

Planning Statement

Proposed Large-scale Residential Development, Countess Road, Killarney, Co. Kerry

Client: Dipharma Unlimited Company

May 2025

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Introduction

1.1 Purpose of Statement

This Planning Statement has been prepared on behalf of Dipharma Unlimited Company and accompanies an application for a Large-scale Residential Development of 259 no. units at a site located at Countess Road, Dromhale (townland), Killarney, Co. Kerry.

This statement outlines and considers the principal planning matters, as discussed with Kerry County Council during the S.247 pre-planning meeting and subsequent 32B LRD opinion. The feedback from these stages have been incorporated into the final design, which has been developed in positive partnership with the local planning authority.

1.2 Development Context

Dipharma Unlimited Company are seeking permission from Kerry County Council for a proposed Large-scale Residential Development (LRD) located on Countess Road, Killarney consisting of the the demolition of 2 no. existing two-storey semi-detached dwelling houses and an existing ruinous structure on the site and construction of 103 no. two storey houses (3-bed units), comprising of 27 no. terraced units, 62 no. end of terrace units, and 14 no. side entry units, 82 no. courtyard apartment units over 2 no. storeys (42 no. 1-bed units, 40 no. 2-bed units), and 74 no. apartment units (34 no. 1-bed units, 40 no. 2-bed units) in 2 no. part 3 storey and part 4 storey blocks.

Vehicular access to the proposed development will be via one entrance from Countess Road (L2016) to the north, with the entrance design including improvement works on the public road inclusive of a raised crossing point. The design includes pedestrian/cycle infrastructure to/from Countess Road and internally within the development site and to adjoining areas.

Ancillary site works include car parking, provision of bicycle parking and bin storage facilities serving the proposed apartment/courtyard apartment buildings and creche, 2 no. ESB substations, landscaping, water services and drainage infrastructure (including foul and storm network upgrades in Countess Grove), and all associated site development works. The proposed development also provides for the demolition of existing site boundary walls along Countess Road.

A Natura Impact Statement (NIS) has been prepared and will be submitted to the Planning Authority with the application.

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Site Context

2.1 Site Location

The development site is c.6.0 ha in size[1] and is located under 1km to the north east of Killarney Town Centre. While the site itself is currently in agricultural use, it is in an area that is characterised by existing residential, educational and recreational uses. It is bounded to the north by Countess Road, to the east and south by agricultural lands; and to the west by mature residential development of Countess Grove. On the opposite side of Countess Road there are multiple dwellings and an apartment complex. It is in close proximity to St. Oliver's Primary School to the east and is also close to Killarney Train Station and Killarney Bus Station to the north of the site. The site is a short walking distance of Killarney Town Centre to the west of the site.

The area is categorised as an Urban Neighbourhood within a Key Town as per the Sustainable Residential Development and Compact Settlement Guidelines. The subject site is c.750 m walk to the high street, Killarney town centre and is greenfield in nature. The lands are bounded by the Countess Road to the north and existing residential development to the western and southern boundaries. The site is well positioned to capitalise on its location as it enjoys walking, cycling and public transport links to the adjacent town and commercial centres.

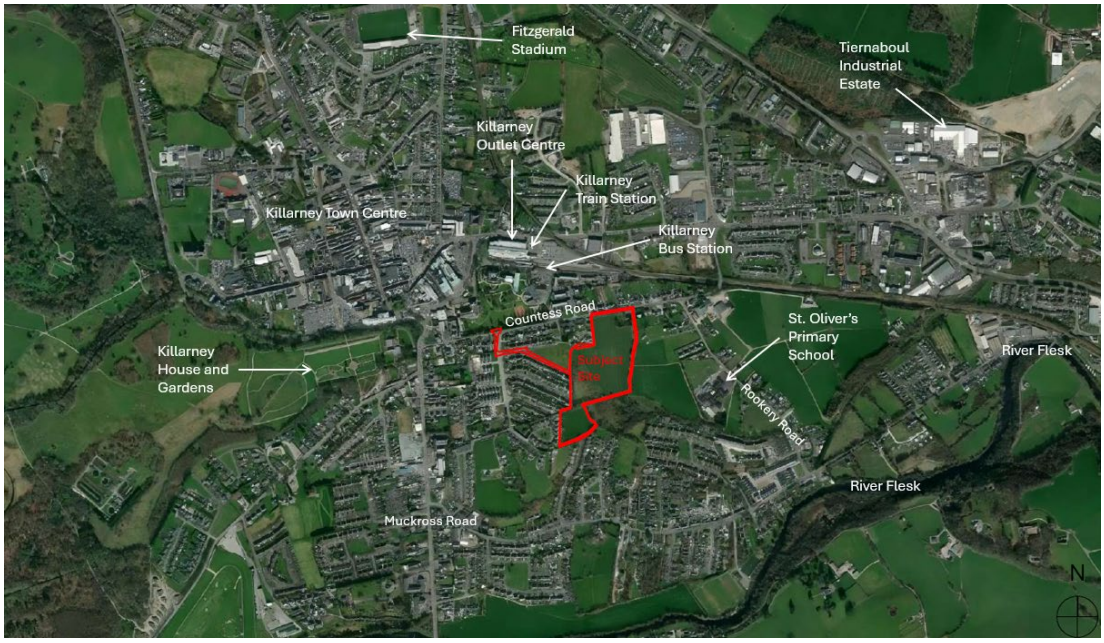


Figure 2-1: Aerial View of the Site and Surrounding Context. Source: Google Maps, annotations by HW Planning

As outlined above, the existing residential community in the area is supported by urban amenities including: an existing primary school, Killarney Town Centre, Killarney Outlet Centre, Killarney Bus Station, Killarney Train Station, and Tiernaboul Industrial Estate. It has the benefit of proximity to a range of recreational and amenity areas including Killarney House and Gardens, Fitzgerald Stadium, Dr Crokes GAA Club, and Deerpark Pitch and Putt Club.

Strategically, Killarney is a principal driver of economic growth in County Kerry and wider South West Region. It is a market leader in tourism, specialized engineering and the knowledge economy with a job to resident worker ratio of 1.25 which is higher than the Southern Region's average of 1.06. The Kerry County

[1] The Red-line boundary for the application is 6.44ha.

Development Plan 2022 (CDP) which came into effect in August 2022 categorizes Killarney as one of the two Key Towns in the county and identifies a population growth projection of 1,630 persons in Killarney by 2028, 17% of the total envisaged population growth of the county. **Table 3.7** included in the CDP calculates the housing requirement to meet this population target for Killarney as 1,277 units.

This planned growth, coupled with a well-documented shortage of housing for employees, including those specifically employed in the services sector, means there is a pronounced need to provide new homes locally.

2.2 Site History

There is no formal planning history on the subject site which is consistent with the use of the lands for agricultural purposes.

