



Statement of Consistency

Proposed Large-scale Residential Development at Pat
Scarteen Road, Killowen, (townland), Kenmare, Co. Kerry.

Client: KPH Construction

August 2026

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Introduction

1.1 Purpose of Statement

This statement of consistency has been prepared in accordance with the provisions of the Planning and Development Acts and accompanies a Large-scale Residential Development (LRD) application. The statement demonstrates that the proposed development is consistent with the relevant National, Regional and Local policies as pertaining to the proposed development.

The proposed development will provide for the construction of 100 no. residential units and all ancillary site development works at a site off Pat Scarteen Road, Killowen, (townlands), Kenmare, Co. Kerry.

This statement is intended to be clear and concise in its demonstration that the proposed development is consistent with these policies. A summary of the relevant policy from each publication has been provided in tabular format with associated comments on how the proposed scheme is consistent with same.

1.1.1 Site Location and Context

The subject site is c. 2.63 hectares in area, of which 2.53 hectares is developable land. The site is c. 400m to the east of Kenmare Town Centre, and adjacent to the mature residential developments of Cill Muire, Oakwood Manor and Scarteen Park, with a number of retail premises and other services and amenities in the vicinity.

1.1.2 Proposed Development

The proposed Large-Scale Residential Development will consist of the construction of 100 no. residential units, landscaping and associated site development works.

The proposed development includes the demolition of 2 no. existing single-storey sheds and the construction of 100 no. residential units comprising 30 no. 1-bed units; 30 no. 2-bed units; and 40 no. 3-bed houses, with ancillary landscaping and associated site development works. The development makes provision for 40 no. two-storey houses, comprising 36 no. semi-detached 3 bed units and 4 no. 3 bed mid-terraced units and 60 no. own-door maisonette/apartment units over 2 no. storeys (30 no. 1 bed units, 30 no. 2 bed units).

Vehicular access to the development will be via an upgraded and relocated entrance off the Pat Scarteen Road, with proposed upgrades including amendments to the existing shared pedestrian/cycle path and modifications to the signing and lining on the public road. The proposed development also provides for separate pedestrian/cycle entrances off Pat Scarteen Road and includes dedicated pedestrian and cycling paths traversing the site.

Ancillary infrastructure development works will include wastewater infrastructure, a pumping station, surface water attenuation, water utility services, public lighting, bin stores, bicycle stores, ESB substations, landscaping and all associated site development works.

National Policy

1.1 Delivering Homes, Building Communities 2025-2030

The Action Plan on housing supply and targeting homelessness targets the construction of 300,000 homes, including 72,000 social homes and 90,000 affordable housing supports by 2030. Building on the progress of Housing for All, this plan will see the State take a bigger role while also encouraging the private sector to play a key part in delivery. To accelerate progress, the plan includes regulatory reforms, tax incentives, and the largest ever investment in infrastructure in the history of the State - €275 billion over ten years through the National Development Plan.

Policy	Consistency of scheme
The Action Plan aims to address the current shortage and affordability of residential accommodation across the county by delivering: Increased supply of new housing, by delivering 300,000 units by 2030 72,000 social homes to be made available by 2030 for purchase or for rent by Local Authorities, AHBs, the LDA and via a strategic partnership between the State and retail banks. 90,000 affordable homes to be delivered for individual purchase under the Affordable Purchase Scheme. The Action Plan encompasses two pillars: Activating Supply and Supporting People.	The proposed development will contribute an additional 100 no. housing units to the existing housing stock in the Regional Town of Kenmare. Part V of the development act would require 20% of the development to be set out for affordable or cost rental housing; in this case that would represent the creation of 20 no. Part V units included in the proposed development. Further details are included in the submitted Part V proposal prepared by HW Planning and the Part V drawing prepared by Meitheal Architects.
The Government aims to deliver more than 90,000 social homes to 2030. The focus of the social housing programme will be to increase the number of new-build homes, with a target to reach delivery of more than 9,500 new-build homes on average each year for the next five years to 2026.	The proposed development will positively contribute to housing delivery targets set out in the Action Plan which seeks to provide a significant increase in the output of all forms of housing, and particularly social and affordable accommodation delivered by Local Authorities.

2.1 Climate Action Plan 2025 (CAP25)

This is the fourth statutory update to the plan since the Climate Action and Low Carbon Development (Amendment) Act 2021 was signed into law, committing Ireland to 2030 and 2050 targets for reducing greenhouse gas (GHG) emissions, and introducing 5-year carbon budgets and sectoral emission ceilings.

Policy	Consistency of scheme
CAP25 recognises that operational emissions in the built environment sector have decreased by 21% since 2018. The residential building sector is on track to meet its 2025 sectoral emissions ceiling. This follows on from CAP24 which set out that all new dwellings are to be designed and constructed to NZEB standard. That heat pumps are to be installed in 45,000 existing and 170,000 new dwellings by 2025, up to 400,000 existing and 280,000 new dwellings by 2030. CAP25 sets out the following further actions which aim to improve energy efficiency, reduce carbon emissions, and support Ireland's climate targets: Legislative Alignment: Actions to support the Energy Performance of Buildings Directive and district heating policy. Carbon Reduction: Methodologies and structures to be developed to reduce embodied carbon in new construction. Renovation & Retrofitting: A national building renovation plan and retrofitting programs for social housing to be developed (targeting BER B2 rating and heat pumps). Public Sector Leadership: Continued implementation of a roadmap for decarbonizing public sector buildings by 2030. Training Expansion: New micro-qualifications needed to support the scale-up of NZEB and retrofit skills. Boiler Phase-Out: A roadmap will be introduced to phase out fossil fuel boilers. Energy Upgrades: Residential and community energy upgrades through SEAI to continue.	A Climate Action and Energy Analysis Report has been prepared by DK Partnership for the application that sets out the measures proposed to ensure the construction and operational phases of the development are in line with the CAP24 and CAP25 objectives.

2.2 Project Ireland 2040: National Planning Framework (2018, with First Revision published April 2025)

The National Planning Framework (NPF) outlines the policies and objectives for the development of Ireland up to 2040 given the expected population growth. In the 2018 Framework, the population target for 2040 was 5.7 million which has been revised upwards in the 2025 First Revision to 6.1 million people. The 2025 Framework considers this growth will translate into an annual requirement for 50,000 additional homes to 2040. The Framework is underpinned by a number of strategic outcomes including compact growth, sustainable mobility and the transition to a low carbon and climate resilient society. The purpose of the NPF is to create the conditions to successfully accommodate growth and change, by facilitating a shift towards Ireland's regions and cities other than Dublin, while also recognising Dublin's ongoing key role.

Policy	Consistency of Scheme
Kenmare falls within the Southern Region where growth between 2022 and 2040 of 330,00 people is envisaged. The NPF Implementation: Housing Growth Requirements 2025 indicate a need for revised annual growth figures in County Kerry from 690 units per year to 1,167 units between 2025 and 2034 and 862 units from 2035 to 2040. National Policy Objective 7 - Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth. National Policy Objective 10 - Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth. National Policy Objective 11 - Planned growth at a settlement level shall be determined at development plan-making stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment. National Policy Objective 12 - Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and	The proposed development will contribute towards the delivery of the NPF Implementation requirement for increased annual housing growth in County Kerry. It is consistent with all strategic aims and objectives within the NPF. - The proposed development is located on lands zoned for 'R1 – New /Proposed Residential' use. - The proposed development is of high-quality design accessible to a range of retail premises, medial services and community facilities in the area. - Objective 43 of the NPF emphasises the importance of providing homes in locations that can support sustainable development. The subject land is zoned for residential development. The proposal will contribute directly to a positive increase in residential density in the area, while appropriately respecting the developing built environment. - The development of this zoned site will contribute directly to the realisation of compact growth and by delivering upon the Kenmare Zoning Map 'Indicative Walkway' objective through the site , promote sustainable mobility into Kenmare Town Centre. - The proposed development of this site will contribute towards the achievement of compact growth in Kenmare, at a

integrated communities that enjoy a high quality of life and well-being.

National Policy Objective 20 - In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 42 - To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.

National Policy Objective 43 - To prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

National Policy Objective 45 - Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights and more compact forms of development.

The plan also outlines 10 national strategic outcomes which include

- Compact Growth
- Strengthen Rural Economies and Communities
- Sustainable Mobility
- Enhanced Amenity and Heritage
- Access to Quality Childcare, Education and Health Service

sustainable location in proximity to the town centre, amenities and education and health facilities.

2.3 Draft CycleConnects 2022

In November 2022, the National Transport Authority published a Draft CycleConnects - Cycle Network Plan for Ireland which aims to improve sustainable travel in key cities, towns and villages in each county by providing the potential for more trips on a safe, accessible and convenient cycling network, connecting more people to more places. As indicated in Figure 01 – the proposed Inter-Urban Cycle Network runs along the R569 (Killowen Road) to the south of the subject site, connecting it with the town centre.

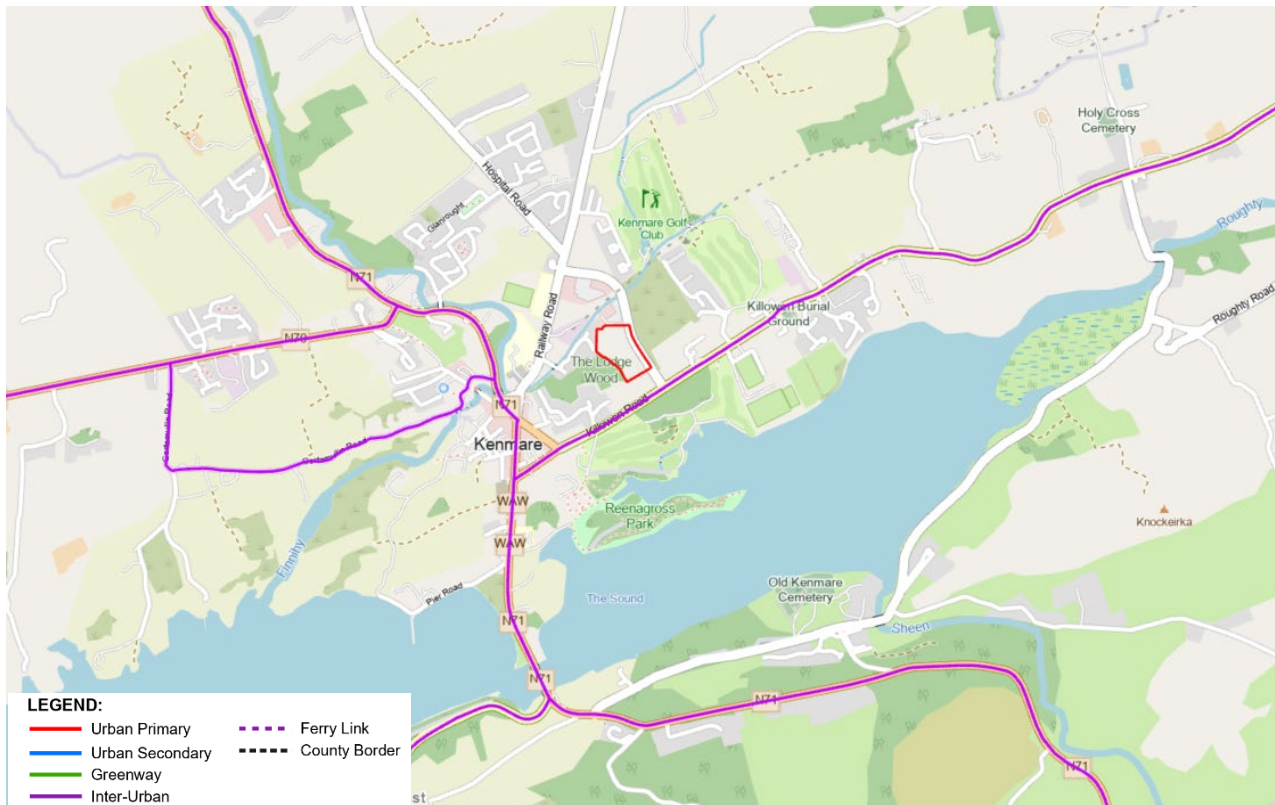


Figure 1. Draft CycleConnect Network for County Kerry

Furthermore, the subject proposal includes the provision of pedestrian and cycle connections through the site and to adjacent Lodge Woods and onto the town centre.

