
- 3.38 The road layout provides a road to the south-east corner of the site to connect to the site to the east. The location of this future link has been informed by pre-application discussions with the planning authority. This link allows for pedestrian and cyclist permeability.
- 34. What is the current and proposed use of the area between the red site boundary and blue land ownership boundary at the western half of the southern boundary — is it part of this development or not? What is its intended use? Will it be subject to anti-social behaviour? Does this proposed site extend to the existing Col Corann residential development in this area?**
- 3.39 This area is excluded from the proposed development. It is not required for the proposed development to function in terms of a logical and legible layout, nor for open space or circulation requirements.
- 3.40 The applicant is aware that there may be a future requirement for this land to facilitate access for maintenance of Dennehy's Boreen from the existing internal estate roads. This does not form part of the proposed development, nor is it in any way relate to the proposed development. The land is omitted from the proposed development to preserve it for this potential future maintenance route.

35. Divert/underground the overhead ESB line running south-north through this site

- 3.41 The overhead ESB line will be relocated underground as part of the proposed development.

36. KCC Taking in Charge Policy precludes the taking in charge of apartment developments and allocated parking spaces

- 3.42 A Taking in Charge drawing by TPCE is enclosed under separate cover. For clarity, road/footpath and public open space infrastructure is proposed to be taken in charge. There is no proposal for apartment blocks or car parking spaces associated with apartment blocks to be taken in charge.

37. Large stones / timber trunks in communal areas — not ideal for TIC due to high risk of accidents. IPB may not insure

- 3.43 Refer to Section 3.5 of the enclosed Landscape Design Rationale which states that:

“The approach to communal areas follows that presented at LRD stage and has been carried through into the current proposal. To ensure suitability for Taking in Charge, the material specification for seating within communal areas has been clarified, with seating to be of concrete or steel construction, providing durability, safety and low maintenance. Elements such as large loose stones or timber features are not proposed within communal areas. The layout and treatment of communal areas are illustrated in Chapter 3.4 – Masterplan Details (page 12), with material specifications clarified on the relevant drawings”.

38. Heavy duty benches bolted down required in areas for TIC

- 3.44 Refer to Section 3.5 of the enclosed Landscape Design Rationale which states that:

“The approach to communal areas follows that presented at LRD stage and has been carried through into the current proposal. To ensure suitability for Taking in Charge, the material specification for seating within communal areas has been clarified, with seating to be of concrete or steel construction, providing durability, safety and low maintenance. Elements such as large loose stones or timber features are not proposed within communal areas. The layout and treatment of communal areas are illustrated in Chapter 3.4 – Masterplan Details (page 12), with material specifications clarified on the relevant drawings”.

39. The adopted KCC Taking in Charge Policy precludes the taking in charge of Apartments and associated parking; allocated car parking spaces etc. This development cannot be taken in charge in advance of the spine road / area immediately south of this development being taken in charge. Visitor and disabled parking spaces, if identified, can be considered for taking in charge? Are they to be labelled on site?

- 3.45 A Taking in Charge drawing by TPCE is enclosed under separate cover. For clarity, road/footpath and public open space infrastructure is proposed to be taken in charge. There is no proposal for apartment blocks or car parking spaces associated with apartment blocks to be taken in charge.

- 3.46 Noted in terms if timing for taking in charge following the spine road taking in charge.
- 3.47 Visitor and disabled parking spaces are labelled on the submitted drawings and are identified on the Taking in Charge drawing.

40. Management company required for apartment blocks and their curtilages?

- 3.48 Yes, a management company is required for the apartment buildings, their associated communal open space, and any associated parking areas, bin stores, and bicycle parking.

41. 1.8m high weldmesh fence to be provided on the development side of any existing ditches being retained to render these boundaries childproof.