2.3 Proposed Development

The applicant is seeking planning permission for the demolition of 2 no. existing two-storey semi-detached dwellings to the north of the site and construction of 259 no. units comprising 103 no. two storey houses (3-bed units), 82 no. own-door maisonette units (42 no. 1-bed units, 40 no. 2-bed units), and 74 no. apartment units (34 no. 1-bed units, 40 no. 2-bed units).

Total Residential Units	**259**
Houses	
3 Bedroom	103
Maisonette Apartments	
1 Bedroom	42
2 Bedroom	40
Apartments	
1 Bedroom Apartment	34
2 Bedroom Apartment	40

Ancillary site works include car parking, provision of bicycle parking and bin storage facilities serving the proposed apartment/courtyard apartment buildings and creche, 2 no. ESB substations, landscaping, water services and drainage infrastructure (including foul and storm network upgrades in Countess Grove), and all associated site development works. The proposed development also provides for the demolition of existing site boundary walls along Countess Road.

Key Site Statistics	
Total Site Area (ha)	6.44 ha (Residential Site is 6 ha)
Residential Developable Site Area (ha)	5.77 ha

Density (units per ha)	45 units per ha
Open Space Provision (%)	11%
Communal Open Space	2,406 m^2
Car Parking Provision	277 spaces Residential – 241 Visitor – 12 Accessible – 14 Creche – 10
Bicycle Parking Provision	320

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LRD Opinion

On the 12th January 2026 Kerry County Council held a Section 32 LRD Meeting with the design team to discuss the proposed development. Subsequently, on the 4th February 2026, the Council issued their formal Section 32 LRD Opinion that proposals constituted a reasonable basis to make the full application:

I refer to LRD Meeting held in the Council Chambers, County Buildings. Tralee on 12/01/2026.

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 majority 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

The Opinion was accompanied by Kerry County Council's minutes of the meeting, which are replicated below alongside responses from Applicant's Design Team. The responses below should be read alongside the response letter from DOSA Consulting Engineers in Appendix A, and Section 5 of the submitted Architectural Design Statement, which responds to design items raised.

Fiona O' Sullivan, Area Planner

(a) Design and layout of scheme have been informed by S247 pre-planning consultations held during 2025

(b) The density and layout of the draft scheme are considered appropriate to the location of the site.

Response:

All comments noted and welcomed. The design has been progressed in close partnership working with Kerry County Council.

Brian O'Connor, Killarney Municipal District Engineer

(a) Previous on-site discussions in relation to surface water drainage were noted. Current proposal is to connect surface water drainage from the site to the west. KCC preference for discharge of surface water

from the site to the south. In response, Liam O' Toole, DOSA Consulting Engineers stated that the surface water from the site would be attenuated and discharge to the west was more feasible. Discharging surface water to the south may raise third party issues. Brian O' Connor and Liam O' Toole undertook to discuss the matter further.

(b) It was noted that a Traffic Assessment Report would be submitted with the planning application.

(c) Set back of roadside boundary fence and provision of cycle lanes along Countess Road to be considered. BOC to revert to applicant.

Response:

Further to the above, Liam O' Toole, DOSA Consulting Engineers met with Brian O'Connor to review and agree the surface water drainage strategy for the site. It is proposed to discharge to existing storm water network via Countess Grove estate with provision of new surface water infrastructure. From discussions with Council, we understand there are some issues in respect of drainage / functionality of the existing adjacent public open space in Countess Grove. The proposals will provide surface water management on the subject site that do not exist at present, and the new surface water proposals in Countess Grove provide an outlet, if needed, to connect that estate to the network. As set out in the DOSA Engineering Response (Appendix A) and submitted infrastructure reporting, a second stormwater outfall option also exists to the south, with provision made also for this in the design.

A full Traffic and Transport Assessment by MHL Consulting Engineers has been prepared and submitted with the application.

Further to discussions with Council, the proposed layout sets back the apartment blocks on Countess Road to allow for future provision of cycle lane on the southern side of the street, should the network be developed in the future. This will be retained as grassed areas in the interim. Refer to Section 5 of the submitted Architectural Design Statement.

Brendan Mulhern,

Development layout should provide for cycle and pedestrian permeability both north-south and east-west throughout the site.

Response:

Further to direction from the Council, the proposed site layout makes provision for potential future cycle and pedestrian connections as requested. It is noted that the final formation of connections to existing estates is subject to agreement from Kerry County Council.

Eoin Kelleher, Planer and Ecologist, Environmental Assessment Unit

(a) Proposal for the provision of nature-based solutions for surface water drainage is welcome. Ensure that proposals are fully incorporated into the design of the scheme.

(b) Proposals for protection of trees is welcome.

(c) Wastewater disposal – developer to ensure connection to public network feasible.

(d) Lesser Horseshoe Bat – Site is located in LHB Core Sustenance Zone. Detailed lighting proposal for the development should be submitted. Recommendations in Ecologist's Report in relation to provision of Dark Buffer Zones in Landscaping Layout should be implemented. Bat Derogation Licence may be required and, if so, licence should be submitted with the planning application.

Response:

All comments noted and welcomed.

The Applicant is in receipt of a confirmation of feasibility from Uisce Éireann, as submitted with the planning application which confirms a wastewater connection is feasible without infrastructure upgrade.

A Bat Survey report has been prepared by Greenleaf Ecology. A derogation licence was applied for and obtained as requested.

Conal Murphy, Environment Dept

(a) Draft CEMP is a thorough document.

(b) Development should be designed to minimise need to dispose of large quantities of soil and stone from the site. Estimate of quantity of material for disposal and its destination should be submitted with the planning application.

(c) Wheel wash facility should be installed during construction phase of the development.

Response:

The development has been designed to minimize cut and fill throughout the site, in keeping the proposed finish floor levels of the units and the proposed road levels as close to the existing ground levels as possible. The design of road levels and finished floor levels has been carried out in such a way as to minimize cut/fill type earthworks operations. The cut and fill analysis has been indicated on the Proposed Bulk Eart5hworks Drawing No. 7334-0045 and indicates a total site fill of approximately 10,000m³.

A wheel wash facility will be installed during construction phase of the development as indicated on the Proposed CEMP Layout included in the Appendices of the Construction & Environmental Management Plan (CEMP).

Anna Meria Costello, Housing Capital

(a) Draft Part V proposal to provide for grouping of social housing to the south of the site noted. Dispersed layout for social housing units would be preferred.

(b) High demand for one-bedroom and two-bedroom social housing units in Killarney.

(c) KCC are inviting developers to provide affordable housing.

Response:

The application is accompanied by a revised Part V proposal which responds to the Council's request, including a proposed dispersed approach to units.

Noel Cronin, A/Chief Fire Officer, Building Control

(a) Design of turning circles queried.

(b) Query raised regarding diameter of proposed water main.

Response:

As per the DOSA Consulting Engineers response, The swept path analysis for the development included a check on all of the proposed turning circles is as indicated on the AutoTrack Analysis.

It is proposed to provide a new 150mm (internal diameter) HDPE connection to the public watermain on the Countess Road with associated valves and metering requirements. Internally within the development it is proposed to have a series of 100mm Ø branches and loops with associated hydrants, valves and metering requirements.