S.28 Ministerial Guidelines & Urban Design Manual

3.1 Sustainable and Compact Settlements–Guidelines for Planning Authorities 2024

This section provides an outline of what we consider to be the relevant Guidelines issued by the Minister in accordance with Section 28 of the Planning and Development Act 2000 (as amended).

Section 28(1)(c) of the Act specifies that these guidelines:

“may contain specific planning policy requirements that, notwithstanding subsection (1), are required to be applied by planning authorities and the Board in the performance of their functions.”

The Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published in 2009. They set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on residential development and the creation of sustainable and compact settlements. They expand on the higher-level policies of the NPF, in relation to the creation of settlements that are compact, attractive, liveable and well designed, with a focus on renewal of settlements and on the interface on between residential density, housing standards and placemaking to support the sustainable and compact growth of settlements.

Policy	Consistency of Scheme
Table 3.6 Areas and Density Ranges Small- Medium Towns (1,500 - 5,000+ population) Small- Medium Town – Edge <i>The edge of small to medium sized towns are the lower density housing areas constructed around the centre, while urban extension refers to greenfield lands at the edge of the built-up area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that densities in the range 25 dph to 40 dph (net) shall generally be applied at the edge of small to medium sized towns.</i> Table 3.8 Accessibility Accessible Location	Kenmare is designated a Regional Town in the Kerry County Development Plan 2022 – 2028 (CDP), with a 2022 population of 2,566 residents. This equates to a Small- Medium Towns (1,500 - 5,000+ population) in the residential density guidance set out in Table 3.6 of the 2024 Sustainable Residential Development and Compact Settlements Guidelines (CSGs). The character of the subject lands aligns with the 'Edge' category set out in Table 3.6, located c. 400m to the east of Kenmare Town Centre, In line with Figure 3.3 of the Guidelines density assessment must also consider local character, amenity and environmental sensitivities. The

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 500-1000 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.

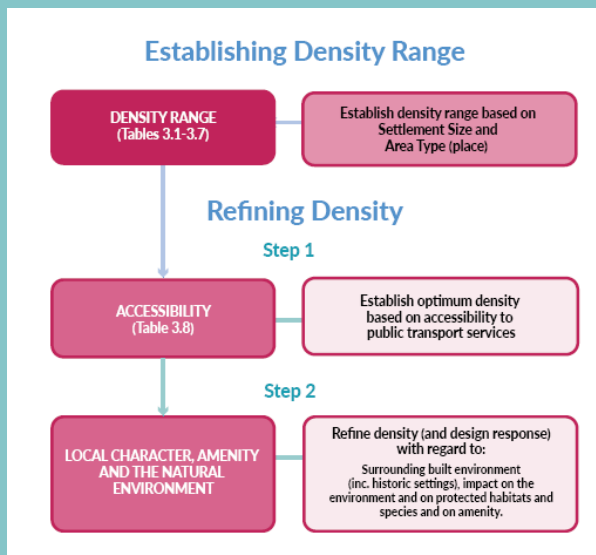


Figure 3.3 The Process for Establishing and refining appropriate density

proposed scheme responds proportionately to the existing and emerging residential context. There is an Aldi Store immediately adjacent to the north of the subject site and the mature residential developments of Cill Muire, Oakwood Manor and Scarteen Park are in the close proximity to the north, north-east and west respectively. Kenmare Shopping Centre including a Lidl and Supervalu store and medical centre is located c. 250m further north along Pat Scarteen Road. This includes Kenmare Playground. There is a primary and a secondary school nearby on Railway Road. n. The layout and scale align with the evolving urban character of Ballycasheen while safeguarding residential amenity.

The developable area of the site is 2.53 hectares, resulting in a net density of 39.5 dph from 100 dwellings. This sits within the 25 dph to 40 dph (net) range identified for Small-Medium Town – Edge developments.

The proposed mix reflects market demand for family housing, addresses viability concerns associated with higher apartment provision, and delivers deliverable, high-quality housing at a density that balances policy compliance, character, and market realities.

SPPR 1 - Separation Distances

It is a specific planning policy requirement of these Guidelines that statutory Development Plans shall not include objective(s) in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and

In line with the Sustainable and Compact Settlements Guidelines for Planning Authorities 2024, all units achieve minimum or above separation distances.

Furthermore, the Guidelines note that the requirement for separation distances has to an extent been made redundant by computer-based design programmes to model outcomes in relation to sunlight, daylight and privacy. A Daylight and Sunlight Analysis Report accompanies the application which

apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.

demonstrates compliance with the minimum internal daylight provision as set out in the BRE Guide and BS EN 17037 (National Annex).

SPPR 2 Minimum Private Open Space Standards for Houses

In addition, the Guidelines promote the following:

- A more graduated and flexible approach to open space that supports the development of compact housing,
- account to be taken of the value of well-designed private and semi-private open space

It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:

Table 5.1 Minimum Private Open Space Standard for Houses

House	Minimum Private Open Space	Max Semi-Private (in lieu)
1 bed	20 sq.m	10 sq.m
2 bed	30 sq.m	15 sq.m
3 bed	40 sq.m	20 sq.m
4 bed+	50 sq.m	25 sq.m

A Housing Quality Assessment has been prepared in addition to an Architectural Design Statement by Meitheal Architects, which demonstrates that the proposed scheme complies with the Guidelines and uniformly exceeds the minimum private open space requirement.

Policy and Objective 5.1 - Public Open Space

- The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum

The public open space provision of 11.55% of the developable area, demonstrates alignment with Policy Objective 5.1 – Public Open Space.

requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.

SPPR 3 - Car Parking

iii) In intermediate and peripheral locations, defined in Chapter 3 Table 3.8, the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, should be 2 no. spaces per dwelling.

SPPR 4 - Cycle Parking and Storage

Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking shall also be provided.

5.3.7 Daylight

In cases where a technical assessment of daylight performance is considered by the planning authority to be necessary regard should be had to quantitative performance approaches to daylight provision

The proposed development makes provision for a total of 112 no. car parking spaces for the 100 no. housing units. This includes 6 no. accessible parking spaces across the scheme. There are 1.5 spaces allocated to the detached and end of terrace housing units and an allocation of 0.76 car parking spaces allocated per own-door maisonette/apartment unit. Overall a parking ratio of 1.12 spaces per unit is proposed, significantly below the maximum parking standard for peripheral locations set out in SPPR 3.

The proposed semi-detached and end of terrace house units have ground floor level open space and therefore no specific bicycle parking provision is required. Dedicated bike storage is provided on the basis of 1 space per bedroom for all own-door maisonette/apartment units, which comprise 30 no. 1 bedroom units and 30 no. 2 bedroom units, equating to a requirement for 90 no. resident spaces. In line with SPPR 4, the proposed layout provides for 96 no. resident bike spaces in covered bike storage areas.

While SPPR 4 states visitor cycle parking shall be provided, it does not indicate a minimum standard. The 2023 Apartment Guidelines (now superseded by the 2025 Apartment Guidelines) states that a minimum standard for visitor bike parking should be 1 space per 2 units. On this basis the proposed development requires a provision of 30 no. visitor bicycle parking spaces. The proposed layout exceeds this minimum requirement and provides for 42 visitor spaces.

The application is accompanied by a technical Daylight / Sunlight Reception Assessment prepared by DK Partnership. This

outlined in guides like A New European Standard for Daylighting in Buildings IS EN17037:2018, UK National Annex BS EN17037:2019 and the associated BRE Guide 209 2022 Edition (June 2022), or any relevant future standards or guidance specific to the Irish context.

demonstrates that the proposed scheme is in compliance with A New European Standard for Daylighting in Buildings IS EN17037:2018, UK National Annex BS EN17037:2019 and the associated BRE Guide 209 2022 Edition (June 2022).

3.2 Planning Design Standards for New Apartments: Guidelines for Planning Authorities 2025

These guidelines supersede the Sustainable Urban Housing: Design Standards for New Apartments guidelines, originally published in 2015 and revised in 2022 and 2023. The new Guidelines are predicated on the National Planning Framework – First Revision's (2025) projection that approximately 50,000 additional households per annum need to be delivered to 2040. The delivery of apartments at central and accessible urban locations is critical to the achievement of this target. The Guidelines aim to strike a balance in ensuring that apartment development meets the needs of society in terms of standards and quality, while recognising that the economic viability of such developments is crucial to promoting an increased level of output overall. These Guidelines establish standards in relation to the following, compliance with which is addressed in the table below:

- Apartment mix;
- Internal space standards for different types of apartments;
- Dual aspect ratios;
- Floor to ceiling heights;
- Apartments to stair/lift core ratios;
- Storage spaces; and
- Amenity spaces including balconies/patios.