- 3.49 Refer to Section 3.5 of the enclosed Landscape Design Rationale which states that:

"The boundary treatment strategy accords with the LRD stage approach and is reflected in the proposed development. Boundary treatments prioritise child safety, durability and long term performance, incorporating concrete post and panel systems, galvanised or powder coated steel railings and weldmesh fencing, with no timber components proposed. A 1.8 m high weldmesh fence is provided along retained ditches, and existing boundaries have been reviewed and supplemented where required to ensure appropriate height, stability and visual screening".

42. Existing site boundaries for retention need to be assessed in terms of height, stability, maintenance free (no timber components), visual barrier, childproof-ness etc

- 3.50 Refer to Section 3.5 of the enclosed Landscape Design Rationale which states that:

"The boundary treatment strategy accords with the LRD stage approach and is reflected in the proposed development. Boundary treatments prioritise child safety, durability and long term performance, incorporating concrete post and panel systems, galvanised or powder coated steel railings and weldmesh fencing, with no timber components proposed. A 1.8 m high weldmesh fence is provided along retained ditches, and existing boundaries have been reviewed and supplemented where required to ensure appropriate height, stability and visual screening".

43. What is existing boundary at the eastern half of the southern boundary (along the red line)?

- 3.51 This boundary comprises post and panel fencing forming the rear boundary of the existing dwellings to the south.

44. No timber components on any boundary fronting onto communal areas. Timber is not permanent, durable or maintenance free

- 3.52 Refer to Section 3.5 of the enclosed Landscape Design Rationale which states that:

“The boundary treatment strategy accords with the LRD stage approach and is reflected in the proposed development. Boundary treatments prioritise child safety, durability and long term performance, incorporating concrete post and panel systems, galvanised or powder coated steel railings and weldmesh fencing, with no timber components proposed. A 1.8 m high weldmesh fence is provided along retained ditches, and existing boundaries have been reviewed and supplemented where required to ensure appropriate height, stability and visual screening”.

45. Stop/yield signs, thermoplastic lines and unit number directional signs are required at all internal junctions

- 3.53 Please refer to submitted drawing 91-24-1-818 (Proposed Roadmarkings & Signage Layout) by TPCE.

46. Adequate passive overlooking of all communal green open spaces eg the Environmental Open Spaces along the northern and eastern boundaries? Are these accessible to residents / non-residents?

- 3.54 Refer to Section 3.5 of the enclosed Landscape Design Rationale which states that:

“The proposed development provides a clear hierarchy of open spaces, comprising Public Open Space, Communal Open Space and Environmental Open Space, distributed throughout the site to ensure accessibility, usability and passive surveillance. All principal open spaces are overlooked by adjacent residential units and internal streets, contributing to safety and placemaking. Environmental Open Spaces are strategically located along site boundaries, functioning as transitional areas that provide ecological protection, visual filtering and landscape integration with the surrounding context. The overall open space strategy is illustrated and discussed within Chapter 3.3 – Masterplan Analysis (page 10) and Chapter 3.4 – Masterplan Details (page 12), with the quantum and compliance of open space demonstrated in Chapter 5.3 – Open Space Calculation (page 25)”.

47. Turning areas/autoturn drawings for turning of refuse and fire trucks east of block C and at NW and NE cul de sacs? Otherwise refuse trucks, delivery trucks, fire engines etc will have to reverse long distances to turn - unsafe for children.

- 3.55 Refer to Autotrack Drawings issued as part of the application.

48. 100mm thick bituminous surfacing to estate road. The permeable car parking is not as durable as dense surfacing and will require ongoing regular maintenance to keep it permeable.

- 3.56 Cobble-lock is proposed. Requires maintenance as with all SUDs measures.

49. The permeable car parking spaces will need to be delineated with colour contrasting pavers (thermoplastic lining on pavers cracks etc)

- 3.57 The permeable car parking spaces will be delineated by colour contrasting pavers.