All works will be in accordance with Uisce Éireann Code of Practice for Water Supply & the Water Infrastructure Standard Details Document Number: IW-CDS-5020-01.

Donal Murphy, Senior Executive Engineer, Housing Estates Unit

Queries raised in relation to the following matters:

(a) Location of boundary fence to rear of proposed creche.

(b) Widths of service roads should meet minimum standards.

(c) Taking In Charge Map should be submitted. KCC does not take apartments in charge.

(d) EV Charging points should be designated.

(e) Swept Path Analysis should be submitted for entrance to the development.

(f)Childproof fencing should be provided inside sod and stone boundary fences.

(g) KCC Risk Controller is opposed to provision of playground equipment.

(h) Layout of new public footpath and cycle lanes along Countess Road needs to be clarified. Pedestrian Crossing may be required on Countess Road.

(i) KCC is not in favour of provision of low-level public lighting bollards

Response:

- The proposed boundary treatment to the rear of the creche is clearly delineated within confirmed land ownership.
- The proposed road layout has been developed in accordance with the Design Manual for Urban Roads and Streets (DMURS, 2013), which is the prevailing national guidance for the design of urban streets and takes precedence over legacy standards in urban contexts. In accordance with Table 3.1 and Figure 3.3 Function and Movement of DMURS (2013), the roads within the proposed scheme are classified as Local Streets, which provide access within communities and connections to Arterial and Link Streets. These streets are therefore intended to serve low-speed residential environments with a focus on placemaking, safety, and multi-user accessibility. The street width design is in accordance with these standards.
- A Taking in Charge drawings has been prepared and submitted, as requested.
- The submitted application includes a dedicated EV charging layout by DK Partnership in full compliance with governing policy.
- The design has been subject to full swept path analysis, with safe access and egress demonstrated.
- All boundary treatments have been designed with safety and durability in mind.
- The designed public open space areas have been developed to prioritize natural play and cater for the needs of different resident cohorts in the operational development. It will deliver a high quality and safe environment for children and young people to play in.
- The layout of the new public pathway and cycle lanes to the north of the site along countess road was submitted to Kerry County Council ahead of formal submission of the subject planning application.

Michael Lynch, Planning Dept

Observations were made on behalf of KCC staff who were unable to attend the meeting as follows.

Eoghan O'Brien, Senior Executive Engineer

Dr Michael Connolly, County Archaeologist

Response:

It was confirmed that there is no flood risk on the site. The site is in Flood Zone C.

The County Archaeologist noted that a programme of archaeological testing was being progressed, subject to National Monuments Service license, the findings of which would inform final site layout at submission stage. This work has been completed in advance of submitting the application. No potential for adverse impacts on archaeological heritage has been identified.

04 //

Planning Assessment

This section of the Report will address the main land use policies and objectives which pertain to the application site, with a more detailed review of the National, Regional and Local Planning policies contained within the separate Statement of Consistency document. As evident from Kerry County Council's advice during pre-planning discussions, there are no objection in principle to the development of residential units on these lands. We consider that the proposed development is in accordance with the land use policies and objectives of the Kerry County Development Plan 2022-2028, the relevant statutory Development Plan for the area.

4.1 Principle of the Development

The proposed development aligns with the zoning objectives in place under the Kerry County Development Plan 2022-2028.

It is noted that the subject lands are largely zoned under 'R1 – New/Proposed Residential Phase 1' zoning in the newly adopted CDP, with a section of the site to the southwest being zoned 'R2 – Existing Residential' and an area to the north zoned under 'M4 – Built up area'. The objective for each of these is as follows:

> ***R1 – New / Proposed Residential Phase 1****: 'For new residential areas/town extensions to ensure the provision of high quality new residential environments. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities. May also include a range of other ancillary uses for residential, particularly those that have the potential to foster the development of new residential communities.'*
>
> ***R2 – Existing Residential****: 'For existing predominantly residential areas allowing for the protection of existing residential amenity balanced with new infill development. May also include a range of other ancillary uses for residential, particularly those that have the potential to foster the development of residential communities. These are uses that benefit from a close relationship to the immediate community, such as crèches, some schools and nursing homes. A limited range of other uses that support the overall residential function of the area may also be considered.'*
>
> ***M4 – Built up area****: 'Provides for a mix of land uses which may have existing buildings in place, brownfield lands and undeveloped greenfield lands within the development boundary.'*

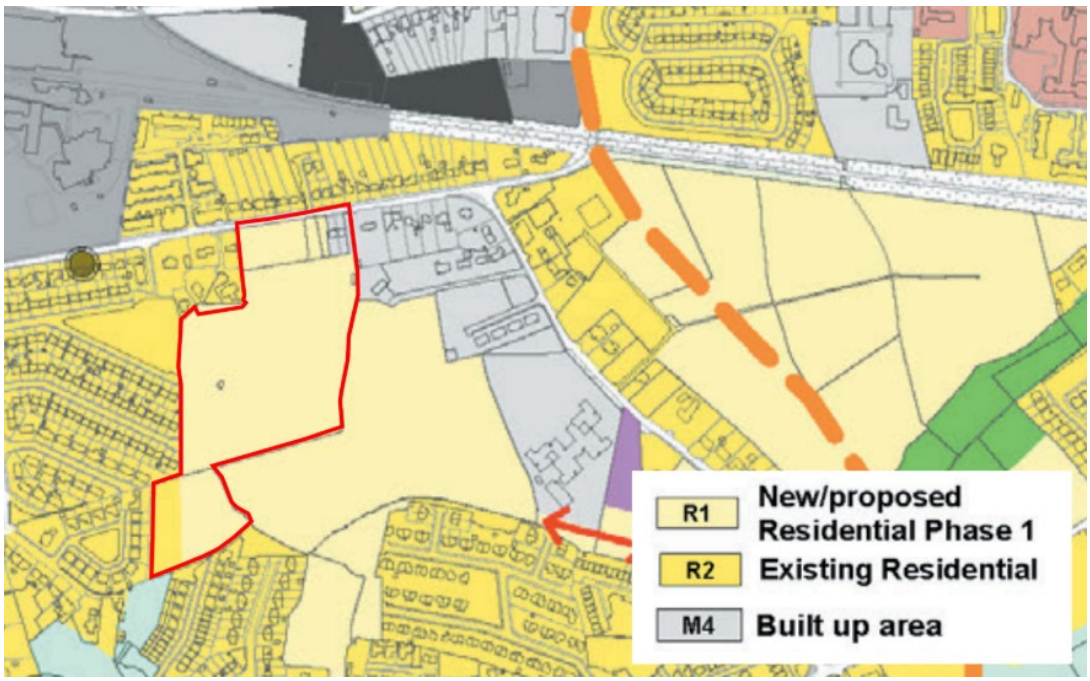


Figure 3-1: Site Zoning Context

During the Section 247 process with Kerry County Council, the council did not raise any concern with the principle of development on the subject lands and stated that the use of these lands for residential development would conform with the active land use zonings on the site.