Policy	Consistency of Scheme								
Specific Planning Policy Requirement 1 (A) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be	We note SPP1 with regard to housing mix. As discussed in the enclosed Planning Statement prepared by HW Planning, the proposed housing mix as set out below has been devised specifically to cater for the needs of the Kenmare community and is not based on maximum or minimum standards. <table> <tr> <td>Total Residential Units</td><td>100 (100%)</td></tr> <tr> <td>1 Bedroom Maisonette Unit</td><td>30 (30%)</td></tr> <tr> <td>2 Bedroom Maisonette Unit</td><td>30 (30%)</td></tr> <tr> <td>3 Bedroom Dwelling</td><td>40 (40%)</td></tr> </table>	Total Residential Units	100 (100%)	1 Bedroom Maisonette Unit	30 (30%)	2 Bedroom Maisonette Unit	30 (30%)	3 Bedroom Dwelling	40 (40%)
Total Residential Units	100 (100%)								
1 Bedroom Maisonette Unit	30 (30%)								
2 Bedroom Maisonette Unit	30 (30%)								
3 Bedroom Dwelling	40 (40%)								

no minimum or maximum requirements for apartments with a certain number of bedrooms. (B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.	
Specific Planning Policy Requirement 2 Minimum Apartment Floor Areas • Studio apartment (1 person) – 32 sq.m • 1-bedroom apartment (2 person) – 45 sq.m • 2-bedroom apartment (4 persons) – 73 sq.m • 3-bedroom apartment (5 persons) – 90 sq.m Specific minimum room sizes as set out in Appendix 1.	The 60 no. own-door maisonette/apartments units to be provided within this scheme comprise of 1 no. and 2 no. bedroom units. All units exceed the minimum required floor areas, as outlined in the accompanying drawings and HQA prepared by Meitheal. 39 no. or 65% of the maisonette/apartment units exceed the minimum floor area standard by a minimum of 10%. This is significantly in excess of the Guideline's recommendation that 25% of all apartments in a proposed scheme shall do so. All room sizes meet or are in excess of the standards set out in Appendix of the Guidelines.
Specific Planning Policy Requirement 3 In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply (i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.	As outlined in the accompanying Architectural Design Statement, prepared by Meitheal Architects, all of the proposed own-door maisonette/apartment units are dual aspect. This equates to 100% of total apartment units, significantly in excess of the 25% requirement.
Specific Planning Policy Requirement 4 Ground level apartment floor to ceiling heights shall be a minimum of 2.7m.	As evident from the enclosed elevation drawings all proposed ground floor maisonette/apartment units are fully in line with the guidelines.

Specific Planning Policy Requirement 5 There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.	Not applicable to the proposed apartment units in this development.
Specific Planning Policy Requirement 6 The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.	Given the high percentage of smaller units (60% 1 and 2 bedroom units) in the proposed scheme the proposal does not trigger a requirement for the provision of a creche facility. This is supported by the enclosed Childcare Needs Assessment prepared by HW Planning which examines the existing childcare provision in the area and the potential childcare demand generated by the proposed scheme.
Requirements for the quantity and design of bicycle parking are set out in Section 5.25 (including SPPR 4) of the SRDCSGs.	As detailed above, the bike storage and parking provision at 96 no. resident spaces is in excess of the 90 no. spaces required under SPPR4 of the SRDCSGs. In addition, the proposed development provides for 42 no. visitor spaces, again in excess of the requirement for 30 no. visitor spaces. The enclosed detailed Proposed Site Layout Plan (Bin and Bike Storage Strategy) Drawing prepared by Meitheal Architects demonstrate that the design of the covered resident bike storage in terms of access and security is in compliance with the Cycle Design Manual and Bike Parking Infrastructure guidance.
Section 4.4 – Children's Play	The proposed landscape layout demonstrates the inclusion of natural play areas for children within the communal amenity areas.
Section 4.6 sets out that requirements for the quantity of car parking should be in line with Section 5.25 (including SPPR 3) of the SRDCSGs.	As detailed above in Section 3.1, the Proposed Site Layout Plan (Parking Strategy) Drawing prepared by Meitheal Architects indicates a total of 112 spaces are proposed, of which 6 are accessible spaces. With a ratio of 1.12 parking spaces per unit, this is significantly below the maximum standard of 2 spaces per dwelling for locations set out in the SRDCSGs for peripheral areas.
<u>Minimum floor areas for private amenity space</u>	All apartments within the scheme meet or exceed the minimum required floor areas, as outlined in

Section 3.8 of the Guidelines references the following minimum standard for private amenity space as set out in Appendix 1: One bedroom – 5 sqm Two bedroom – 7sqm Three bedroom – 9sqm	the accompanying Architectural Design Statement prepared by Meitheal Architects.										
Section 4.3 of the Apartment Guidelines The provision and proper future maintenance of well-designed communal amenity space will contribute to meeting the amenity needs of residents. Appendix 1 - Minimum floor areas for communal amenity space <table> <tr> <td>Studio</td><td>4 sqm</td></tr> <tr> <td>One bedroom</td><td>5 sqm</td></tr> <tr> <td>Two bedrooms (3 person)</td><td>6 sqm</td></tr> <tr> <td>Two bedrooms (4 person)</td><td>7 sqm</td></tr> <tr> <td>Three bedrooms</td><td>9 sqm</td></tr> </table>	Studio	4 sqm	One bedroom	5 sqm	Two bedrooms (3 person)	6 sqm	Two bedrooms (4 person)	7 sqm	Three bedrooms	9 sqm	The proposed layout makes provision for communal amenity space for all the apartment units within the scheme in line with the revised Apartment Guideline standard.
Studio	4 sqm										
One bedroom	5 sqm										
Two bedrooms (3 person)	6 sqm										
Two bedrooms (4 person)	7 sqm										
Three bedrooms	9 sqm										

3.3 Childcare Facilities: Guidelines for Planning Authorities 2001

The national Childcare Guidelines for Planning Authorities provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals.

Policy	Consistency of scheme
Appendix 2: In new communities/ new housing areas, planning authorities should require the provision of at least one childcare facility for new housing areas and other areas of residential development unless there are significant reasons to the contrary. An indicative standard of one childcare facility per 75 dwellings is recommended. One facility providing a minimum of 20 childcare facilities is considered to be a reasonable starting point	The proposed development is a residential scheme consisting of 100 units. Given the high percentage of smaller units (60% 1 and 2 bedroom units) in the proposed scheme the proposal does not trigger a requirement for the provision of a creche facility. This view is based on Section 4.7 of the 2025 Apartment Guidelines which states that: <i>'One-bedroom or studio type units should not generally be considered to contribute to a requirement for any on-</i>

The threshold for provision should be established having had regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas

site childcare provision and subject to the factors above, this may also apply in part or whole, to units with two or more bedrooms'

If a conservative approach is adopted and only the 30 no. 1 bedroom units are excluded from consideration and 100% of the 2 and 3 bedroom units are considered, the potential childcare demand generated remains below the 75 unit threshold specified in the Guidelines which triggers a requirement for the provision of a creche.

The detailed rationale underpinning this conclusion is outlined in the accompanying Childcare Needs Assessment prepared by HW Planning. This has in addition considered the geographical distribution of existing and permitted childcare facilities in the area as well as the demographic profile of Kenmare.

3.4 Design Manual for Urban Roads and Streets, 2019

The Design Manual for Urban Roads and Streets provides guidance relating to the design of urban roads and streets. The document presents a series of principles, approaches and standards that are necessary to achieve balanced, best practice design outcomes with regard to street networks and individual streets. The relevant principles, approaches and standards listed in the table below are intended for use by suitably qualified and experienced designers who work within the built environment professions in order to create attractive streets and roads which facilitates a broad range of users.

Relevant Principles and Guidelines	Consistency of scheme
1. Integrated Street Networks 2. Movement and Place 3. Permeability and Legibility 4. Management 5. Movement, Place and Speed 6. Streetscape 7. Pedestrian and Cyclist Movement 8. Carriageway Conditions	This Large-scale Residential Development application is supported by a detailed Traffic & Transport Assessment (TTA) prepared by MHL Consulting Engineers which addresses the relevant policies and principles listed in the Design Manual for Urban Roads and Streets, 2019 in order to create a balanced and attractive street and road network for the proposed development.

Regional Planning Policy

4.1 Southern Regional Spatial & Economic Strategy for the Southern Region 2020 (RSES)

The purpose of the RSES is to support the implementation of the National Planning Framework while facilitating choices that reflect the differing needs of the regions. The strategies are being proposed in the context of a renewed focus on “Regional Parity” in the NPF, being promoted to address anti-competitive pressures on Dublin by offering more sustainable choices and options for people, businesses and communities that can positively influence more sustainable patterns of living and working which benefit our entire society and make our economy more equitable and resilient. The vision for the Southern Region is outlined in the RSES as follows:

“To promote the Southern Region as an attractive, competitive and sustainable place to live, work and visit, a region of considerable opportunity for growth based on the quality of its cities, towns and rural areas, well developed physical and social infrastructure, a diverse modern economy and a pristine natural environment.”

Based on its 2022 Census population of 2,566 Kenmare falls into the ‘Towns and Villages’ category in RSES Table 3.2:

‘Towns and villages of above 1,500 which provide a housing, employment or service function. The category is broad and ranges from large commuter towns to more remote towns and villages ‘

Table 3.2 notes that the policy relating to these areas is to be set out at Development Plan and Local Area Plan level.

Policy	Consistency of Scheme
Transitional Local Authority Population projections to 2031 (refer to table below)	The table below highlights the population projections for Kerry up until 2031. The ‘Transitional Local Authority Population Projections’ target an increase in population of 19,000 for the County of Kerry. This amounts to an increase in the Kerry population by 1,727 persons per annum. This is an ambitious population target. The proposed development situated within Kenmare Urban Area will contribute to a positive increase in population towards achieving this population target.

South-West ¹¹					
	2016	2026	Uplift ¹²	2031	Uplift ¹³
Kerry	147,500	161,000-163,500	13,500-16,000	166,500-170,500	19,000-23,000

RPO 5 - Increased population growth should be planned having regard to environmental criteria including:

- The assimilative capacity of the receiving environment.
- The proximity of Natura 2000 sites and the potential for impact on the conservation objectives and qualifying interests.
- Areas with flood potential

The proposed development is located within Kenmare Town and proposed increases in population are in accordance with the objectives of the National Planning Framework as reflected in the RSES for the southern region.

The proposal has been shaped taking into consideration the environmental constraints of the site. The following accompany this application:

- Flood Risk Assessment
- Drainage Impact Assessment
- Ecology Impact Assessment Report
- Archaeological Impact Assessment & Test Trenching Report

The site is zoned for residential purposes. The principle of the proposed development is therefore acceptable and with a focused strategy and design, the proposal can accommodate positive development of a zoned site.

A Flood Risk Assessment (FRA) is included within the Drainage Impact Report prepared by MWP Consulting Engineers. It notes that the Kealnagower Stream, a tributary of the Finnihy River traverses the lands to the north of the subject site which is consequently considered to be subject to flood risk. The findings of the FRA have informed the design of the proposed site layout and the proposed site levels which ensures that no development is proposed in areas at risk of flooding.

The subject site is located upstream of the Kenmare National Park, Macgillycuddy Reeks and Caragh River Catchment SAC, the Kenmare National Park SPA, the Castlemaine Harbour SAC and the Castlemaine Harbour SPA.

