

Planning Statement

Proposed Large-scale Residential Development, Ardshanavooly (townland), Killarney, Co. Kerry.

Client: Ross-Park Residential HS Limited

September 2026

Connecting people.
Connecting places.

Contents

Introduction **4**

1.1 Purpose of Statement 4

1.2 Development Context 4

Site Context **5**

2.1 Site Location 5

2.2 Site History 6

2.3 Proposed Development 6

LRD Opinion **9**

3.1 LRD Opinion 9

3.2 Other Items 9

3.3 Summary 13

Planning Assessment **15**

4.1 Principle of the Development 15

4.2 Compact Development 16

4.2.1 Density 16

4.3 Connectivity 17

4.4 Traffic & Access 18

4.5 Ecology 20

4.5.1 Ecological Impact Assessment 20

4.5.2 Appropriate Assessment 20

4.6 Archaeological and Cultural Heritage 21

4.7 Environmental Impact Assessment 21

4.8 Water Framework Directive Assessment 22

4.9 Visual Impact 22

Conclusions **24**

Appendix A: Connectivity Map **25**

01 //

Introduction

1.1 Purpose of Statement

This Planning Statement has been prepared on behalf of Ross-Park Residential HS Limited and accompanies a planning application on lands located at Ardshanavooly (townland), Killarney, Co. Kerry for a Large-scale Residential Development of 188 no. units.

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

1.2 Development Context

Ross-Park Residential HS Limited are seeking permission from Kerry County Council for a proposed Large-scale Residential Development (LRD) located on Ardshanavooly (townland), Killarney consisting of construction of a residential development of 188 no. residential units with ancillary creche, landscaping and all associated site development works.

The proposed development includes the construction of 120 no. two and three storey houses comprising of 53 no. townhouse units (37 no. 3-bed units, 16 no. 4-bed units), 48 no. semi-detached units (30 no. 3-bed units, 18 no. 4-bed units), 19 no. mews houses (19 no. 2-bed units), and 68 no. apartments in 2 no. four storey blocks (36 no. 1-bed units, 32 no. 2-bed units).

Vehicular access to the proposed development will be via the proposed Killarney Strategic Links Project - Links Road A-C, part of which will be delivered by the proposed development. The design includes short and longer term future accesses reflecting the phased delivery of Links Road A-C, as well as pedestrian/cycle infrastructure to/from Friary Downs / the R876 to the south and internally within the development site and to adjoining areas.

Ancillary site works include car parking, provision of bicycle parking and bin storage facilities serving the proposed apartment/courtyard apartment buildings and creche, 1 no. ESB substation, landscaping, water services and drainage infrastructure and all associated site development works.

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

02 //

Site Context

2.1 Site Location

The subject site, which is c.3.8 hectares in area, is located in the townland of Ardshanavooly, Killarney in an area characterized by existing residential and employment uses. The site represents an infill greenfield site that is bound to the west and south by existing residential developments and the Deerpark Retail Park to the east. The Deerpark Pitch and Putt Club bounds the site to the north with other undeveloped field parcels to the northwest and northeast. The accompanying Site Layout Plan prepared by Reddy Architecture provides further detail of the proposal in relation to its immediate context.

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



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

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

Strategically, Killarney is a principal driver of economic growth in County Kerry and wider South West Region. It is a market leader in tourism, specialized engineering and the knowledge economy with a job to resident worker ratio of 1.25 which is higher than the Southern Region's average of 1.06. The Kerry County Development Plan 2022 (CDP) which came into effect in August 2022 categorizes Killarney as one of the two Key Towns in the county and identifies a population growth projection of 1,630 persons in Killarney by 2028, 17% of the total envisaged population growth of the county. Table 3.7 included in the CDP calculates the housing requirement to meet this population target for Killarney as 1,277 units.

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

2.2 Site History

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

2.3 Proposed Development

The applicant is seeking planning permission for the provision for 120 no. two and three storey houses comprising of 53 no. townhouse units (37 no. 3-bed units, 16 no. 4-bed units), 48 no. semi-detached units (30 no. 3-bed units, 18 no. 4-bed units), 19 no. mews houses (19 no. 2-bed units), and 68 no. apartments in 2 no. four storey blocks (36 no. 1-bed units, 32 no. 2-bed units).