4.2 Compact Development

On the 15th of January 2024, the Minister published the 'Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities 2024' (SRDCSG). As outlined below the proposed development is fully in line with the published Guidelines.

4.2.1 Net Site Area

The development site has an area of 6 hectares. The methodology for Net Site Area calculations set out in Appendix B of the SRDCSG indicates that the calculation should exclude lands for commercial and community services. Therefore, the area relating to the creche development has been removed. The resulting 'developable area' is 5.77 hectares.

4.2.2 Density

Based on the net site area of 5.77 hectares, the proposed 259 no. dwellings result in a proposed net density calculation of 45 dwellings per hectare (dph).

Table 3.5 - Areas and Density Ranges Key Towns and Large Towns (5,000+ population)[10]

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.
Key Town / Large Town - Suburban/Urban Extension Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).

Figure 3 2: Key Town Density Ranges - Extract from Table 3.5 2024 Guidelines

As outlined, Killarney is a 'Key Town' within County Kerry. Table 3.5 of the Guidelines (included here as Figure 3.3) sets out the density ranges for such locations, with the subject site meeting the definition of a 'Key Town/Large Town - Urban Neighbourhood. In accordance with the Guidelines, density ranges for developments in such areas should generally be between 40 dph to 100 dph (net) in such locations. The subject site falls within this category, albeit that it is c.750 m walk to the main street in Killarney

Figure 3.3 Accessibility Definitions - Extract from Table 3.8 2024 Guidelines

Table 3.8: Accessibility

High Capacity Public Transport Node or Interchange

- Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail[11], light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'[12] stop.
- Highest densities should be applied at the node or interchange and decrease with distance.
- 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.

Accessible Location

- Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.

Intermediate Location

- Lands within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; and
- Lands within 500 metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service.

Peripheral

- Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small and Medium Sized Towns and in Rural Towns and Villages.

The subject site is a sustainable site in many respects, located within the settlement boundary, However, it does not meet the criteria set out in Table 3.8 of the Guidelines for an accessible location or an intermediate location which focuses primarily on access to high frequency public transport requiring such sites to be within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services or within 500 metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service. This frequency of public transport service does not exist in Killarney.

The SRDCSG also states that in reviewing density appropriate consideration should be given to character, amenity and the natural environment of local area. The design response should be proportionate to the receiving context, considering existing scale and grain and the protection of residential amenities. In the case of the subject site, the design approach (and resulting proposed density of development) has been directly informed by a robust evaluation of site attributes, which includes respecting the scale and grain of existing adjoining residential areas, maintenance of existing natural features / hedgerows where possible, and incorporating appropriate offsets to existing properties.

We consider the proposed density of 45 dwellings per hectare is not only consistent with national and local objectives, but also compatible with the sites zoning objective, the existing and evolving settlement pattern of the area.

4.3 Access

The site benefits from good transport connections for a town in Kerry that will benefit the future residents of this site and the development. As demonstrated by the Connectivity Map included in Appendix A, the site is within 5-10min walking distance of the Killarney Town Centre that has extensive social and community services as well as key employment locations.

There is currently no bus service along Countess Road to the north of the site. However, the site is within general walking distance of Killarney Railway Station and Killarney Bus Station. As shown in **Table 1** below, Killarney Bus and Train stations provide multiple different route options for future residents of this development. Each of the below listed stops are located within 1.2km of the subject site and provide routes to different parts of County Kerry and to County Cork.

Table 1: List of Public Bus Stops and Services

Stop ID	Distance from site	Routes Available
Killarney Mission Road Bus Stop	850m	300, 722
Killarney Bus Station	1.2km	257, 271, 270, 279
Killarney Coach Bus	1.2km	Private Coach Stop
Killarney Train Station	1.1km	A308, A311

As can be seen from the above, the subject site is well serviced in regard of public transportation infrastructure. The nearest stop to the site on Mission Road is serviced by the local 300 and 722 bus route. Killarney Bus Station (c.1.2km) and Killarney Train Station (c.1.1km) are located in close proximity to the subject development and are within accessible distance of the proposed development. In this regard, the proposed development can be seen to have an adequate provision of local, regional and national transport services conveniently available.

4.4 Traffic

A Traffic & Transport Assessment (TTA) has been prepared by MHL & Associates Limited Consulting Engineers. The scope of the TTA assesses 6 no. junctions in the vicinity of the site, specifically:

- Junction 1 – Countess Road / Muckross Road 3-arm roundabout
- Junction 2 – Countess Road / Countess Grove Junction T-junction
- Junction 3 – Development Junction
- Junction 4 – Countess Road / Rookery Road T-junction
- Junction 5 – Countess Road / Park Road Roundabout
- Junction 6 – Woodlawn Road / Rookery Road T-junction



Figure 2.4: Junctions locations assessed as part of the TTA. (Source Figure 1.1 of TTA – MHL)

The TTA concludes that the assessed junctions are operating below capacity for all design years up to including the year 2042 for both the AM and PM peaks. The TTA states that factors such as proximity of the site to the town centre, the on-site creche, proximity to the local primary school, and the extensive proposals to provide dedicated pedestrian and cycling paths traversing the site, including the potential future pedestrian and cycle connections to adjoining lands will lead to an actual reduction in the conservative traffic figures presented in the report.

MHL & Associates Ltd Consulting Engineers have also prepared a Mobility Management Plan (MMP) for the subject development. The MMP states that the site is well situated for the implementation of an MMP promoting alternative modes of transport especially when accessing local services.



Figure 3.5: Extract from Architectural Design Statement prepared by Meitheal Architects

As shown above, the design of the site encourages permeability and connectivity to the adjoining lands and areas. The proposed site layout indicates a potential pedestrian connection and potential cycle connection/pedestrian connection to the adjoining Countess Grove Estate to the west of the proposed development. The adjoining lands to the east of the proposed development also includes connections for

both potential cycle connection/pedestrian connection. The MMP refers to the benefit of these future connections to allow for pedestrian and cycle movement through this site into the adjoining lands.

4.5 Visual Impact

A Landscape and Visual Impact Assessment has been prepared by Cunnane Stratton Reynolds has been submitted as part of this application pack. This analysis sets out the landscape and visual constraints and likely effects in relation to the proposed LRD Development at Countess Road. It also considers the potential development on the adjoining lands to the east. No potential for significant effects have been identified.