The application is accompanied by an Environmental Impact Assessment (EIA) Screening Report as well as an Appropriate Assessment Screening and Natura Impact Statement Report

	that assess the impacts of the development on these European Sites
<u>RPO 5 -Population Growth and Environmental Criteria</u> Increased population growth should be planned with regard to environmental criteria, including: ▪ Assimilative capacity of the receiving environment. ▪ Proximity of Natura 2000 sites and potential for adverse effects on these sites, and their conservation objectives. ▪ Areas with flood potential	The proposed development is located within an evolving urban context and within walking or cycling distance of a variety of local employment, educational, retail and recreational opportunities in the local area and nearby Kenmare town centre. The activation of these lands represents the appropriate expansion of the existing settlement, with the site layout design taking into consideration the environmental constraints and opportunities of the site, including the presence of existing residential developments and extensive retail and educational facilities in proximity to the site. From a recreational amenity perspective, the site is located to the north of Kilgarven Road, where Kenmare Golf Club, Reenagross Woodland Park and Kenmare Shamrocks GAA are located. The Finnity River and the Roughty River Estuary are also accessible from the subject site. The supporting documentation that accompany this application include an EIA Screening Report and a Natura Impact Statement that have assessed all likely significant effects on the environment arising from the proposed development.
<u>RPO 9 - Holistic Approach to Delivering Infrastructure</u> It is an objective to ensure investment and delivery of comprehensive infrastructure packages to meet growth targets that prioritises the delivery of compact growth and sustainable mobility in accordance with NPF objectives including: Water services, digital, green infrastructure, transport and sustainable travel, community and social, renewable energy, recreation, open space amenity, climate change adaptation and future proofing infrastructure including Flood Risk management measures, environmental improvement, arts, culture and public realm.	The proposed development will provide for increased population growth at a residentially zoned site in Kenmare. This will assist with the achievement of objectives in place for the settlement to deliver additional residential units between the 2022 – 2028 period. The proposed development incorporates Sustainable Urban Drainage Systems (SUDS) and green infrastructure as part of the wider surface water drainage strategy for the lands.
<u>RPO 124 - Green Infrastructure</u> (a) It is an objective to promote the concept of connecting corridors for the movement of wildlife and encourage the retention and creation of features of	A core principle of the proposed development has been to adopt a collaborative approach between the sites engineering, landscape and biodiversity strategies to best achieve green infrastructure principles. The site design has sought to retain

biodiversity value, ecological corridors and networks that connect areas of high conservation value such as woodlands, hedgerows, earth banks, watercourses and wetlands.

where possible existing hedgerows and field boundaries.

RPO 151 - Integration of Land Use and Transport

The following principles of land use and transport integration will guide development:

- For urban-generated development, the development of lands, within or contiguous with the existing urban areas will be prioritised over development in less accessible locations.
- Residential development will be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport– including infill and brownfield sites are prioritised.
- Land use development in smaller rural towns will optimise public transport and sustainable travel integration within settlements. Public transport interchange will be facilitated to encourage modal shift to public transport and sustainable travel between settlements and on approach to settlements. The strategic transport function of national roads will be maintained and protected in accordance with national policy.
- New employment and residential development will be consolidated and intensified in a manner which renders it serviceable by public transport and ensures that it is highly accessible, by walking, cycling and public transport. Within the Metropolitan Areas of Cork, Limerick and Waterford, except in limited planned circumstances, trip intensive developments or significant levels of development will not occur in locations which are not well served by existing or proposed high capacity public transport
- Infrastructure for Electric Vehicles will be integrated into developments;
- The design of all roads and streets within the urban areas, including suburbs, towns and villages within the 60 kph zone shall be as

The proposed development satisfies all the criteria outlined in RPO 151. The subject site is situated within an area that benefits from existing and proposed transportation links located close to the sites including a planned Cycleconnect Inter Urban route in close proximity to the south of the site. Furthermore, the layout of the site makes provision for the delivery of an east-west walkway through the site in line with the Kenmare Municipal District Local Area Plan 2024 'Indicative Walkway' objective connecting the lands to the town centre.

The proposed development includes pedestrian areas and traffic calming measures throughout the scheme that will promote increased and safer levels of walking and cycling within the settlement.

per the Design Manual for Urban Roads and Streets, being the designated appropriate road design standards for such locations. ▪ The protection of the Natura 2000 networks and the ecological linkages connected to the Natura 2000 network.	
The RSES places a significant emphasis on quality placemaking and the creation of new sustainable neighbourhoods. RPO 176 '10 minute City and Town Concepts' aims to. <i>"attain sustainable compact settlements whereby, a range of community facilities and services are accessible in short walking and cycle timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services".</i>	The subject site is ideally located to capitalise on its sustainable location within walking/cycling distance of Kenmare town centre, the existing Bus Éireann services to Killarney and Skibbereen (hourly) and Cork City (via Bandon/Bantry), Waterville and Castletownbere. The site is set to benefit from a planned Cycleconnect Inter Urban route in close proximity to the south of the site. Furthermore, the layout of the site makes provision for the delivery of an east-west walkway through the site in line with the Kenmare Municipal District Local Area Plan 2024 'Indicative Walkway' objective connecting the lands to the town centre.
<u>RPO 200 - Green Infrastructure and Recreation</u> It is an objective to support investment in the on-going maintenance and enhanced facilities in existing green infrastructure and support the provision of new public parks, green space in tandem with projected population growth to create green, healthy settlements throughout our Region. Local authorities shall identify the potential locations of new public parks and open spaces jointly (with neighbouring local authorities) and individually to develop both regional scale recreational open space and local parks and open space. Local authorities should ensure that decision-making in relation to the development of new or enhanced Green Infrastructure and new public parks and facilities is informed by an appropriate level of environmental assessment.	In accordance with RPO 200 and the objectives of the County Development Plan, the Green Infrastructure proposed for the site includes the integration of vegetation, trees and open green spaces, combined with blue infrastructure initiatives such as sustainable water management, promote sustainability, enhance biodiversity, support health ecosystems, and improve the overall quality of life for residents. This results in a co-ordinated approach between green infrastructure/recreational features and future residents' enjoyment of these aspects. The Landscape Design Report prepared by Simon Ronan Landscape further details the landscaping approach for the development.
<u>RPO 218 - Sustainable Urban Drainage and Rainwater Harvesting</u> It is an objective to support the incorporation of Sustainable Urban Drainage Systems (SUDs) in all public and private development in urban areas. The	The accompanying Infrastructure Report prepared by MWP Consulting Engineers outlines the SuDS strategy for the subject site. The design of the proposal has incorporated several sustainable nature-based drainage solutions. Implementation of these SuDS measures during construction and

local authorities shall include objectives requiring the incorporation of SUDs in local authority development plans and Local Area Plans, promote greater rainwater harvesting by households and businesses for the diversion of storm water from combined sewers (where possible), so that within developments and in the wider public realm, opportunities for SUDs and rainwater harvesting maximise capacity to cater for infill, brownfield and new development in sewer networks and treatment plants.

operation of the site will achieve this regional objective.

Local Planning Policy

5.1 Kerry County Development Plan 2022-2028 (CDP)

The Kerry County Development Plan (CDP) outlines objectives and parameters for housing development in the County for 2022-2028. The Plan is underpinned by a number of key principles which include sustainability, social inclusion, high quality design and climate change adaptation. The Plan establishes a hierarchical network of settlements in the County, allocating related population and housing growth projections.

It should be noted that all Council's CDPs are currently undergoing a variation process to ensure that their population targets align with those in the First Revision to the NPF 2025.

Chapter 3 of the CPD outlines the Core Strategy for the county over the lifetime of the plan. The strategy places an emphasis on achieving sustainable settlements centred around obtaining compact growth and utilising sustainable modes of transport including public transport, walking and cycling. Kenmare is identified as a Regional Town and an appropriate location to prioritise sustainable development.

Policy	Consistency of Scheme
Objective KCDP 3-2 – Core Strategy <i>Support the sustainable growth and prioritise development of the county's settlements in accordance with the Settlement Hierarchy and the Core Strategy.</i> Table 3.6 of the KCDP identifies Kenmare as a Regional town. Table 3.5 describes Regional Towns as: <i>Towns which provide a housing, employment, or service function serving a local region within the county. The category is broad and ranges from large commuter towns to more peripheral town's.</i> Objective KCDP 3-5 – Settlement Strategy <i>Strengthen the social and economic structure of rural towns and villages by supporting the re-use</i>	As shown in the Core Strategy Table 3.6, the KCDP sets a growth target for the entire county of 9,363 persons by 2028. In distributing the projected population growth throughout the country, the CDP envisages at least 30% of this growth within the Key towns of Tralee and Killarney. This equates to an increase of 261 persons in Kenmare town. Table 3.7 of the KCDP calculates the housing requirement to meet this population target for Kenmare as 204 units within the existing 29.9 hectares of zoned land. We note from the CDP Two Year Review that in the first 2 years of the CDP plan period the aggregate number of housing completions in Kenmare has been 35 units, approximately 50% of the units required to be delivered per annum to meet the Core Strategy target of 204 units by 2028. The proposed development of 100 units contributes positively towards achieving these population targets and housing requirement figures.

of existing buildings and the regeneration of under-utilised buildings and lands.

Section 3.10.3 of the Core Strategy relates to population distribution;

Settlement	Population		Housing		Land Zoning Required	
	Population 2016 (CSO)	Population 2022 (est.)	2022-2028 Pop. Growth	Housing Target	Existing Zoned Land (ha)	Zoned Land Required (ha)
Regional						
Town	Listowel	4,820	5,127	529	415	10.8
	Castlesland	2,486	2,644	359	281	9.2
	Kenmare	2,376	2,527	261	204	29.9*

* Existing zoning in Kenmare is that which is included in the Kenmare Functional Area Local Area Plan 2010-2016 and existing zoning in Killorglin is that which is included in the Killorglin Functional Area Local Area Plan 2010-2016, both prepared prior to the adoption of a Core Strategy.

Extract from Table 3.7: Core Strategy Table
(Kerry County Development Plan 2022-28)

Section 3.11 – The Zoning of Land for Residential Development

In general housing densities will be higher closer to the town and village centre and lower toward the edge of settlement. In the majority of settlements infill and vacant sites are available within close proximity to the town/village centre. It is proposed to prioritise the development of residential units on these vacant and infill sites.

The proposed development will contribute towards achieving the strategic aims of the CDP and deliver compact development within an existing under-utilised site within the settlement boundary.

The density of the scheme, at 39 units per ha, is an appropriate scale given the locational factors, the design response to which necessitates appropriate consideration of existing scale and grain of development and the incorporation of suitable setbacks from the archaeological feature and flood risk area.

Objective KCDP 4-10 – Placemaking

Ensure the creation of attractive, liveable, well designed, high-quality urban places that are home to diverse and integrated communities that enjoy an enhanced quality of life and wellbeing.

Objective KCDP 4-15 – Urban Design and Built Environment

Promote the guidance principles set out in the 'Urban Design Manual – A Best Practice Guide' (2009), and in the 'Design Manual for Urban Roads and Streets' (2019) and promote a more pedestrian friendly environment through the provision of traffic calming measures and improved pedestrian infrastructure.