- 50. How will pedestrians and car drivers differentiate shared surface from no shared surface road?**
- 3.58 Car parking spaces will be delineated by non-permeable colour contrasting concrete pavements integrated into the permeable paving system. Disabled accessible spaces and disabled accessible spaces with electrical charging positions shall be identified with the relevant pictograms applied to concrete paving slabs within the pavements and supplemented with pole mounted signage at each space.
- 51. There are poor gradients on the existing foul sewer immediately south of the site which may need to be assessed prior to finalising finished floor levels etc. the northern half of the. existing spine road is not taken in charge and Uisce Eireann will require the arterial wastewater and water services through this section of private spine road to be to their satisfaction. Existing foul sewer gradients need to be checked.**
- 3.59 Gradients of existing foul pipes to the south are 1:100 & 1:93, which is acceptable. Note pipe adjacent to Sail Ardain re-laid approx 3 years ago (1:93).
- 52. The main flood risk to the development is associated with pluvial flooding and failure of the proposed storm drainage and SUDS system within the site, In this regard it is critical that the proposed surface water drainage systems are designed, built and maintained correctly. All storm water drainage and SuDS infrastructure to be designed and constructed in line with industry standards to maintain greenfield site runoff conditions.**
- 3.60 No run off is proposed, wholly on site infiltration.
- 53. Note the proposal for multiple soakaways, infiltration blankets, bio-retention areas, tree pits and pervious paving Any proposal for same needs to be supported by comprehensive site investigations to confirm the soil infiltration rates are suitable for a largescale development**
- 3.61 Soil infiltration testing carried out (25.03.2025) & is documented in submitted On-Site Infiltration Report dated 03.04.25.
- 54. A detailed Operation and Maintenance Plan and Schedule for the storm drainage and SUDS infrastructure needs to be provided**
- 3.62 Maintenance and operation of the surface water drainage are referred to in the Engineering Assessment and Drainage Report by TPCE, including lifespan components.
- 55. The lighting, drainage, landscaping and other biodiversity related recommendations which are contained in the ecological reports should be clearly incorporated into the plans**
- 3.63 Careful consideration has been given to ensuring continuity and consistency between the interrelated design considerations and reports referenced above.
- 56. The response to the issues raised in the further information request around the submission received from the Department of Housing, Local**

Government and Heritage on the previous application 26/60009 is noted and should be integrated into all assessments accompanying the application.

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

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

influence of the applicant. It is clear from the County Development Plan references above that there are other studies underway to address this issue, such issue being entirely unrelated to the proposed development. It is further clear that the proposed development will discharge foul water only (no surface or stormwater) to a WWTP which has capacity to accept it.

- It is noted for clarity that the Department of Housing, Local Government and Heritage submission on the now withdrawn planning application stated that *“While the Killarney WWTP appears to have capacity for treatment for the extra PPE which would be required from this development, there is a problem with the volume of storm-water overflow discharges from holding tanks at the WWTP, which discharge via the Folly Stream into the Ross Bay part of the SAC1. It is important that the development does not result in an additional contribution to storm overflow discharges to Ross Bay”*. It is not clear that the Department understood that the stormwater for the proposed development will not discharge to the WWTP.
 - Notwithstanding the above, we understand that part of the wider measures that may be undertaken by the local authority to address the post WWTP issues is the separating out of the combined sewer on Park Road to separate storm/surface and foul water sewers, to assist with discharging less surface/storm water to the WWTP. In this regard, the applicant is willing to accept a condition under Section 48(2)(c) of the Planning and Development Act 2000, as amended, which requires the applicant to make a reasonable contribution to the cost of the works for separating the sewers, on the basis that the removal of this storm/surface water from the combined sewer will reduce discharge of same to the WWTP and ensure that the foul loading from the proposed development will not increase overall loading to the WWTP.
- 3.65 In addition to the above, we note that item 2 of the further information request on the previous application was as follows:
- “You are requested to submit a revised AA Screening report and where necessary a NIS, taking into account matters raised in the submission received from the Department of Housing, Local Government and Heritage and any amendments to the proposal arising from this request for further information, as appropriate.*
- 3.66 We refer to the enclosed correspondence (see Appendix 1 of the application cover letter) from Malone O'Regan Environmental which concludes that:
- “it remains the professional opinion of MOR Environmental that the Proposed Development is not likely to have significant effects on any European site, either alone or in combination with other plans or projects. Therefore, progression to Stage 2 of the Appropriate Assessment process, Natura Impact Statement ('NIS'), was not required at the time of application and is not required in response to this Request for Further Information”.*
- 3.67 Having regard to the above, all issues raised in the further information request on the previous application have been fully addressed in this current application.