4.6 Ecology

4.6.1 Ecological Impact Assessment

An Ecological Impact Assessment (EcIA) has been prepared by Wetland Surveys, inclusive of dedicated bat survey and reporting by Greenleaf Ecology. Features within the site that are of potential use by foraging and commuting bats are hedgerows and treelines, which provide connectivity between the site and other foraging areas in the wider landscape. Overall, the site is considered to be of moderate to high suitability for foraging and commuting bats due to the presence of connectivity to other suitable habitats in the wider landscape. Results from bat surveys undertaken indicate that eight species of bat forage within the site. A relatively high amount of common pipistrelle, soprano pipistrelle and Leisler's bat activity was recorded and lower levels of activity from brown long-eared bat, Daubenton's bat, Natterer's bat, whiskered bat and lesser horseshoe bat were also recorded. Overall, the proposed site is considered to be of local conservation interest (higher value) for bats. Having regard to survey findings, it is proposed to utilise bat friendly lighting in the development. A derogation licence has been obtained for the demolition works on the basis of potential use of existing structures on the site.

As per the submitted EcIA, This project presents an opportunity to enhance the biodiversity value of the site. A series of enhancement measures have been incorporated into the landscape plan for the development (included with the planning application). The plan has been developed by Cunnane Stratton Reynolds with input from the ecology team. These measures include:

- Preference of native species in the overall planting design. There will be a loss of 38 existing trees in order to accommodate the development. However, A total of 190 new native trees proposed for the public areas of the, plus an additional 15 fruit trees (comprising two orchard areas). Twenty three additional native trees are also proposed for private gardens as part of the development.
- A total of 129 linear metres of hedgerow will be removed to facilitate development along Countess Road. Other short sections along the western and eastern boundary are being removed for access purposes. An additional 360 linear metres, of new native hedgerow is to be planted across the site as part of the development. Additional tree planting across the site will improve connectivity throughout the site and with surrounding landscape features.
- Hedgerows being planted will include a native mix of species that are suitable for the area.
- Ornamental planting will include a range of pollinator friendly species.
- A differential mowing regime will be promoted to enhance biodiversity
- Sustainable urban drainage systems (SUDS) will be intrinsically worked into the landscaped open spaces to provide visual interest, biodiversity and habitat services. The existing topography and suds friendly techniques such as permeable paving, raingardens and attenuation basins are incorporated into the landscape proposals for Countess Road LRD.
- Installation of swift bricks within the fabric of the buildings will provide nesting opportunities for this bird species of conservation concern

4.6.2 Appropriate Assessment

The application is also accompanied by an Appropriate Assessment Screening and Stage 2 Natura Impact Statement by Wetland Surveys. It has been determined that the proposed development may, in the

absence of mitigation measures, potentially lead to significant effects on the Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC.

Taking into account all matters discussed and provided that the mitigation measures and recommendations are adopted, it is objectively concluded that the proposed residential development at Countess Road, Killarney, Co. Kerry will not adversely affect the integrity and conservation status of the Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC in view of the conservation objectives for this site.

4.7 Archaeological and Cultural Heritage

A review of the National Monuments Service (NMS) records indicates that there are no recorded monuments on the subject site. The Kerry County Development Plan does not indicate that there are any Records of Protected Structures (RPS) on the site or in near proximiy to the site. The closest recorded monument in the vicinity to the residential development site is shown on the NMS Historic Viewer and is located 120 meters to the northwest of the redline of the subject site and is recorded as a 'Ritual Site – holy well' (Ref. KE066-071----). There is a second recorded monument located 166m to the south of the redline boundary which is recorded as a 'Ringfort – rath' (Ref. KE066-076--).

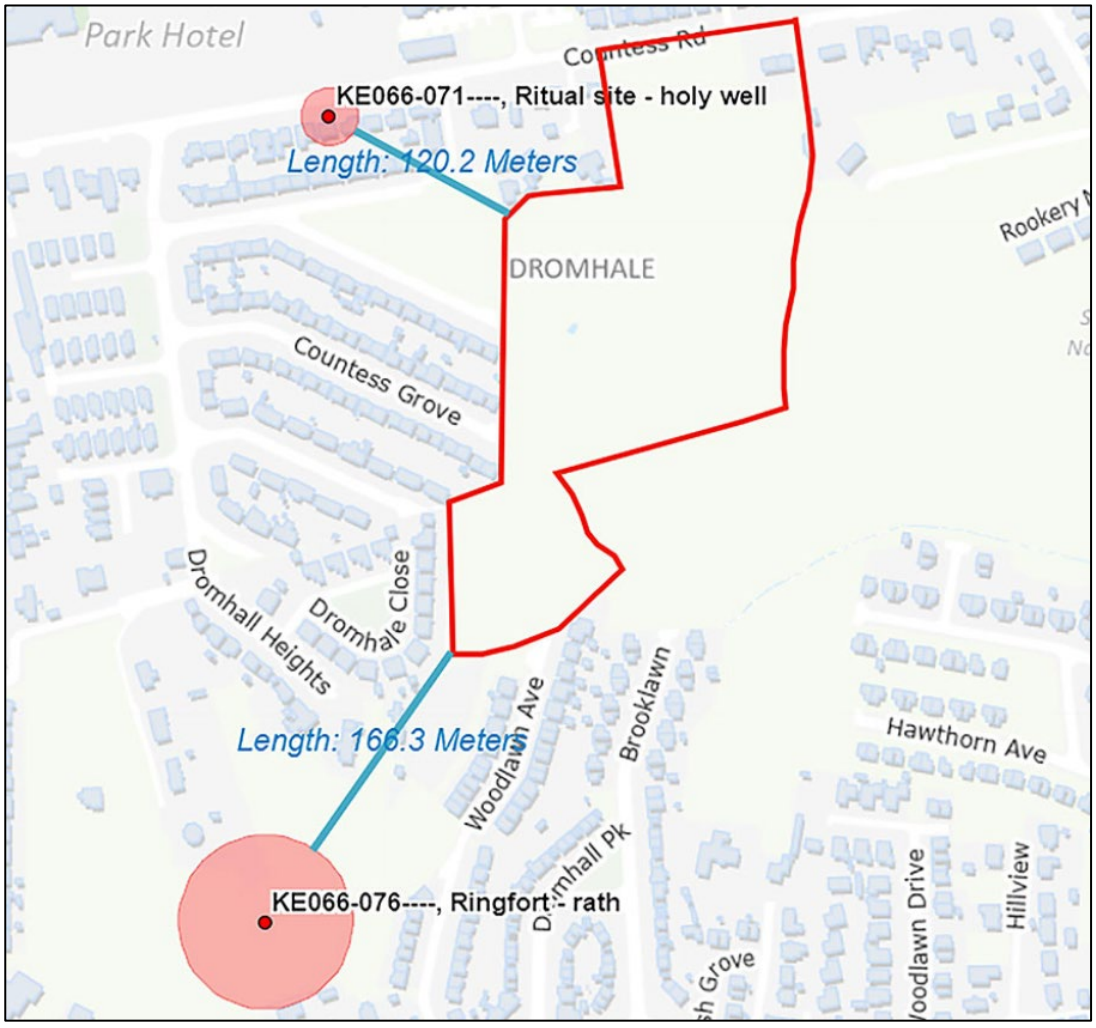


Figure 3.6: Location of two monuments recorded on the NMS with the subject site outlined in red. Source: Aegis Method Statement for archaeological test trenching at Dromhale townland, Killarney, Co. Kerry

Aegis Archaeology Limited have undertaken archaeological investigations, including a programme of test trenching for the development site. The approach was verbally agreed with the Kerry County Archaeologist, Dr. Michael Connolly, prior to the license application being made.