Objective KCDP 4-17 – Accessibility and Mobility

Facilitate the development of sustainable compact settlements with the "10-minute" town concepts, whereby, a range of community facilities and services are accessible in short walking and cycle timeframes from homes, with walkways and link routes to Greenways or are

The proposed development takes cognisance of the Guidelines on Sustainable Residential Development and Compact Settlements 2024 (refer to Section 2 of this document), which replaced the 2009 Guidelines. These Guidelines in conjunction with DMURS have formed the basis of the design rationale for the proposed development.

The housing mix proposed provides for a variety of housing types and sizes including houses and maisonette/apartments and is in accordance with guidance outlined Guidelines.

The development promotes sustainable methods of transport including walking, cycling and public transport. The information contained in the accompanying Traffic and Transportation Assessment prepared by MHL Consulting Engineers demonstrate that the site is well served from a pedestrian/active travel connectivity viewpoint, with a shared facility available on both sides of the Pat Scarteen Rd at the access to the site and footpaths along the R569 and the Railway Rd in the vicinity of the site connecting to the town centre. The nearside footpath extends to the National and Secondary school to the north of the site extended past the Aldi, Lidl and Supervalu.

The site is within walking distance of Kenmare Town Centre, Kenmare's main bus stop, employment centres. The Draft

accessible by high quality public transport services connecting people to larger scaled settlements delivering these services.

Objective KCDP 4-18 – Accessibility and Mobility

To prioritise walking routes and to deliver a high level of priority and permeability for walking, cycling and public transport modes, in accordance with the principles of movement, place and permeability as laid out in the Design Manual for Urban Roads and Streets 2019, to ensure the creation of accessible, permeable links to places of work, retail, services, educational and community facilities.

Objective KCDP 4-27 – Active Land Management

Prioritise the regeneration of underused town centre and brownfield / infill lands in order to achieve the sustainable delivery of new housing within the existing urban footprint of settlements in the County.

Objective KCDP 4-22 – Green Infrastructure

Protect, enhance and ensure that existing and proposed developments located within or adjacent to areas of Green Infrastructure incorporate any important biodiversity features into the overall development in a sustainable manner.

Objective KCDP 4-23 – Green Infrastructure

Encourage and facilitate, in consultation with relevant stakeholders, the development of green infrastructure that recognises the synergies that can be achieved with regard to the following:

- *Provision of open space amenities*
- *Sustainable management of water*
- *Protection and management of biodiversity*
- *Protection of cultural heritage*
- *Protection of protected landscape sensitivities*

CycleConnects Plan identifies an inter-urban Cycle Route in close proximity to the south of the subject site. The Kenmare Zoning Map Indicative Walkway Objective through the subject site will be delivered by the Proposed Development, contributing towards the improved connectivity of the site with the town centre.

The development provides for a variety of different types of public open spaces across the site layout. This includes the provision of larger, informal 'kick-about' areas suitable for active recreation and a series of smaller landscaped spaces that offer opportunities for passive recreational and quiet enjoyment.

In addition, there is a proposed additional green space to adjoin the neighbouring G1 – 'Open Space' zoned lands to the east to further integrate the site into the existing urban and landscape context.

The layout is designed around permeable pedestrian linkages to other key facilities and recreational areas in the vicinity. The scattered location of the play areas and green spaces will ensure that all residential units within the development have convenient and high-quality public spaces at their doorstep.

The scheme design is landscape led and therefore inherently responds to the presence of a number of significant landscape features in the vicinity. The layout is also tailored to respect the presence of archaeological and heritage features.

One of the key factors of the proposed development is the protection and enhancement of biodiversity and the natural environment. The retention of much of the existing perimeter hedgerows and trees will form amenity and biodiversity

	corridors which will serve and connect all areas of the site and natural areas beyond. Ecology surveys have been carried out to identify the species present on the site and the impact the development will have on the species. The enclosed Ecological Impact Assessment Report prepared by MWP Consulting Engineers sets out the suit of construction measures incorporated into the CEMP to mitigate against any potential impacts. This is informed by a site-specific Bat Report prepared by Greenleaf Ecological Consultants.
Objective KCDP 4-40 – Residential Densities and Building Heights <i>Ensure that developments have regard to the Ministerial Guidelines, Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities the DHPLG (2020), Urban Development and Building Heights – Guidelines for Planning Authorities DHPLG (2018) and Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) DEHLG (2009).</i>	As identified previously (Section 3) the proposed development has had full regard to the provisions of the Ministerial Guidelines on Sustainable Residential Development in Urban Areas and its replacement Compact Settlement Guidelines and the accompanying, the Height Guidelines and Apartment Guidelines. An Architectural Design Statement prepared by Meitheal Architects accompanies this submission which addresses the proposed developments compliance with the 4 no. Key Indicators of Quality Urban Design and Placement as set out in the 2024 Compact Settlement Guidelines. The enclosed Housing Quality Assessment prepared by Meitheal Architects indicates the scheme's compliance with the Apartment Guidelines. The proposed development height of 2 storey reflects the prevailing building heights in the area and complies with the Urban Development and Building Heights Guidelines for Planning Authorities 2018.
Objective KCDP 6-2 – Population & Community Profile <i>Support the provision and distribution of a range of community infrastructure facilities in accordance with the Settlement and Core Strategies to meet the needs of the County's population structure in conjunction with other statutory, voluntary, private sector agencies and community groups.</i> Objective KCDP 6-3 – Climate Change & Sustainable Communities <i>Continue to support the creation of sustainable communities throughout the County by facilitating the creation of attractive neighbourhoods where there are strong links and connections to local services, community facilities and employment areas and where</i>	A range of public amenity areas are provided as part of the development.

walking, cycling, and public transport is prioritised and which supports the retention of existing ecological features and supports the planting of native species in green and public areas.

Objective KCDP 6-6 – Climate Change & Sustainable Communities

Require new buildings to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD).

Objective KCDP 6-16 – Density

Have regard to and promote increased residential densities in the towns and other appropriate locations in accordance with the 'Sustainable Residential Development in Urban Areas' Guidelines 2009 (DoEHLG).

The site was categorised as an 'Outer Suburban / Greenfield Site' according to the 2009 SRDUA Guidelines, providing for net residential densities in the general range of 35-50 dph.

In accordance with the replacement 2024 Compact Settlement Guidelines the subject site is located in the Medium Town of Kenmare. This is reflected in the proposed density of 39.5 dph, which is within the applicable density range as set out in the 2024 Guidelines (25 dph to 40 dph net).

As a zoned site within the development boundary of Kenmare, this constitutes a positive increase in residential density at an appropriate location primarily due to its proximity to key educational, health and amenity facilities and the availability of sustainable travel options.

Objective KCDP 6-17 – Social Housing

Promote integration of social housing and ensure a housing mix within developments in order to promote a socially balanced and inclusive society.

Objective KCDP 7-7 – Social Housing

Ensure that arrangements for the provision of Social Housing are made having regard to the current Housing Strategy in accordance with Part V of the Planning & Development Act 2000 as amended.

Objective KCDP 6-18 – Taking in Charge

Ensure that housing developments are completed to a standard that is in accordance with Kerry County Council's Taking in Charge Policy for Private Housing Developments.

The housing mix proposed provides for a variety of house types and sizes plus apartments and is in accordance with guidance outlines in the 2024 Guidelines on Sustainable Residential Development in Compact Settlements. In line with Objective KCDP 7-7, it also has regard to Part V of the Planning and Development Act 2010 (as amended), with provision made for 20 no. Part V units. A Part V Proposal prepared by HW Planning is enclosed with the application.

The proposed development is brought forward in accordance with the Kerry County Council's Taking in Charge Policy for Private Housing Developments.

Objective KCDP 6-20 – Walking & Cycling <i>Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.</i> Objective KCDP 6-21 – Universal Access <i>Identify and promote best practice with regard to universal design of the built and external environment in line with “Building for Everyone – A Universal Design Approach” and to increase the likelihood that people will be able to remain in their own homes longer and function better as they face aging-related disabilities</i> Objective KCDP 6-23 – People with a Disability <i>Ensure that all buildings, public and open spaces, recreational and amenity areas are accessible for people with disabilities, having regard to the Building Regulations, the objectives of ‘Building for Everyone’ (National Disability Authority) and ‘Access for the Disabled’ (No. 1 to 3) (National Rehabilitation Board).</i>	The development promotes sustainable methods of travel including walking, cycling and public transport. The information in the accompanying TTA prepared by MHL Consulting Engineers demonstrate the site’s current and future connectivity with places of work, retail, services, educational, recreational amenities and community facilities in the surrounding areas. The scheme has been designed to be universally accessible.
Objective KCDP 6-33 – Sporting, Leisure Facilities and Open Space <i>Implement the recommendations of ‘Developing Play in Kerry Policy’, in a sustainable manner, in conjunction with all relevant agencies.</i>	The proposed development has provided for a variety of different recreational spaces with natural play features and several incidental and garden play areas all of which have been designed in accordance with the ‘Developing Play in Kerry’ Policy 2004. Refer to enclosed Landscape Design Report prepared by Simon Ronan Landscape.
Objective KCDP 6-36 – Open Space <i>Provide multifunctional open spaces at locations deemed appropriate providing for both passive and active uses.</i>	The scattered location of the play areas and green spaces will ensure that all residential units within the development have convenient and high-quality public spaces at their doorstep.
Objective KCDP 6-52 – Childcare <i>Facilitate the provision of childcare facilities and new and refurbished schools on well- located sites within or close to existing built-up areas, that meet the diverse needs of local populations.</i>	The proposed development is a residential scheme consisting of 100 units. Given the high percentage of smaller units (60% 1 and 2 bedroom units) in the proposed scheme the proposal does not trigger a requirement for the provision of a creche facility. The detailed rationale underpinning this conclusion is outlined in the accompanying Childcare Needs Assessment prepared by HW Planning. This has in addition considered the existing

	geographical distribution of childcare facilities in the area as well as the demographic profile of Kenmare.
Objective KCDP 7-8 – Density <i>Have regard to and promote increased residential densities in the towns and other appropriate locations in accordance with the policies of the NPF, RSES, Housing for All and the 'Sustainable Residential Development in Urban Areas' Guidelines 2009 (DoEHLG).</i>	The proposed development has a net density of 39.5 no. units per hectare. As a zoned site within the development boundary of Kenmare, this constitutes a positive increase in residential density at an appropriate location primarily due to its proximity to key educational, health and amenity facilities and the availability of multi-modal travel options.
Objective KCDP 7-9 – Housing Mix <i>Promote integration of social housing and ensure a housing mix within developments in order to promote a socially balanced and inclusive society.</i>	The housing mix proposed provides for a variety of house types and sizes plus apartments and is in accordance with the CDP objective and the Guidelines on Sustainable Residential Development and Compact Settlements. The proposed scheme will consist of 100 residential units comprising 40 no. 3-bed houses and 30 no. own-door maisonette apartment units (30 no. 1-bed units and 30 no. 2-bed units), 20 no. units have been allocated as social dwellings which further contributes to creating a socially balanced and inclusive society.
Objective KCDP 7-20 – Housing Options for Older People <i>Provide and facilitate the provision of suitable accommodation in appropriate locations to meet the needs of older people and to encourage the provision of a range of sustainable housing options for older people in central, convenient and easily accessible locations and to integrate such housing with mainstream housing where possible.</i>	The Kerry County Development Plan 2022 – 2028 (CDP) notes that Kerry has an ageing population and is likely that the population over 80 will quadruple by 2040. We envisage that the target group for the own-door maisonette /apartments will be retirees and young professionals working in Kenmare.
Objective KCDP 8-24 – Archaeological Heritage <i>(i) Secure the preservation in situ of all sites, features, protected wrecks and objects of archaeological interest within the county. In securing such preservation the Council will have regard to the advice and recommendations of the National Monuments Service, Department of Housing, Local Government and Heritage, the</i>	The scheme design is landscape led and therefore inherently responds to the presence of a number of significant landscape features in the vicinity. The layout is also tailored to respect the presence and ensure the preservation in situ of archaeological and heritage features. The application is supported by an Archaeological Impact Assessment Report prepared by AEGIS Archaeologists. There are no recorded protected structures located on the site.