Total Residential Units	**188**
Houses	
2 Bedroom	19
3 Bedroom	67
4 Bedroom	34
Apartments	
1 Bedroom Apartment	36
2 Bedroom Apartment	32

Vehicular access to the proposed development will be via the proposed Killarney Strategic Links Project - Links Road A-C, part of which will be delivered by the proposed development. The design includes short and longer term future accesses reflecting the phased delivery of Links Road A-C, as well as pedestrian/cycle infrastructure to/from Friary Downs / the R876 to the south and internally within the development site and to adjoining areas.



Figure 2-2: Proposed Site Layout Plan, highlighting Links Road A-C

Ancillary site works include car parking, provision of bicycle parking and bin storage facilities serving the proposed apartment/courtyard apartment buildings and creche, 1 no. ESB substation, landscaping, water services and drainage infrastructure and all associated site development works.

Key Site Statistics	
Total Site Area (ha)	3.8 ha 3.5 ha (developable area)
Density (units per ha)	53.7 units per ha (net)
Open Space Provision (%)	10.6 %

Car Parking Provision	223 spaces
Bicycle Parking Provision	141 spaces

The proposed development has been designed in accordance with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities. The scheme will deliver a development density of 53.7 units per hectare in support of the achievement of compact growth. The rationale for this figure is set out in Section 4 of this statement. The scheme will deliver 10.6% of public open space, alongside the private and communal open space. Through the formal application process, Kerry County Council have confirmed that the ministerial guidelines take precedence over any existing, now outdated, development management objectives, in respect of principal design matters.

03 //

LRD Opinion

3.1 LRD Opinion

On the 13th April 2026 Kerry County Council held a Section 32 LRD Meeting with the design team to discuss the proposed development. Subsequently, on the 28th April 2026, the Council issued their formal Section 32 LRD Opinion that proposals constituted a reasonable basis to make the full application:

I refer to LRD Meeting held in Killarney Town Hall on 13/04/2026.

Having regard to:

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

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

Kind Regards,

AO Planning

3.2 Other Items

The Opinion was accompanied by Kerry County Council's minutes of the meeting, the key points of which are replicated below alongside responses from Applicant's Design Team. The responses below should be read alongside the response letter from Malachy Walsh & Partners Consulting Engineers, and Section 1 of the submitted Architectural Design Statement, which responds to design items raised.

Area Planner

(a) The entire site is now zoned Proposed Residential since the adoption of Variation No 2 of the Kerry County Development Plan 2022-2028.

Noted. The principle of development remains supported on the subject lands.

(b) The density is considered to be appropriate to this "urban neighbourhood" type development.

Noted and welcomed.

(c) Proposed Mews Units on southern side of junction of service road with Link Road is a welcome aspect of the overall development. Suggested that this layout should be mirrored on the northern side of the junction.

The applicant has incorporated this request placing mews houses on either side of the access street and fronting the link road.



Figure 3-1: Proposed Mews Houses Presentation onto Links Road A-C

(d) The treatment of the rear boundaries of the semi-detached dwellings along the northern section of the site onto the Inner Relief Road should be closely considered.

The rear boundaries in question have been subject to detailed consideration and it was agreed that a concrete block wall would be constructed to the rear of units 84 – 90.

(e) Apartment Blocks are close to the boundary with the Deerpark Retail Park. Re-design should be considered.

As per the submitted plans, the location and configuration of Blocks A and B have been reviewed, with the offset to the adjacent commercial area increased in areas. The location of apartment blocks adjacent to retail areas is common in urban areas, with the combination of unit design, setbacks and landscape and boundary treatments considered an appropriate response to context in the subject case.

(f) The elevations of the apartment block especially onto the Inner Relief Road need further consideration.

Per the revised plans, the western elevations of the blocks have been updated to provide for additional design detail, active presentation onto and passive surveillance of the relief road.

(g) Query in relation to location of proposed creche and the requirement of creche traffic to enter the residential area and the lack of an adequate drop off.