APPENDIX 1

Copy of LRD Opinion



COMHAIRLE CONTAE CHIARRAÍ
KERRY COUNTY COUNCIL

Guthán | Tel 066 7183582 Rphost | Email plan@kerrycoco.ie Suíomh | Web www.kerrycoco.ie

30th July 2026

Mr Robert Keran,
Foundation Planning and Project Management,
6 Upper Mount St,
Dublin 2,
D02 VF44

**Re: Planning and Development Act, 2000 (as amended) – Section 32D, Large Scale Residential Development Opinion.
Proposed Large-Scale Residential Development (LRD) at Ardshanavooly, Killarney comprising 123 dwelling units and site development works.**

Applicant: Wrightwood Developments Ltd

Dear Mr Keran,

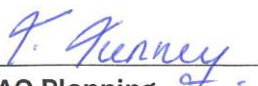
I refer to LRD Meeting held via Teams on 24/07/2026.

Having regard to:

- (a) The provisions of Project Ireland 2040 – National Planning Framework,
- (b) The provisions of Housing for All – A New Housing Plan for Ireland,
- (c) The provisions of Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities, 2024,
- (d) The location of the site within the development boundary of Killarney,
- (e) The R1 – New/Proposed Residential Zoning of the land,
- (f) The feasibility of connection of the development to public water supply and public foul sewerage networks,
- (g) The pattern of existing development in the vicinity,
- (h) The draft layout of the proposed development,
- (i) The density and housing mix proposed,
- (j) The distance of the site from the nearest Natura 2000 Site,
- (k) The location in Flood Zone C,

It is the opinion of Kerry County Council that the draft proposed development constitutes a reasonable basis on which to make an application for planning permission.

Kind Regards,


AO Planning





Planning & Development (Amendment)
(Large-Scale Residential Development) Act, 2021

Large Residential Development (LRD) Meeting
Held on Friday 24th July via teams.

Reference Number: PP26/260
Applicant Name: Wrightwood Developments Ltd
Site Location: Ardshanavooly, Killarney

ATTENDEES:

Robert Keran

Foundation Planning and Project Management Consultants

KERRY COUNTY COUNCIL

Fiona O'Sullivan
Sean Flahive

Kerry County Council, Planning Dept
Kerry County Council, Planning Dept

A formal request for LRD Meeting was received by Kerry County Council on 23rd July 2026 from Foundation Management Consultants on behalf of Wrightwood Developments Ltd in relation to a residential development of 123 units on their land at Ardshanavooly, Killarney. Within 4 weeks of the Section 32B LRD Meeting, KCC will issue LRD Opinion to the applicant as to whether the proposal constitutes a reasonable basis on which to make an application for planning permission.

Applicant's Presentation

Robert Keran made a presentation on behalf of the applicant giving a description of the site and its context. The subject site, which is 2.23 hectares in area and zoned R1 – New/Proposed Residential, is located north of Park Road. The site is bounded by residential to the south, Dennehy's Bohereen to the west, Killarney Pitch and Putt Course to the north and greenfield lands zoned R1 – New/Proposed Residential to the east. It was explained that this application only varies slightly from the development proposed under pp ref 26/60009, that deemed to be withdrawn by the Planning Authority on 17th July 2026.

The draft layout for the proposed development provides for a total of 123 dwelling units (one less than 26/60009) and site development works. The breakdown of the residential units is as follows:

- 16 no. one-bedroom apartments,
- 6 no. two-bedroom apartments,
- 11 no. one-bedroom duplex units,
- 11 no. two-bedroom duplex maisonettes,
- 28 no. two-bedroom duplex apartments,
- 28 no. three-bedroom maisonettes and
- 23 no. three-bedroom terraced houses.