National Museum of Ireland, and the County Archaeologist.

Objective KCDP 8-40 – Record of Protected Structures

Ensure that any development, modification, alteration, or extension affecting a protected structure and/or its setting including designed landscape features and views, is compatible with the special character of that structure.

Objective KCDP 11-22 – Ecological/Urban Blue Corridors

Encourage and facilitate the retention and creation of features of local biodiversity value, ecological corridors and networks that connect areas of high conservation value such as watercourses, woodlands, hedgerows, earth banks and wetlands.

One of the key factors of the proposed development is the protection and enhancement of biodiversity and the natural environment. The retention of existing perimeter trees will form amenity and biodiversity corridors which will serve and connect all areas of the site and natural areas beyond.

Objective KCDP 11-42 – Light Pollution

Require proposals for development that include the provision of external lighting, to clearly demonstrate that the lighting scheme is the minimum needed for security and working purposes and also to ensure that external lighting and lighting schemes are designed so that the incidence of light spillage is minimised ensuring that the amenities of adjoining properties, wildlife and the surrounding environment are protected.

The development provides for an appropriate level of street lighting. The application is accompanied by a Public Lighting Assessment Report that indicates the positioning, style and quantity of lighting for the development.

Objective KCDP 11-43 Light Pollution

Support the Kerry International Dark-Sky Reserve and ensure that all new external lights comply with the objectives of the Kerry International Dark Sky Reserve.

Objective KCDP 11-44 – Light and Biodiversity

Take into consideration the Bat Conservation Trust 2018 Note 08/18 Bats and Artificial Lighting in the UK Guidelines when choosing lighting specifications for developments and/or Bat specialist advice, so as to ensure the requirements of the Habitats Directive are adhered to, including Article 10.

Objective KCDP 11-66 Land Use and Flood Risk <i>Have regard to and implement the recommendations and provisions of the Planning System and Flood Risk Management guidelines (DoEHLG 2009).</i>	The enclosed Flood Risk Assessment, included within the Drainage Impact Assessment Report prepared by MWP Consulting Engineers concludes that the proposed residential development is appropriate for the site's flood zone category, the sequential approach outlined in the Planning System and Flood Risk Management Guidelines has been adhered to, a conservation approach has been undertaken, and the proposed development will not increase run-off rates when compared with the existing site and satisfies the requirement of the FRA to not increase flooding.
Objective KCDP 11-78 – Landscape Sensitivity <i>Protect the landscapes of the County by ensuring that any new developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of their area. Any development which could unduly impact upon such landscapes will not be permitted.</i>	The enclosed Landscape Design Report prepared by Simon Ronan Landscape indicates how the design concept responds directly to the site's character and the key drivers identified in the baseline analysis. A landscape-led approach has been adopted to ensure that appropriate design solutions have been adopted, which respond to the characteristics and constraints of the receiving environment.
Objective KCDP 11-79 – Views and Prospects <i>Preserve the views and prospects as defined on Maps contained in Volume 4</i>	The enclosed Landscape Design Report prepared by Simon Ronan Landscape indicates how the design concept responds directly to the site's character and the key drivers identified in the baseline analysis. A landscape-led approach has been adopted to ensure that appropriate design solutions have been adopted, which respond to the characteristics and constraints of the receiving environment.
Objective KCDP 13.24: Storm Water Management <i>Support the incorporation of Sustainable Urban Drainage Systems (SUDs) in all public and private development in urban areas.</i>	The delivery of the proposed scheme will include storm water management measures including the provision of SUDS measures across the development as outlined in the material prepared by MWP Consulting Engineers
Objective KCDP 14-15 Active Travel 7 Greenways <i>Promote the sustainable development of the public footpath network, the walking and cycling routes and associated infrastructure in the County, including where possible the retrofitting of cycle and pedestrian routes into the existing urban road network and in the design of new roads.</i>	The delivery of pedestrian and cycle connectivity improvements has been considered in detail as part of the proposed development with a view to maximizing existing available opportunities where possible and reducing car dependency.

Objective KCDP 14-29 - National Primary and Secondary Roads

Protect the capacity and safety of the National Road and Strategically Important Regional Road network in the County and ensure compliance and adherence to the provisions of official Government policy outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoEHLG, 2012) in order to safeguard carrying capacity and safety of National Primary and Secondary Routes and associated national road junctions.

All safety issues in relation to traffic and road infrastructure have been assessed in the enclosed Stage 1 Road Safety Audit produced by MHL Consulting Engineers which accompanies this application.

Objective KCDP 14-41 - Parking Provision

Support and facilitate the sustainable provision of public parking facilities for all users at appropriate locations, to be informed by parking strategies including bus parking and electric vehicles within and on the edge of towns and villages, and at tourist and recreation sites such as beaches, walkway/cycleway trailheads, scenic viewing points and routes subject to compliance with any environmental designation requirements.

Due to the sustainable location of the subject development and the desire to achieve modal shift away from the private car, a reduced car parking provision of 112 no spaces is proposed, consistent with Ministerial Guidelines.

In addition, 138 no. total bicycle spaces have been provided including 96 no. spaces for the future maisonette/apartment residents' and 42 no. visitor spaces. This cycle parking provision is in excess of the development standards/guidelines of the Kerry County Development Plan, and in line with and the relevant section of the 2022 Apartment Guidelines.

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These planning areas are as follows:

Area 1	Retail core areas (Tralee, Killarney & Listowel)
Area 2	Lands Located within town centres (Areas zoned M2)
Area 3	All other areas (& other settlements)

(note: the retail core & town centres M2 lands are shown on the land use zoning maps in the relevant plan & LAPs)

Table 4: Parking Requirements

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

Childcare Facilities	Per 4 children	0	0	1	1
	Per staff member	-	-	1	

Objective KCDP 14-72: - Public Rights of Way

Protect all existing Public Rights of Way (including those not listed in this plan) and ensure that development does not impinge on these routes.

The proposed development promotes walkability and pedestrian movements within the site and within its wider context. The proposed development will deliver the CDP Indicative Walkway Objective across the subject site which will facilitate connectivity with the town centre from the wider area. The site itself is also highly accessible on foot from a range of other key facilities and services.

CDP Development Management Standards - Residential

1.5.1.1: Design Statement

A design statement will be required to accompany all planning applications for residential development in excess of four dwellings (less than four if deemed necessary). The Design statement shall take guidance from the 'Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (DoEHLG 2009)'.

An Architectural Design Statement prepared by Meitheal Architects accompanies this submission. The Housing Quality Assessment document also prepared by Meitheal Architects addresses details and calculations on plot ratio and site coverage.

Design considerations for energy consumption are outlined in the Climate Action and Energy Report by DK Partnership.

1.5.2: Density

In general, the number of units to be provided on a site should be determined with reference to the Guidelines for Planning Authorities on 'Sustainable Residential Development in Urban Areas' (2009) or any update thereof. This Plan seeks to promote the development of 'live work' communities by promoting sustainable development by creating compact, high-quality developments. Higher residential densities will be encouraged within walking distance of town and village centres and public transport infrastructure.

It is acknowledged that there may be instances where specified densities cannot be achieved due to specific circumstances such as site constraints; however, all developments should strive to achieve the prescribed density to support the delivery of more compact development and to ensure a maximum return on investment in social and physical infrastructure.

In assessing the density proposed for a residential development, the Planning Authority will consider the following:

- *Proximity to neighbouring and district centres.*
- *Proximity to public transport bus stops.*
- *The extent to which the design and layout follows a coherent*

The application site is 'Centre and Urban Neighbourhood' as it complies with Section 5.11 of the Sustainable Residential Development in Urban Areas' (2009) guidelines.

The guidelines provide for net residential densities in the general range of 40-100 dph.

In accordance with the replacement 2024 Compact Settlement Guidelines the subject site is located in an 'Edge' area of Kenmare, a Regional Town. This is reflected in the proposed density of 39.5 dph, which is within the density range as set out in the 2024 Guidelines, 25 dph –40 dph (net).

While the subject site is considered an 'edge' area it also has characteristics of an 'Urban Neighbourhood' where the appropriate density range is 40 dph – 100 dph (net).

The proposed residential net density of 39.5 dph reflects this and the site's context, surrounded by existing residential development, facilities and services and well connected to the local town centre.

design brief resulting in a high-quality residential environment.

- *Compliance with qualitative and quantitative criteria.*
- *The extent to which the site may, due to its size, scale and location, propose its own density and character, having regard to the need to protect the established character and amenities of existing adjoining residential areas.*
- *Existing topographical, landscape or other features on the site.*
- *The capacity of the infrastructure, including social and community facilities, to absorb the demands created by the development. The same criteria will be applied to development proposals involving an increase in density on existing housing sites*

1.5.3 Dwelling Design, Size & Mix

Planning applications for 15+ residential units will be required to incorporate a variety and choice of housing units by type and size to meet differing household needs and requirements, as informed by the HNDA to address:

- *Existing and emerging household formation sizes.*
- *Housing demand patterns.*
- *Identified County housing trends*

The Design Statement associated with development proposals for both new residential communities, and for developments within existing built-up footprints of an urban area, shall include:

- *Details of existing and permitted unit types within a 10-minute walk of the proposed development.*

- *A breakdown of the proposed unit type and size, including the percentage split between 1/2/3+ bed*

The Architectural Design Statement prepared by Meitheal Architects and the Planning Statement prepared by HW Planning which accompany this application address these requirements.

units which, in the case of apartments (and duplexes), shall be in accordance with the 'Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities' (2009), 'Sustainable Urban Housing Design Standards for New Apartments (2020)', and 'Urban Development and Building Heights, Guidelines for Planning Authorities (2018)', or any subsequent amendment/ revision of these.