Further to review, consideration was given to creating another access point from the relief road. This was discounted following review by the traffic engineer amid concerns that it could lead to a proliferation of entrances to/from the relief road over a short stretch. In response, the existing parking layout has been revisited to provide for dedicated end of road drop off and secure parking. The location of the creche is considered optimal from a design perspective providing for high visibility, natural light and a generous outdoor amenity space.

(h) Query on pedestrian and cycle connectivity with the existing estates to the west and with the proposed LRD to the west of the site.

The proposed development has actively considered interactions with adjacent housing schemes. A primary driver of the layout is the configuration of the relief road and the need to positively address same. The scheme will integrate positively with the under construction scheme to the south and the adjacent LRD

proposal. Provision has been made for an additional pedestrian connection to that scheme as part of the updated layout.

(i) Applicant should be aware of submission made in relation to planning application for LRD on the adjoining site to the west by Dept of Housing, Local Government and Heritage regarding storm overflow discharges to Ross Bay.

The Applicant has reviewed the submission in question on the site. The approach to drainage design ensures there is no additional runoff from the site to the combined sewer locally. All runoff generated within the development will be attenuated and discharged to ground via infiltration systems, thereby promoting groundwater recharge. No surface water outfall or discharge to adjacent lands, watercourses, or public drainage infrastructure is proposed, ensuring that all stormwater remains within the site boundary.

Municipal District Engineer

(a) Traffic model for Park Road Junction - model should be expanded to consider the wider area.

The requirements of the Council in respect of additional modelling was confirmed with the Engineers office. Two additional junctions were modelled locally, as presented in the submitted Traffic and Transport Assessment by MHL Consulting Engineers.

(b) Stormwater drainage pipe, diameter 450mm, must be provided from west to east

At the request of the Council, provision has been made for this pipe.

(c) Pedestrian and cyclist connectivity must the designed to link with the proposed residential development on the adjoining site to the west.

The proposed development includes pedestrian and cycle links to the adjacent Ardshanavooly LRD. Provision is made for two points of connection north and south of the proposed public open space in the northwest of the site. These potential connections can be formalized in discussion with Kerry County Council and adjacent landowners as required in the future.



Figure 3-2: Proposed Potential Future Connections to Adjacent LRD SIte

(d) Boundary treatment to rear of proposed houses backing on to proposed A-C Road should be agreed with KCC prior to submitting planning application.

The proposals for the boundary treatment were shared with the Council ahead of submission of the application.

(e) Strategy for building A-C Road to be agreed with KCC.

The building of the relief road component within the subject site will be agreed in full with Kerry County Council and the National Roads Office ahead of construction. The Applicant's design team have and continue to engage with the Council on the provision of this important infrastructure.

(f) Comments of Killarney MD Engineer compiled after the meeting.

All feedback provided has been reviewed and considered by the design team in the finalisation of the proposed design.

Housing Department

Housing Dept satisfied with applicant's proposal for apartments to be put forward to meet Part V obligation.

Noted and welcomed by Applicant.

Environment Department

(a) A CEMP should be submitted with the planning application.

As requested, a Construction and Environment Management Plan (CEMP) has been submitted with the application.

(b) If excess soil arises from the development, proposals for deposition off-site should be submitted.

As per the submitted CEMP, all excavations and earthworks to be carried out in accordance with BS6031:2009 Code of Practice for Earthworks. Soil handling, extraction and management shall be undertaken with regard to best practice guidelines such as Guidance on the Waste Management (Management of Waste from the Extractive Industries) Regulations 2012. It is not envisaged that there will be a requirement for any significant offsite removal of soil. Where required, the approach to same will be agreed with Kerry County Council.

(c) Refuse storage facilities should be designed for the development.

The proposed development includes requisite designed refuse facilities, The application documentation includes a Preliminary Operational Waste Management Plan.

Housing Estates Unit

(a) T-junction design preferable to Y-junction design for service roads.

Junction arrangements have been reviewed by designers in accordance with the above.

(b) Safety barriers should be provided on top of retaining wall.

This approach has been adopted, where relevant.

(c) Adequate sightlines must be demonstrated at all internal junctions.

The design has been reviewed for compliance with DMURS and sightline standards and is compliant.

(d) Childproof weldmesh fencing, 1.5m high, must be provided on the development side of existing sod and stone boundary fences which are being retained.