Kerry County Council response – in the interests of clarity please consult the following points in your planning application.

1. Archaeology – Engage with County Archaeologist and share results of on-site testing.
2. Part V -
 - (a) Part V proposal to provide for social housing only.
 - (b) High demand for one-bedroom and two-bedroom social housing units in Killarney.
 - (c) KCC would not be in favour of taking studio apartments.

- (d) KCC would favour dispersed units throughout the development rather than a single block.

Roads and Connectivity

3. Emphasis should be placed on pedestrian and cycling permeability through the site.
4. Roads Layout must include for connectivity with adjoining undeveloped lands to the east which are zoned for residential development.

Surface Water

5. Surface water drainage works should be designed so as to minimise long term maintenance costs.

Environment -

6. CEMP should be submitted with the planning application which should be site specific and should include water management proposals, dust control and noise control measures.
7. Resource Management Plan should be submitted.

Fire Safety and Building Control

8. Planning application should include proposals for refuse bin storage.
9. Service road layout should avoid need for reversing by refuse truck.
10. Query raised diameter of proposed water main.

Taking in Charge

11. Unauthorised bin store to the rear site entrance. These will restrict the free functioning of the only pedestrian and vehicular access to this development. Enforcement file 9943 refers to this unauthorised bin store, location – warning letter issued.
12. Boundary treatments to houses should be child-proof and maintenance free
13. Provision of netting should be considered along the northern boundary of the site with the Killarney Pitch and Putt Site.
14. Agree placement of site notices with KCC
15. Road dimensions to be shown on drawings
16. The roadway width should be 6m except for cul de sac less 60m than long, where a width of 5.5m should be acceptable. A reduced roadway width may be approved for short spur cul-de-sac
17. MHL DMURS document—local street - is silent on > 50 metre dead end cul-de-sac no provision for bin lorry, fire vehicle or commercial vehicle etc to turn
18. If carrying out any swept path analysis vis Autotrack or similar, Fire Appliance Vehicle dimensions are approx. 9m long with 48m between axles and 30m wide between Wing Mirrors— smaller in length than a bin/waste lorry.
19. The minimum pipe size shall be 100mm internal diameter In housing Developments of 40 houses and up to houses Developments of 100 houses and above shall have minimum pipe sizes of .t50mm internal diameter spine Main with branch Main
20. Hydrants - This requirement should not take account of dead end or wash-out hydrants which are used for operational flushing. A hydrant should not be closer than 6m to a property.
21. BCA note — is the existing watermain feeding this new 150mm diameter watermain the same diameter or smaller. If smaller a discussion/review with Irish Water is advisable
22. For buildings (including apartment buildings), at least 5% of the total number of spaces should be designated carparking spaces, with a minimum provision of at least one such space.
23. High-speed ready in building physical infrastructure up to a network termination point (Both dwellings and Multi Unit — See attached Circular)- Now required per attached Circulars
24. Radon Membrane & Sumps required
25. Dwellings: electric Vehicle Recharging to be complied with. Multi-unit building containing one. or more than dwelling— recharging point requirement to be complied with. Ducting infrastructure, consisting of conduits for electric etc to be complied with.
26. Caution when selecting a Building Product or System i.e. check Table 1 — regards achieving compliance