- *Site and/ or floor plans that clearly identify proposed units that: Are designed and located having regard to the needs of older people and/or persons with a disability.*
- *Are designed having regard to the concept of lifetime adaptable and/or multigenerational homes.*
- *A statement outlining how the scheme has been designed for the needs of older people/ or persons with a disability and or lifetime homes.*

1.5.4 General Residential Development Design Standards

The design and layout of individual dwellings should provide a high-quality living environment for residents. Variety in design, within a unified concept, will generally be required. This may be achieved through scale and massing, roof profiles, materials and decorative details.

In smaller scheme, i.e. less than 15 units, uniformity in design and finishes may be acceptable, depending on the site context.

Dwellings should also be designed to provide adequate room sizes that create good quality and adaptable living spaces. Open space should be located behind the front building line of the house and be designed to provide for adequate private amenity. Designers should also have regard to the targets and standards set out in the "Quality Housing for Sustainable Communities

The Schedule of Areas and Housing Quality Assessment prepared by Meitheal Architects which accompanies this application addresses this requirement.

Guidelines", DCHLG (2007) with regard to minimum room sizes, dimensions and overall floor areas when designing residential accommodation.

All applications for residential development shall include a phasing plan. Phasing proposals shall ensure that open space and infrastructure to serve dwellings in a given phase for example public lighting, footpaths, and community facilities such as crèches and playgrounds are completed to the satisfaction of the Planning Authority prior to the initiation of the succeeding phase.

1.5.4.13 Phasing

The Council will require a detailed phasing plan to be submitted with any planning application for residential or mixed-use development. The Phasing Plan shall indicate how each phase shall be completed satisfactorily, in terms of roads/lighting/landscaping, etc. prior to an additional phase commencing.

The enclosed Phasing Site Plan prepared by Meitheal Architects and CEMP prepared by MWP Consulting Engineers address this requirement.

1.5.4.1 Pedestrian & Vehicular Movement

- All new development will be required to maximise permeability and connectivity for pedestrian and cyclists and to create direct links to adjacent roads and public transport networks in accordance with the provisions of the 'Urban Design Manual – A Best Practice Guide' (2009), 'Sustainable Urban Housing: Design Standards for Apartments' (2018) the 'Design Manual for Urban Roads and Streets' (DMURS, 2019) and the Permeability Best Practice Guide (2015).
- Where new developments are proposed adjacent to existing and established neighbourhoods, the design, layout and housing mix should be designed in a such a way to enable positive integration, both physically and socially towards building strong

A Traffic and Transport Assessment prepared by MHL Consulting Engineers accompanies this application and indicates that all these requirements are fully addressed.

integrated communities and social cohesion.

- Movement should be convenient, safe and pleasant. Within larger housing areas, a clear hierarchy of spaces and roads should be apparent. Movement through estates should be guided by the principles of security, with opportunities for crime and anti-social behaviour minimised.
- Every effort should be made to eliminate through traffic (rat-runs); however, provision should be made for public transport, pedestrian, and cycle network through routes.
- Provision should be made for traffic management proposals in all developments. Where shared surfaces are proposed, vehicle design speeds should be at or near walking pace. This shall be achieved by design features such as curves, ramps, pinch points and other features where appropriate.
- Ensure there is adequate infrastructure provided in new development to support people in making the choice to adopt active travel is important to achieve the aspirations of the policy objectives set out in Chapter 14, Connectivity.

1.5.4.2 Estate Design

Planning proposals for housing schemes are required to present a considered design approach to tailor the scale, design, layout and density of housing in responding to the individual character of the respective town or village. In particular the design should:

- Incorporate corner sites, dual aspect designs and avoid blank facades into residential schemes, where possible, to ensure provision of active and

The Architectural Design Statement prepared by Meitheal Architects and the Landscape Design Report prepared by Simon Ronan Landscape that accompany this application address these requirements.

passive surveillance over street frontages, creation of attractive thoroughfares by avoiding spanning rear garden walls, the creation of more recognisable routes and junctions that aid navigation and contributing energy efficiency advantages, whilst providing for more attractive, usable and adaptable living spaces, and better sunlight/daylight provision to its occupants.

- Support the play and recreational needs of children and young people and ensure the central integration of play provision and child-friendly neighbourhoods and the needs of older people and of persons with a disability.
- Reflect and contribute to the local character, materials and identity of place into the design of new developments.

1.5.4.3 Climate Resilience

Innovative energy efficient housing is required to accommodate new typologies and provide adaptable and/or whole life-cycle homes to create inclusive and socially balanced residential communities. Applicants will be required to demonstrate how climate resilient features have been incorporated into the design of new residential developments and outline how:

- High quality landscaping (including tree planting), that make use of a diverse range of species of plants – consistent with the National Pollinator Plan, site appropriate and irrigated by rainwater.
- Incorporating a green infrastructure network and Nature-Based Solutions (NBS) into the design of buildings and layout – living/green walls, rain gardens, bio-retention measures/swales living/green and or

The Climate Action and Energy Report prepared by DK Partnership and the Landscape Design Report prepared by Simon Ronan Landscape which accompany this application address this requirement.

blue roofs, other soft Sustainable urban Drainage Systems (SUDS) measures such as swales, rain gardens, using trees for urban cooling and the reduction of wind tunnel effect.

1.5.4.4 Public Open Space

Public open space should be provided at a minimum rate of 15% of total site area. The open space should be designed to complement the residential layout and be informally supervised by residents. The spaces should generally be centrally located within groupings, and be visually and functionally accessible, of a suitable gradient, useable and overlooked by a maximum number of dwellings. Incidental pieces of unusable land shall not be considered to fulfil or partially fulfil the 15% requirement; for example, narrow tracts of open space, which are difficult to manage, will not be acceptable.

In brownfield sites or infill sites, a minimum of 10% may be provided as public open space. Residential developments of 5 units or less may be exempt from the 15% open space provision on greenfield sites. The Council will determine on a case-by-case basis where it is demonstrated that the function of the space is not viable.

In addition to private open space, provided by the Developer, communal open space must also be provided for apartments, in accordance with the minimum standards set out in 'Sustainable Urban Housing, Design Standards for New Apartments' Section 28 Guidelines, (2020). Communal open space is for the exclusive use of the residents of the development and should be accessible, secure, and usable outdoor space which is inclusive and suitable for use by those with young children and for less mobile older persons.

The Council shall require that areas dedicated for public open space in a planning application are transferred to the ownership of the Council where the development is taken in charge by the Council.

As outlined in the Schedule of Accommodation prepared by Meitheal Architects and the Landscape Design Report prepared by Simon Ronan Landscape, the provision of 11.5% public open space is an integral element of the design and to a large extent, the site layout is derived from the concept of delivering a network of outdoor space for pleasure and activity across the scheme.

Children's play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhoods proposed within this design. Public space is clearly defined throughout the design. Please refer to enclosed Landscape Plan produced by Simon Ronan Landscape for details.

This requirement is fully addressed in the design.

1.5.4.5 Landscape Plans

- *A detailed Landscaping Plan, prepared by a suitably qualified professional, is required to accompany any new housing scheme proposal of 10+ residential units or as required by the Planning Authority.*
- *The landscape plan will set out and specifically indicate how the overall approach is infrastructurally and ecologically resilient and provides varied landscapes that reflect the character of the area; it should also address the following:*
 - *Ecosystems services and carbon capture approach*
 - *Green and blue infrastructure integration and linkages*
 - *Urban Greening*
 - *Biodiversity including pollinator friendly approach*
 - *Nature based solution to hard infrastructure, including the provision of SUDs*
 - *Maintenance without the use of chemicals*
 - *Nature Based Play*

This requirement is fully addressed in the Landscape Design Report prepared by Simon Ronan Landscape.

1.5.4.6 Private Open Space

- *All houses should have an area of private open space of a suitable gradient, exclusive of car parking, to the rear of the building line. The minimum area of private open space*

Meitheal Architects have prepared an Architectural Design Statement which accompanies this application and indicates that the private open space of all houses meets the Compact Settlement Private Open Space minimum requirement. Furthermore, all houses meet or exceeds the CDP minimum private open space requirement as set out in Table 1 of the CDP.

Similarly, all apartment units meet the requirement set out in the Apartment Guidelines 2025.

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

Table 1: Minimum Private Open Space Requirements for Dwelling Unit

to be provided shall be in accordance with Table 1 for all new residential units.

- *The prescribed private amenity space will allow for a private amenity area, which can accommodate the storage of bins/garden shed etc, and the provision of an area for vegetable growing, etc. Reduced quantum may be considered in respect of well-designed high-quality development where it can be demonstrated by the applicant the space is usable, appropriately located & shaped and of high quality*
- *It should be noted that housing developments which provide private open space at the minimum standard throughout the scheme will be discouraged.*

1.5.4.7 Privacy

Privacy is an essential factor in residential layout. Privacy can be ensured by attention to the alignment of new residential buildings and their relationship to each other. Good design in housing layouts, the configuration of houses and their relationship to each other, to open spaces and roads, should aim to provide layouts with adequate private open space and screening so as to achieve freedom from observation.

The arrangement of dwellings within the proposed residential development meets the requirement of this objective and safeguard privacy and avoidance of overlooking. Please refer to enclosed Site Layout Plan prepared by Meitheal Architects.

1.5.4.8 Maximum Site Coverage

Site Coverage is determined by dividing the total area of ground covered by buildings, by the total ground area within the site (i.e. footprint of development/Area of site). A maximum of 85%, or up to the existing site coverage (brownfield sites) will be allowed for urban areas, and 65% site coverage other areas in rural areas ('one-off' housing).

As outlined in the accompanying Housing Quality Assessment prepared by Meitheal Architects, the total net residential area for the site constitutes 0.5ha of a total site area of 2.53 hectares, excluding public/private open space areas, landscape corridors and required circulation space. This site coverage of 0.198 (19.8%) is less the maximum figures set in the CDP.

1.5.4.9 Building Height

As set out in section 3 of this document, the proposed building height range is in line with the Ministerial Guidelines.

Development proposals for higher buildings in proposed residential development, need to take account of the

Development Management principles and satisfy Development management criteria as contained in the

Ministerial Guidance document Urban Development and Building Heights (2018).

1.5.4.10 Minimum Separation Distance

Between directly opposing above ground floor windows (first floor), a separation distance of 22 metres should generally be observed for new, reciprocal overlooking housing, although this will also be informed by considerations such as typography, design, and housing type and mix.

Innovative dwelling types, such as houses which have their main sleeping and living areas on one side, and circulation and bathrooms on the other, may allow for a reduction in this standard. Any window proposed at ground floor level should not be less than 1m from the boundary it faces.

Adequate separation distances, between directly opposing rear first floor windows, should be provided when extending existing dwellings at first floor level, to ensure the retention of adjoining residential amenity.