The approach to boundary treatments is set out in the submitted Landscape Boundary Treatment Plan (Drawing No. 24353-1-102). Provision is made for the requested 1.5 m high weldmesh fence.

(e) Signage and naming scheme for the development should be submitted.

Further to any grant of permission, a full signage and naming scheme for the development will be agreed with the Council.

<u>Other Feedback</u>

Further to the meeting with the Council, additional feedback / engagement was also completed with some other Departments.

Kerry National Roads Office

The approach to the delivery of the link road has been discussed and agreed with the NRO. The adjacent development to the south (planning reference 23991) is required by way of condition to construct their section of the link round to the Applicant's boundary. This is being progressed to allow for release / occupation of units under that governing permission, and further to any grant of permission on the subject lands, the Applicant is fully committed to building the next section of the road consist with the discussed and agreed requirements of the roads office. All feedback has been integrated into the road design.

Flooding Coastal and Marine Unit

This Council department confirmed that is in Flood Zone C as defined in the Flood Risk Management Guidelines and is suitable for residential development in terms of the flooding guidelines. It was requested that a Site-Specific Flood Risk Assessment Report and Engineering Assessment and Drainage Design report be prepared. These have been submitted. It was also agreed that A fully developed Maintenance Plan and Schedule for the storm drainage and SuDS infrastructure be provided to the Council prior to commencement of construction.

County Archaeologist

It was acknowledged that a programme of pre-development archaeological testing was completed under licence, with the subsequent assessment submitted to the County archaeologist. It was further noted that no archaeological or potential archaeological features or strata were encountered during the archaeological testing and that there are no archaeological constraints identified.

Environmental Assessment Unit

Per engagement, connection to municipal drainage infrastructure will be in accordance with Uisce Eireann requirements. The scheme includes detailed nature-based solutions to surface water drainage in line with that requested by the Environmental Unit. The design ensures that surface water will be attenuated within the red-line boundary of the site. Notwithstanding this, we understand from discussions with the Council that they are rolling out a programme of works to separate out combined sewer in the local area. The Applicant has agreed in principle to support these works by way of a proportionate development contribution.

An arborist report was completed on site and informed the design approach to tree removal / retention. Construction stage protection measures are provided for in the design.

No bat roosts have been identified on site, as informed by ecological survey work, and there is no requirement for a derogation license.

Boundary treatments are clearly outlined in the submitted landscape and architectural plans. The scheme includes meaningful biodiversity enhancement measures as integral part of design.

Building Control and Fire Department

Roadway widths have been designed to cater fire truck access requirements, having regard to DMURs guidelines, and as evidenced by submitted autotrack analysis. The updated layout makes provision for hammer heads turning areas for fire and refuse trucks. Provision is made for 5% disability access parking spaces as requested. The creche includes dedicated set down area and car parking. The proposal has been designed to meet childcare needs on site. Similarly, the scheme includes an appropriate quantum of EV parking spaces at 20% of development.

The development is proposed to be ICF Construction. All certification and product sheets will be provided as part of the commencement notice process before construction commences.

3.3 Summary

In conclusion, the Council issued opinion has been reviewed by the design team. Follow up meetings have taken place with key personnel. The specific points raised by the Council have been addressed in this statement and wider application reporting / plans.

The Applicant strongly believes that the proposed layout and design is the appropriate one for site. The layout and design have been developed in close discussion with the Council and provides for compact growth and high quality place-making. A landscape-led approach to design has been taken. The amount of hedgerow removal has been minimized and a significant suite of compensatory planting is proposed to offset the loss necessary to delivery new homes, as envisaged by the site zoning objective. It has been demonstrated that the project will contribute positively to biodiveristy net gain.

The project will be constructed in a sensitive manner having full regard to any other schemes under construction at the time in the local area. The prepared Construction and Environment Waste Management Plan will be a living document, prepared and reviewed with the Council on a periodic basis, as required. It has been demonstrated that the proposed development will not give rise to any significant impacts, rather it will deliver new homes in a high quality environment, in full accordance with the proper planning and sustainable development of the area.