A fulacht fiadh/burnt mound was identified as part of the test trenching. It is recommended that this feature be preserved by record. An area approximately 40m by 40m should be opened around the

archaeological features, in order to ascertain the extent of the burnt spreads and their relationship to the fulacht fiadh.

4.8 Environmental Impact Assessment

Article 93 and Schedule 5 of the 2001 Planning and Development Regulations set out the classes of development for which a planning application must be accompanied by an Environmental Impact Assessment Report (EIAR).

Part 1 and Part 2 Schedule 5 of the Planning and Development Regulations, 2001 defines the categories and thresholds of developments requiring EIA. The subject proposal does not come under any of the stipulated categories contained in Part 1.

The proposed development for residential housing, a creche and ancillary works falls within the category of an 'Infrastructure Project' under Schedule 5 (10) (b) of the Planning and Development Regulations, which provides that a mandatory EIAR must be carried out for the following projects:

"b)

(i) Construction of more than 500 dwellings

(ii) Construction of a car-park providing more than 400 spaces, other than a car-park provided as part of, and incidental to the primary purpose of, a development.

(iii) Construction of a shopping centre with a gross floor space exceeding 10,000 square metres.

(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

(In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use.)"

The proposed development does not trigger a requirement for mandatory EIA because:

- With a development site area of 6 ha, of which 5.77ha is defined as a net developable area, the subject site is below the threshold that would trigger a mandatory EIA. The total red-line boundary is 6.44 ha also well below urban the development area based threshold.
- At 259 the number of individual residential units falls below the threshold of 500 dwellings.

Schedule 7 of the Regulations details the criteria the planning authority must consider in determining whether a sub-threshold EIA should be undertaken. This schedule is a direct transposition of Annex III of EU Directive 2011/92/EU. EU Directive 2014/52/EU provides a revised Annex III and its transposition into national legislation is mandatory.

Having reviewed these criteria in the context of the proposed development, it is considered that a sub-threshold EIA is not required for the proposed development, as adequate measures will be put in place to avoid, reduce or mitigate likely impacts, such that neither the construction nor operational phase of the overall development will have a significant negative impact on the environment. A full EIA Screening Statement is submitted with the application.

05 //

Conclusions

The proposed development represents a natural and positive evolution of an important greenfield development site within the settlement footprint of the Key Town of Killarney. The principle of developing the site for residential use is supported by land use zoning in the Killarney Town Development Plan (Volume 2 of the Kerry County Development Plan 2022) as well as other key policy objectives. The project will also deliver directly on key objectives contained in the National Planning Framework including the express need to create a more compact urban form in our key towns to ensure they can compete and be drivers of regional growth, investment and prosperity. The development has taken account of the Section 247 and 32B Opinion meetings that has been held with Kerry County Council and has incorporated the feedback from these meetings into the approach and design of the development.

The design of the proposed development has been advanced in positive partnership with Kerry County Council. Important planning consensus has been established in respect of the layout and general scale of development. The subject site has the potential to be a highly sustainable location which can deliver positive modal shift away from the private car in Killarney. The delivery of pedestrian and cycle infrastructure as part of this scheme and the proposed connections to the adjoining existing residential estates and proposed developments will be of considerable benefit to the wider area. The design of the proposal fully respects existing context which has been advanced on the basis of sound, well considered best-practice architectural principles. It has been demonstrated that the proposed development will not give rise to any adverse impacts on adjoining properties in respect of overlooking or overshadowing.

06 // Appendix A:

Opinion Response by DOSA Consulting Engineers

DENIS O'SULLIVAN & ASSOCIATES
CONSULTING ENGINEERS

27 April 2026
Our Ref. 7334/SOG

HW Planning
5 Joyce House
Barrack Square,
Ballincollig,
Co. Cork
P31KP84

Re: LRD Final Opinion Report, Countess Road, Killarney, Co Kerry

Dear Luke

I have listed below the draft engineering response to the Written Opinion issued by Kerry County Council for the above.

2.a ***Drainage***

Previous on-site discussions in relation to surface water drainage were noted. Current proposal is to connect surface water drainage from the site to the west. KCC preference for discharge of surface water from the site to the south. In response, Liam O' Toole, DOSA Consulting Engineers stated that the surface water from the site would be attenuated and discharge to the west was more feasible. Discharging surface water to the south would raise third party issues. Brian O' Connor and Liam O' Toole undertook to discuss the matter further.

Response

The runoff from the entire developed site will discharge to the existing Kerry County Council public stormwater network on the Countess Road via the existing Countess Grove estate. There is a synergy in discharging to this stormwater network as it follows the same route as the proposed gravity foul discharge route. During meetings and discussions with council they have expressed their concerns regarding the useability of the existing green area in Countess Grove due to waterlogging. This discharge pipe provides an outfall connection point for the possibility of subsurface drainage works to the green area if desired by the council at a future date. This stormwater outfall is indicated on the Proposed Stormwater & Foul Sewer Layout - Option 1 (1-3) Drawing No.'s 7334-0020, 7334-0021 & 7334-0022.

A second stormwater outfall option has also been indicated. here is an existing stormwater network that traverses the site and discharges stormwater from a low point on the site. Investigation works carried out on site indicate that this pipe is 600mm in diameter. The system has been designed so that it would be possible to

ENGINEERING SOLUTIONS

discharge the runoff from the entire developed site to this existing network that currently traverses the site and discharges south to the River Flesk. This route is through adjoining lands, adjoining estates via the rear gardens of the Doire Coile and Brooklawn estate to the south. This stormwater outfall is indicated on the Proposed Stormwater & Foul Sewer Layout - Option 2 (1-3) Drawing No.'s 7334-0090, 7334-0091 & 7334-0092.

4.c ***Drainage***

Wastewater disposal – developer to ensure connection to public network feasible.

Response

A Pre-Connection Enquiry was submitted to Uisce Éireann. The Uisce Éireann Reference Number for this enquiry is CDS25001852. The Confirmation of Feasibility document is included in Appendix A of this Report. This confirmed that, subject to a valid connection agreement being put in place, the proposed connection to the Uisce Éireann network could be facilitated and that it was feasible without infrastructure upgrade by Uisce Eireann.

5.b ***Environment***

Development should be designed to minimise need to dispose of large quantities of soil and stone from the site. Estimate of quantity of material for disposal and its destination should be submitted with the planning application.

Response

The development has been designed to minimize cut and fill throughout the site, in keeping the proposed finish floor levels of the units and the proposed road levels as close to the existing ground levels as possible. The design of road levels and finished floor levels has been carried out in such a way as to minimize cut/fill type earthworks operations. The curt and fill analysis has been indicated on the Proposed Bulk Eart5hworks Drawing No. 7334-0045 and indicates a total site fill of approximately 10,000m^3.