For single storey dwellings, a reduction in the rear garden depth may be considered, subject to the protection of adjoining residential amenity.

A minimum of 2.2 meters shall be provided between the side walls of detached, semi-detached and end of terrace dwellings to ensure privacy and ease of access.

We note that the 2024 Guidelines for Sustainable Residential In line with the Sustainable and Compact Settlements Guidelines for Planning Authorities 2025, all units achieve the required separation distances between buildings.

1.5.4.11 Screen Walls in Urban Areas

Screen walls constructed of brick/ stone/ rendered blockwork, 1.8 metres in height, and constructed in accordance with current standards and regulations, shall be provided to enclose private open space and where the boundaries of the house sites abut roads, pedestrian ways or open spaces. The walls shall be capped and plastered on the public side, and

Simon Ronan Landscape Architects enclosed material includes suitable landscaping provisions to address this development management standard.

the design and finish should be consistent with the design/finish of the house design.

Concrete post and timber/ concrete panel fencing may also be permitted for inter-site, side boundaries boundary treatment.

A uniform treatment for the boundaries of individual sites, which is capable of providing adequate privacy between properties, shall be implemented throughout a residential development.

Boundaries located to the front of dwellings should generally consist of softer, more open boundary treatments, such as low-level walls/railings and/or hedging/planted treatments. Open plan gardens will not be allowed on main access roads.

Rear boundary walls or fences must generally be provided to a height of not more than 2 metres.

1.8m side Garden walls should generally be presented behind the front building line of the dwelling only, to allow for the openness of residential development and to protect visual amenities; lower-level walls may extend forward of this line.

Boundary walls/enclosures should not present blank spanning facades onto thoroughfares. Design solutions may include the use of alternative site orientation and/ or dual aspect dwellings, including provision of side access/ egress arrangements.

1.5.4.12 Waste Management

- *An appropriately designated and screened refuse storage and collection points, including provision for recycling and composting storage, should be provided.*
- *Access to these areas and roads within the estate should be suitable for waste collection vehicles.*
- *In the case of communal refuse, recycling and composting storage, the collection point should be accessible both to the waste*

The design of the proposed bin store as indicated in the enclosed drawings prepared by Meitheal Architects fully conforms to this requirement, as does the apartment bin storage area in the floor plan.

<i>collection vehicles and to the resident and be secured against illegal dumping by non-residents.</i> <i>Refuse storage areas should not be located immediately adjacent to the front door or ground floor window(s) unless adequate screened alcoves or other such mitigation measures are provided.</i> <i>For individual houses, the applicant/ developer must identify the proposed location and design of bin storage to serve each dwelling.</i>	
1.5.4.13 Phasing <i>The Council will require a detailed phasing plan to be submitted with any planning application for residential or mixed-use development. The Phasing Plan shall indicate how each phase shall be completed satisfactorily, in terms of roads/lighting/landscaping, etc. prior to an additional phase commencing.</i>	A Construction Environmental Management Plan prepared by MWP Consulting Engineers accompanies this application and details the proposed phasing of the development.
1.5.4.14 Services <i>Provision shall be made for the location of all services underground. Water mains, foul and storm sewers shall be laid, where possible, under the estate roadways. 10m wayleaves shall be provided for underground public services in private areas.</i>	The Infrastructure Report prepared by MWP Consulting Engineers outlines the services details provided in accordance with this requirement.
1.5.4.16 Construction Waste Management Plan <i>A management plan for the reuse, recycling or disposal of Construction & Demolition waste will be required to be submitted as part of an application.</i>	A CEMP and Resource Waste Management Plan (RWMP) prepared by MWP Consulting Engineers accompany this application in accordance with this requirement.
1.5.5 Apartment Design Standards – requirement to comply with Apartment Guidelines	As set out in Section 3 of this document the apartment/maisonette units have been designed in full compliance with the Apartment Guidelines. The accompanying Housing Quality Assessment prepared by Meitheal Architects, indicates that all apartments are in excess of the Apartment Guidelines minimum requirement in

	terms of floor areas, dual aspect requirement, communal open space and floor to ceiling heights.
Section 1.20.7.1 <i>set out that in multi-unit residential development EV parking at a minimum of 1:5 car parking spaces should be provided.</i>	In relation to the parking provision for the apartment within the scheme, as indicated in the EV Parking Strategy Drawing prepared by Meitheal Architects the appropriate EV parking quantity is provided for the development.

5.2 Kenmare Municipal District Local Area Plan 2024 – 2030 (LAP)

The Kenmare Municipal District Local Area Plan 2024 – 2030 (LAP) is the statutory planning policy framework for Kenmare town. The LAP outlines the Council's policies and objectives for the development of Kenmare town. Its vision is *'to enhance its position as a tourist destination and historic town that is competitive nationally and internationally in attracting investment, talent, enterprise and visitors...attracting new residents, visitors and national and international investment. This will be achieved through increased high-quality employment spaces, residential opportunities and the development of an excellent quality environment'*.

The LAP notes that wastewater treatment capacity was a critical, long standing infrastructural issue that curtailed the town's development potential. With this infrastructure constraint now resolved the LAP envisages that the town can expand to achieve its potential as a major tourist destination.

Policy	Consistency of Scheme
KENMD-KE-1 <i>Sustainably plan for and facilitate the continued regeneration and renewal of the Town Centre's streets, public realm spaces, including squares, parks, nodes, walkways and greenways in order to revitalise it as a prosperous, vibrant, attractive location in which to live, work, learn and visit.</i>	The proposed development is consistent with all strategic aims and zoning objectives in the LAP. The subject site is located within the development boundary of Kenmare, within walking distance of the town centre and is zoned for 'Residential' use with a specific land use zoning 'R1 New/proposed Residential Phase 1' for most of the area. Additionally, areas of 'M4 Built Up Area' and 'S1 Education' are located in proximity. The LAP Indicative Walkway Objective through the subject site will be delivered by the Proposed Development, contributing towards the improved connectivity of the site with the town centre.
KENMD-KE-16	As set out in the Landscape Design Report prepared by Simon Ronan Landscape, in addition to the above-mentioned linkage, the proposed development will provide benefits to the

<i>Ensure that development proposals would not have a significant adverse impact on the SAC and Amenity Areas in and around the town.</i> KENMD-KE-24 <i>Establish a sustainable network of interlinked green areas / parks with interlinking cycle / walkways.</i>	environment and residents alike. Blue and green infrastructure comes together to help create healthier and more resilient communities, reduce the environmental impacts, and enhance the quality of life for residents.
KENMD-KE-30 <i>Ensure that no additional surface waters will be allowed to discharge to foul sewers or combined sewers and surface water from new developments will be designed in accordance with the principles of attenuation and controlled discharges (SuDS). Where feasible nature-based solutions shall be utilised.</i> KENMD-KE-32 <i>Protect the town's existing floodplains and wetlands from inappropriate development in recognition of their function as attenuators and conveyors of flood water.</i> KENMD-KE-33 <i>Ensure that all development complies with the Objectives contained in Section 2.9.2 of this Plan</i>	The proposed development is supported by a Site-Specific Flood Risk Assessment prepared by MWP Consulting Engineers (included in the Drainage Impact Assessment). The enclosed Drainage Impact Assessment includes details on proposed surface water management including SuDS measures.
KENMD-KE-35 <i>Promote a more pedestrian and cycling friendly environment, to improve movement and access throughout the town, through the provision and improvement of pedestrian and cycling infrastructure and traffic calming measures, subject to environmental assessments.</i>	The LAP Indicative Walkway Objective through the subject site will be delivered by the Proposed Development, contributing towards the improved connectivity of the site with the town centre. The Proposed Layout includes for the upgrade to the cycling infrastructure in the vicinity.

5.3 Kerry County Council – Local Authority Climate Action Plan 2022-2029

The Kerry County Council Local Authority Climate Action Plan was adopted in January 2024. Its vision is that *'Kerry will meet the environmental, economic and social challenges of climate change. Through Just Transition, the county will adapt to a decarbonised, climate neutral, resilient and biodiversity rich future. This will be achieved by protecting our environment and building strong partnerships and collaborations with our communities'*.

Policy	Consistency of Scheme
The Climate Action Plan Objectives for Kerry include the following: <i>EG1 - Promote climate action projects that support and maximize environmental co-benefits, such as biodiversity protection and enhancement; improved air, water or soil quality; or enhanced recreation, amenity and cultural heritage value, to ensure win-win benefits are gained.</i> <i>EG2 - Support or facilitate climate action related projects and initiatives which seek to make improvements in soil structure, management and health by increasing soil organic carbon - which will create the environmental co-benefits of improving flood resilience by enhancing water holding capacity of soils and increasing the level of GHG sequestration associated with land use functions.</i> <i>EG3 - Ensure all development underpinned or supported by climate action is planned and implemented in a manner that appropriately considers the potential for environmental co-benefits, potential environmental impacts and environmental protection requirements. No climate action related development project that is likely to have significant negative effects on the receiving environment shall be supported.</i> <i>EG4 - Flood projects, or related maintenance works, shall be carried out in a manner that promotes climate action-biodiversity related co-benefits, and shall have due regard for the protection and enhancement of rare, protected or important habitats and species.</i> <i>EG5 - Ensure climate action related projects are carried out in a manner that promotes climate action-cultural heritage co-benefits, and do not result in unauthorized physical damage to cultural, archaeological or architectural features, or unauthorized or inappropriate alteration of the context of sensitive cultural heritage features.</i>	The proposed development is consistent with EG1 as the design has been shaped to protect sensitive biodiversity. The layout design includes a number of features to enhance water holding capacity. The application is accompanied by an EcIA, NIS and EIA screening which all consider the potential environmental impacts arising from the proposed development. As noted above and in the enclosed EcIA and NIS, the proposed development has been carefully considered across a range of aspects to ensure that nearby habitats are protected. The proposed development is in accordance with EG5, archaeological features on the site will be preserved and protected during the development of this site. An Archaeological Impact Assessment is provided as part of the application for this site. As outlined in the enclosed ecological material the proposed development is aligned with the provisions of the WFD and the RBMP. The proposed development has been landscaped since its inception, and the retention and bolstering of treelines and hedgerows has been prioritised where possible. Key to the site's development is the biodiversity currently existing on the site. The proposed planting regime enhances existing ecological connectivity.

EG6 - Ensure climate action related projects are carried out in a manner that promotes climate action water quality co-benefits, and align with the provisions of the Water Framework Directive and relevant River Basin Management Plan.

EG7 - Promote climate action projects that support protected trees, hedgerows and other habitats such as wetlands, flood zones which contribute to green infrastructure.

EG8 - Support opportunities to improve ecological connectivity of non-designated habitats and sites to improve overall ecosystem resilience and functioning while supporting climate action within the county.

EG9 - Ensure all projects supported by the council have taken the necessary precautions to identify and manage invasives species, particularly with regard to Schedule III species. no climate action related development project that is likely to cause the spread of invasives species listed in Schedule III shall be supported.