04 //

Planning Assessment

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

4.1 Principle of the Development

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

It is noted that the subject lands are largely zoned under 'R1 – New/Proposed Residential Phase 1' zoning in the adopted CDP. The objective for these lands is as follows:

> **R1 – New / Proposed Residential Phase 1**: *'For new residential areas/town extensions to ensure the provision of high quality new residential environments. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities. May also include a range of other ancillary uses for residential, particularly those that have the potential to foster the development of new residential communities.'*

The subject lands are also traversed by an indicative roads' objective in the KCDP, represented by KCDP Objective KA 82 which aims to:

> *'Support the development of the inner relief road from Deerpark to Loreto Road.'*

Volume 2, Appendix 6 of the KCDP provides a *'Settlement Capacity Audit'* for each main settlement in the County including Killarney. The subject lands are identified with land parcel K-9 in this Capacity Audit stating that the lands are 'Tier 1' lands with access to road access, footpaths, public lighting, foul/storm sewer infrastructure and water supply.

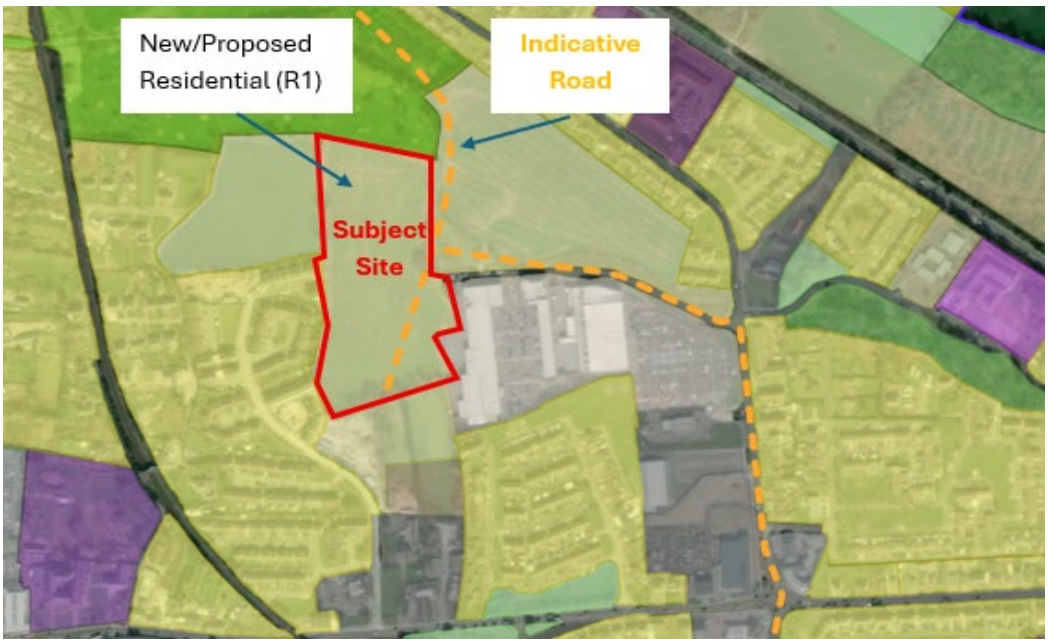


Figure 4-1: Site Zoning Context

During the Section 247 process with Kerry County Council, the local planning authority confirmed the principle of development on the subject lands was supported and would conform with the active land use zonings on the site.

4.2 Compact Development

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

4.2.1 Density

Based on the total site area of 3.8 hectares, the proposed 188 no. dwellings result in a proposed gross density calculation of 48.9 dwellings per hectare (dph). The proposed net density is 53 dph, when the area of the proposed distributor road is excluded.

Figure 4-2: Key Town Density Ranges - Extract from Table 3.5 2024 Guidelines

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

Key Town / Large Town - Centre and Urban Neighbourhood The centre comprises the town centre and the surrounding streets, while urban neighbourhoods consist of the early phases of residential development around the centre that have evolved over time to include a greater range of land uses. It is a policy and objective of these Guidelines that residential densities in the range 40 dph-100 dph (net) shall generally be applied in the centres and urban neighbourhoods.
Key Town / Large Town - Suburban/Urban Extension Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).