5.c ***Environment***

Wheel wash facility should be installed during construction phase of the development.

Response

A wheel wash facility will be installed during construction phase of the development as indicated on the Proposed CEMP Layout included in the Appendices of the Construction & Environmental Management Plan (CEMP).

7.a ***Roads / Fire Safety***

Turning circle design queried.

Response

The swept path analysis for the development included a check on all of the proposed turning circles is as indicated on the AutoTrack Analysis – Refuse Truck Drawing No. 7334-0050 & AutoTrack Analysis – Fire Tender Drawing No. 7334-0051.

7.b ***Fire Safety / Services***

Water main diameter queried.

Response

It is proposed to provide a new 150mm (internal diameter) HDPE connection to the public watermain on the Countess Road with associated valves and metering requirements. Internally within the development it is proposed to have a series of 100mm Ø branches and loops with associated hydrants, valves and metering requirements.

All works will be in accordance with Uisce Éireann Code of Practice for Water Supply & the Water Infrastructure Standard Details Document Number: IW-CDS-5020-01.

8.b ***Roads***

Widths of service roads should meet minimum standards.

Response

The layout of roads and streets are designed to ensure that the design speed within the estate is a maximum 30kph with home-zones and local access areas designed to 15kph. Road cross sections proposed range from 5.5m on the main spine road to 5.5-5.0m on local access roads. Traffic calming is achieved by limiting forward visibility through chicanes, landscaping and on-street parking as well as raised colour contrasted platforms. The use of signage, tighter corner radii (3-5m radius), frequent pedestrian crossings and multiple junctions within the scheme achieve a self-regulating environment for all road users.

8.e ***Transport***

Swept Path Analysis should be submitted for entrance to the development.

Response

The swept path analysis for the entrance to the development is indicated on the AutoTrack Analysis – Refuse Truck Drawing No. 7334-0050 & AutoTrack Analysis – Fire Tender Drawing No. 7334-0051.

8.h *Transport*

Layout of new public footpath and cycle lanes along Countess Road needs to be clarified. Pedestrian Crossing may be required on Countess Road.

Response

The layout of the new footpath and allowance of a 3m grass margin to facilitate potential future active travel infrastructure is indicated on the Meitheal Architects Proposed Site Layout Plan. This includes the details of the proposed crossing point on Countess Road.

A.4a *Roads / Fire Safety*

Road widths or radii – road dimensions or radii are NOT shown on various "Proposed Site Layout" (not fully assessed). The roadway width should be 6m except for culs-de-sac less than 60m long, where a width of 5.5m should be acceptable. A reduced roadway width may be approved for short spur. cul-de-sac.

Response

The layout of roads and streets are designed to ensure that the design speed within the estate is a maximum 30kph with home-zones and local access areas designed to 15kph. Road cross sections proposed range from 5.5m on the main spine road to 5.5-5.0m on local access roads. Traffic calming is achieved by limiting forward visibility through chicanes, landscaping and on-street parking as well as raised colour contrasted platforms. The use of signage, tighter corner radii (3-5m radius), frequent pedestrian crossings and multiple junctions within the scheme achieve a self-regulating environment for all road users.

A.4c *Fire Safety / Transport*

If carrying out any swept path analysis vis Autotrack or similar – Fire Appliance/Vehicle in all counties is purchased off National Agreed Framework – Volvo/Scania Chassis - the dimensions are approx. 9m long with 4.8m between axles and 3.0m wide between Wing Mirrors – smaller in length than a bin/waste lorry. Current LRD model is 3.81m between Axial - incorrect.

Response

The swept path analysis for the development is as indicated on the AutoTrack Analysis – Refuse Truck Drawing No. 7334-0050 & AutoTrack Analysis – Fire Tender Drawing No. 7334-0051. The proposed analysis has been indicated using a dimension of approx. 9m long with 4.8m between axles and 3.0m wide between Wing Mirrors.

A.5 *Water Supply / Fire Safety*

Irish Water / Uisce E.- Design-Risk-Assessment-Code-of-Practice-for-Water 3.5.15 The minimum pipe size shall be 100mm internal diameter in housing Developments of 40 houses and up to 100 houses. Developments of 100 houses and above shall have minimum pipe sizes of 150mm internal diameter spine Main with 100mm branch Mains. Hydrants - This requirement should not take account of dead-end or wash-out hydrants which are used for operational flushing. A hydrant shall not be closer than 6m to a property; BCA note – the proposed spine main of 150mm diameter new watermain ends after 140m into new development and reduces to 100mm diameter. This appears not in line with IW code of practice. A discussion/review with Irish Water is advisable.

Response

It is proposed to provide a new 150mm (internal diameter) HDPE connection to the public watermain on the Countess Road with associated valves and metering requirements. Internally within the development it is proposed to have a series of 100mm Ø branches and loops with associated hydrants, valves and metering requirements.

All works will be in accordance with Uisce Éireann Code of Practice for Water Supply & the Water Infrastructure Standard Details Document Number: IW-CDS-5020-01.

Design of both the foul and water networks has been submitted to Irish Water prior to lodgement and a "Statement of Design Acceptance" has been obtained. A copy of the letter is attached in Appendix B of the Infrastructure Report.

A.10a Fire Safety

Hydrant Locations - A check is required to confirm Hydrant locations.

Response

All works will be in accordance with Uisce Éireann Code of Practice for Water Supply & the Water Infrastructure Standard Details Document Number: IW-CDS-5020-01. The fire hydrants have been checked to ensure compliance with Technical Guidance Document B (TGD B).

A.10b Fire Safety / Roads

Turning bays — check against TGD-B Tables 24 & 25 and Site Dev Works recommendations.

Response

The swept path analysis for the development included a check on all of the proposed turning circles is as indicated on the AutoTrack Analysis – Refuse Truck Drawing No. 7334-0050 & AutoTrack Analysis – Fire Tender Drawing No. 7334-0051.

A.11a ***Drainage / TIC***

Bio Retention Pod / Attenuation tank/s & Hydro brake/s – who maintains the Silt traps both upstream and downstream of the tank / Pond ? (Debris Monthly & Silt Every 6 months) (Take in charge item). 5 number attenuation tanks > 2000m3 capacity.

Response

The proposed maintenance regime for the SuDS devices including the underground attenuation system is included in Section 5 of the Drainage Impact Assessment.

A.11b ***Drainage / TIC***

Klargester Bypass Separator/s – who maintains separator – (Oil Levels – 3 months or as per Alarm activation). (Take in charge item) – is one provided.

Response

The proposed maintenance regime for the SuDS devices including the bypass separator is included in Section 5 of the Drainage Impact Assessment. It is not proposed to have an alarm in the bypass separator.

A.11c ***Drainage / Structural***

Attenuation Tanks - what is the loading ability here? Regards a car or vehicle parking.

Response

The proposed attenuation tanks will be located in green areas but will be designed to cater for a surcharge loading up to 10 kn/m2 to cater for car loading as required.