27. Hydrant Locations - A check is required to confirm Hydrant locations. Some Turning Bays — none provided — look at Table 24 TGD B
28. Attenuation tanks & Hydro brake's - who maintains the silt traps both upstream and downstream of the tanks? (Debris Monthly & Silt Every 6 months)
29. Klargestor Bypass Separator/s —who maintains separator = (Oil Levels —3 months or as per Aarm (Take in charge item) is one provided
30. Soak Away crates what is the loading ability here. Regards a: car or vehicle parking
31. Petrol Interceptor surface water none shown
32. Will the proposed off-site Creche extension (to cater for this LRD) be completed and operational before this development is occupied?
33. Should provision be made for a pedestrian / cyclist link (from the southeast corner in this development) to the Deerpark Retail Park to the east be allowed for given the prioritisation given to pedestrian and cyclist movements and connectivity in this proposed development? The residentially zoned site to the east and the proposed relief road should both then make provision for same
34. What is the current and proposed use of the area between the red site boundary and blue land ownership boundary at the western half of the southern boundary — is it part of this development or not? What is its intended use? Will it be subject to anti-social behaviour? Does this proposed site extend to the existing Col Corann residential development in this area?
35. Divert/underground the overhead ESB line running south-north through this site.
36. KCC Taking in Charge Policy precludes the taking in charge of apartment developments and allocated parking spaces.
37. Large stones / timber trunks in communal areas — not ideal for TIC due to high risk of accidents. IPB may not insure.
38. Heavy duty benches bolted down required in areas for TIC.
39. The adopted KCC Taking in Charge Policy precludes the taking in charge of Apartments and associated parking; allocated car parking spaces etc. This development cannot be taken in charge in advance of the spine road / area immediately south of this development being taken in charge. Visitor and disabled parking spaces, if identified, can be considered for taking in charge? Are they to be labelled on site?
40. Management company required for apartment blocks and their curtilages?
41. 1.8m high weldmesh fence to be provided on the development side of any existing ditches being retained to render these boundaries childproof.
42. Existing site boundaries for retention need to be assessed in terms of height, stability, maintenance free (no timber components), visual barrier, childproof-ness etc
43. What is existing boundary at the eastern half of the southern boundary (along the red line)?
44. No timber components on any boundary fronting onto communal areas. Timber is not permanent, durable or maintenance free
45. Stop/yield signs, thermoplastic lines and unit number directional signs are required at all internal junctions
46. Adequate passive overlooking of all communal green open spaces eg the Environmental Open Spaces along the northern and eastern boundaries? Are these accessible to residents / non-residents?
47. Turning areas/autoturn drawings for turning of refuse and fire trucks east of block C and at NW and NE cul de sacs? Otherwise refuse trucks, delivery trucks, fire engines etc will have to reverse long distances to turn - unsafe for children.
48. 100mm thick bituminous surfacing to estate road. The permeable car parking is not as durable as dense surfacing and will require ongoing regular maintenance to keep it permeable.
49. The permeable car parking spaces will need to be delineated with colour contrasting pavers (thermoplastic lining on pavers cracks etc)
50. How will pedestrians and car drivers differentiate shared surface from no shared surface road?

Flooding and SUDs

51. There are poor gradients on the existing foul sewer immediately south of the site which may need to be assessed prior to finalising finished floor levels etc. the northern half of the existing spine road is not taken in charge and Uisce Eireann will require the arterial wastewater and water services through this section of private spine road to be to their satisfaction. Existing foul sewer gradients need to be checked.
52. The main flood risk to the development is associated with pluvial flooding and failure of the proposed storm drainage and SUDs system within the site, In this regard it is critical that the proposed surface water drainage systems are designed, built and maintained correctly. All storm water drainage and SUDs infrastructure to be designed and constructed in line with industry standards to maintain greenfield site runoff conditions.
53. Note the proposal for multiple soakaways, infiltration blankets, bio-retention areas, tree pits and pervious paving Any proposal for same needs to be supported by comprehensive site investigations to confirm the soil infiltration rates are suitable for a largescale development.
54. A detailed Operation and Maintenance Plan and Schedule for the storm drainage and SUDs infrastructure needs to be provided.

Environmental Assessment

55. The lighting, drainage, landscaping and other biodiversity related recommendations which are contained in the ecological reports should be clearly incorporated into the plans.
56. The response to the issues raised in the further information request around the submission received from the Department of Housing, Local Government and Heritage on the previous application 26/60009 is noted and should be integrated into all assessments accompanying the application.

KCC will issue LRD Opinion to the applicant by 21st August 2026 and will be available for further pre-planning consultation under Section 247 of the Planning and Development Act, 2000 (as amended) after the LRD Opinion is issued.