As outlined, Killarney is a 'Key Town' within County Kerry. Table 3.5 of the Guidelines (included here as Figure 3.2) sets out the density ranges for such locations, with the subject site meeting the definition of a

'Key Town/Large Town - Urban Neighbourhood. In accordance with the Guidelines, density ranges for developments in such areas should generally be between 40 dph to 100 dph (net) in such locations.

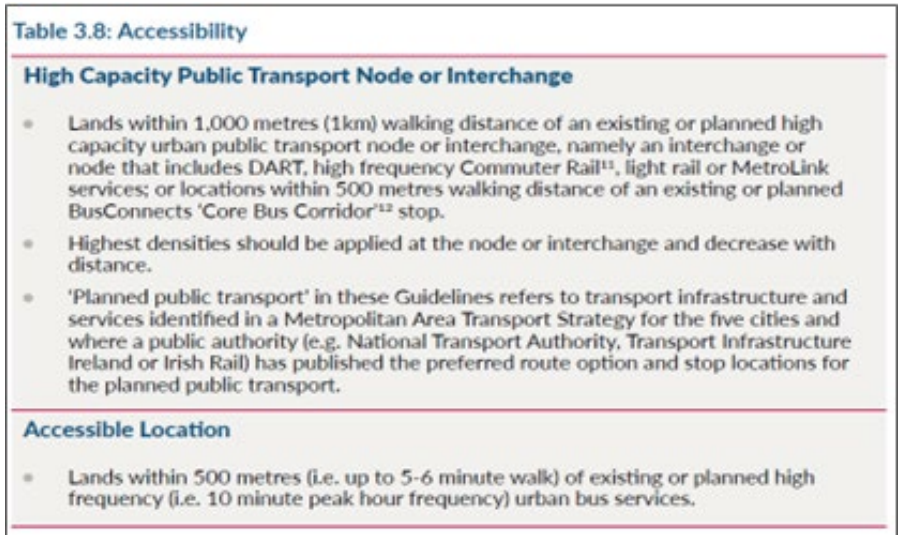


Table 3.8: Accessibility

High Capacity Public Transport Node or Interchange

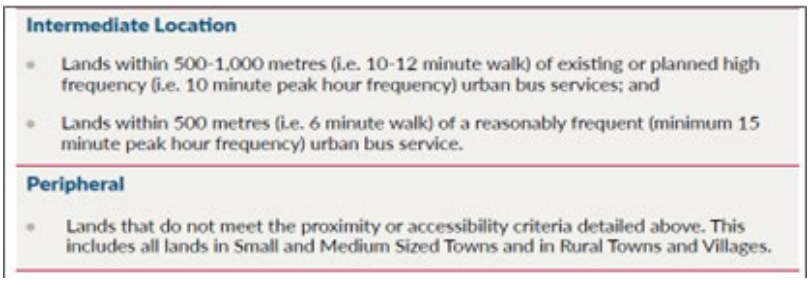
- Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail[11], light rail or MetroLink services; or locations within 500 metres walking distance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

Accessible Location

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

Figure 4-3: Accessibility Definitions - Extract from Table 3.8 2024 Guidelines

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



Intermediate Location

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

Peripheral

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

Figure 4-4: Location Definitions - Extract from 2024 Guidelines

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

We consider the proposed density net density of 53.7 dwellings per hectare is not only consistent with national and local objectives, but also compatible with the sites zoning objective, and the existing and evolving settlement pattern of the area.

4.3 Connectivity

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

The site is within general walking distance of Killarney Railway Station and Killarney Bus Station. As shown in **Table 1** below, Killarney Bus and Train stations provide multiple different route options for future residents of this development. Each of the below listed stops are located within 1.2km of the subject site and provide routes to different parts of County Kerry and to County Cork.

Table 1: List of Public Bus Stops and Services

Stop ID	Distance from site	Routes Available
Killarney Bus Station	300m	257, 271, 270, 279
Killarney Train Station	340m	A308, A311

As can be seen from the above, the subject site is serviced in regard of public transportation infrastructure. The nearest stop to the site is Killarney Bus Stop, which is serviced by the 257, 271, 270, and 279 bus routes. Killarney Train Station (c.340m) is located in close proximity to the subject development and is within accessible distance of the proposed development. In this regard, the proposed development can be seen to have an adequate provision of local, regional and national transport services conveniently available. The development aims to improve the level of service with the inclusion of a bus stop along the access road to the development, supported by pedestrian and cycle infrastructure.