B.1 ***Flooding***

The proposed development is in Flood Zone C as defined in the Flood Risk Management Guidelines and is suitable for residential development in terms of the flooding guidelines.

Response

This is noted and correct.

B.2 ***Flooding***

The development as proposed is not predicted to result in an adverse impact to the existing hydrological regime of the area or increase flood risk elsewhere

Response

This is noted and correct.

B.3 ***Drainage / Flooding***

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. Poor operational management and maintenance of this system over its design life will significantly compromise the viability and capacity of the system.

Response

The storm water network and attenuation tanks are designed to accommodate the 100-year return period plus an additional 20% to account for the effects of climate change. The proposed maintenance regime for the SuDS devices is included in Section 5 of the Drainage Impact Assessment.

B.4 ***Drainage***

The principle of what is being proposed for the drainage network and SuDS would appear to be compliant with industry standards but will be subject to a detailed review at planning stage.

Response

This is noted.

B.5 ***Drainage***

The applicant is proposing to discharge attenuated storm flows at greenfield rates to the existing public storm network via a 400mm storm pipe in Countess Grove estate. The applicant will need to confirm the capacity of the existing storm network to accommodate the combined attenuated surface water runoff from the site.

Response

Stormwater discharge to the piped network is restricted over and above that of greenfield rates. (i.e. less stormwater discharged than at present from the site. This is a result of sizing the attenuation to that of predevelopment greenfield rate and ignoring the added benefit of the nature-based drainage solutions provided – permeable paving, green/blue roofs & infiltration methods.

Yours sincerely,

Stephen O' Grady

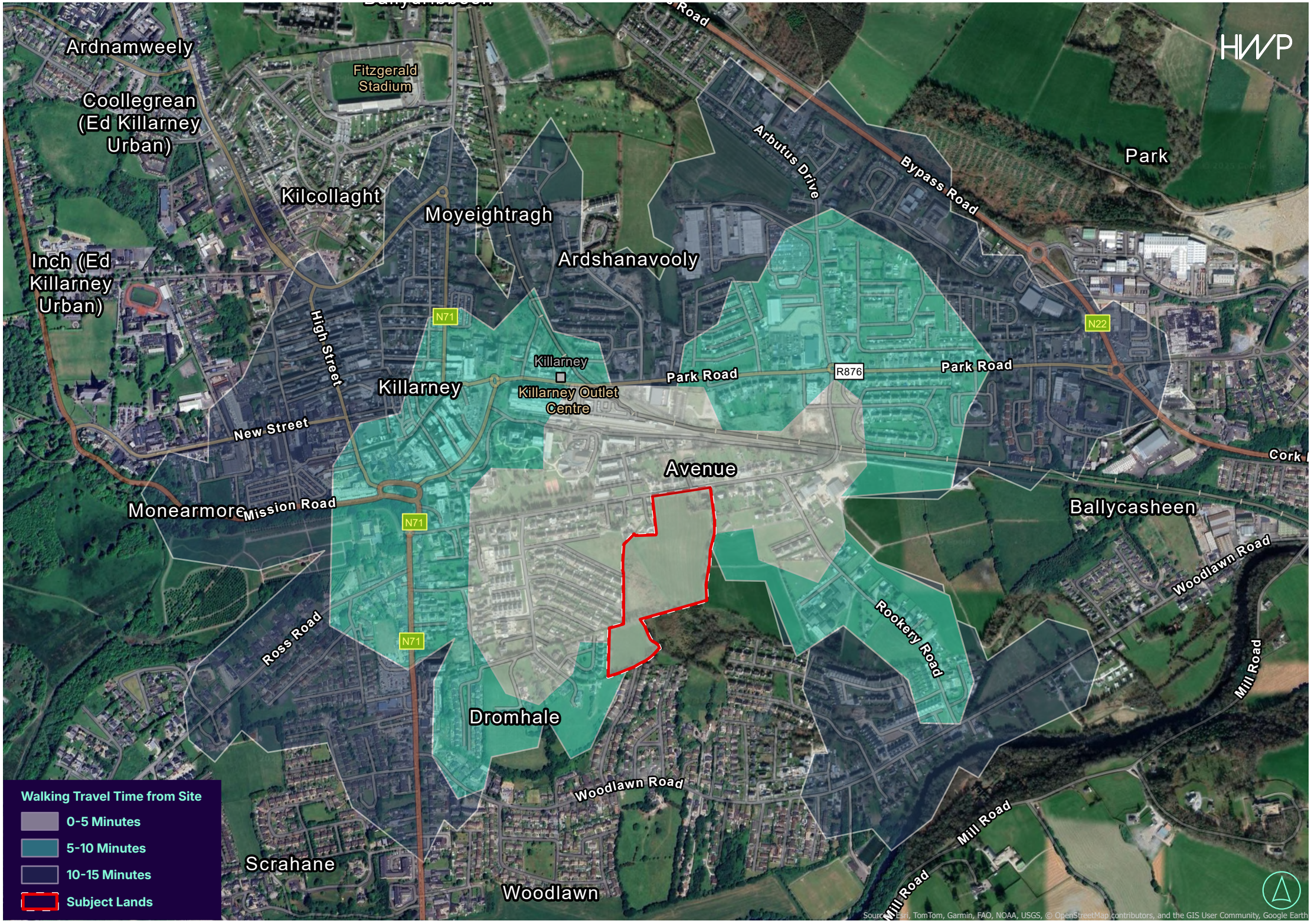
Stephen O' Grady, B.Eng, CEng, MIEI

On behalf of Denis O'Sullivan & Associates

Denis O'Sullivan & Company Limited trading as Denis O'Sullivan & Associates
Joyce House, Barrack Square, Ballincollig, Co. Cork T 021 4871781 info@dosa.ie www.dosa.ie

07 // Appendix B:

Connectivity Map by HW Planning


Ardnamweely
Fitzgerald Stadium
Coollegrean (Ed Killarney Urban)
Kilcollaght
Moyeightragh
Ardshanavooly
Inch (Ed Killarney Urban)
High Street
N71
Killarney
Killarney Outlet Centre
Park Road
R876
Park Road
N22
Arbutus Drive
Bypass Road
Park
New Street
Avenue
Monearmore
Mission Road
N71
Ballycasheen
Woodlawn Road
Ross Road
Rookery Road
Mill Road
N71
Dromhale
Woodlawn Road
Mill Road
Scrahane
Woodlawn
Mill Road
Walking Travel Time from Site
0-5 Minutes
5-10 Minutes
10-15 Minutes
Subject Lands
HWP
Source: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Google Earth

HW Planning
5 Joyce House,
Barrack Square,
Ballincollig,
Cork
P31 KP84

www.hwplanning.ie
info@hwplanning.ie +353
(0)21 487 3250

Directors:
Harold Walsh
Conor Frehill

Company Reg. No. 486211

Accreditations
ISO 9001:2015
ISO 14001:2015
ISO 45001:2018