Kerry County Council have recently upgraded the section of road between the Killarney Outlet Centre to the Aldi roundabout with new footpaths and cycle lanes. The proposed development will integrate positively with this, fostering uptake in use of new infrastructure and modal shift away from use of the private car.



Figure 4.5: Proposed Bus Stop / Cycle Infrastructure (Left) and Recent Upgrades on Park Road (Right)

4.4 Traffic & Access

A Traffic & Transport Assessment (TTA) has been prepared by MHL & Associates Limited Consulting Engineers. The scope of the TTA assesses 3 no. junctions in the vicinity of the site, specifically:

- Junction 1: The roundabout of R876/East Avenue/College Street.
- Junction 2: The Park Road/Friary downs priority junction.
- Junction 3: The roundabout of R876/Countess Rd/R876/Arbutus Dr.

The TTA sets out that the longterm access to this site will be via the proposed relief road (Killarney Strategic Links Road A-C), that will link the N22 with the R876. The applicant has liaised with Kerry County Council and Kerry NRDO with regard to the location of this infrastructure on the subject site. The proposed route has been agreed by all parties and has been incorporated into the proposed site layout for this site.

The TTA concludes that the proposal will have a negligible impact on Junctions 2 and 3, but it will add localised capacity pressure to Junction 1 during peak periods, which is already operating above its design capacity. This is the main junction to the west (R876/N71) into Killarney Town Centre. Due to the and proximity to the town centre and the urban nature of the site of both these junctions and the development, a certain level of congestion is to be expected during peak times and the proposed traffic volumes are considered within the norms of a busy urban environment. Alongside this, the provision of new homes and pedestrian / cycle infrastructure within a short walking distance of the town centre, as proposed, will have the positive effect of promoting active travel / modal shift away from private car usage. The proposal is fully in keeping with the policy sentiment on this as contained in the Ministerial Compact Settlement Guidelines.



Figure 4-6: Designed Immediate and Future Western Accesses

As noted, long-term access to the site will be via the proposed relief road (Killarney Strategic Road A-C). The proposed development will deliver a significant stretch of this road commensurate with site development, extending the under construction route from the south northwards. The main spine road (east/west) through the site is developed to connect to the adjoining Ardshanavooly LRD site to the east to

accommodate future access when the Killarney Strategic Road A-C is complete. A shorter-term access point into the western side of the subject site has been designed until the signalised junction is built.

MHL & Associates Ltd Consulting Engineers have also prepared a Mobility Management Plan (MMP) for the subject development. The MMP confirms that the site is well situated for the implementation of an MMP promoting alternative modes of transport especially when accessing local services. The design of the site encourages permeability and connectivity to the adjoining lands and areas.

4.5 Ecology

4.5.1 Ecological Impact Assessment

An Ecological Impact Assessment (EcIA) has been prepared by MWP, inclusive of dedicated bat surveys and reporting prepared by MWP. The bat report states that features within the site that are of potential use by foraging and commuting bats are hedgerows and treelines, which provide connectivity between the site and other foraging areas in the wider landscape. Overall, habitats occurring were assigned a suitability rating ranging between 'negligible', 'low', 'moderate' or 'high' for foraging and commuting bats.

As per the submitted EcIA, this project presents an opportunity to enhance the biodiversity value of the site. A series of compensation and enhancement measures have been incorporated into the landscape plan for the development (included with the planning application). These mitigation measures will contribute to maintaining ecological function at a local scale and provide long-term habitat value within an otherwise urbanised setting. The proposed enhancement measures include:

- Retention of existing boundary hedgerows and treelines where practicable, maintaining linear features used by birds, bats and small mammals
- Planting of native tree and shrub species within public open spaces and along internal roads to provide additional foraging and nesting habitat
- Incorporation of pollinator-friendly planting within landscaped areas using nectar-rich native and ornamental species
- Creation of structurally diverse green spaces with a mix of trees, shrubs and grassland areas to support birds, invertebrates and small mammals
- Integration of green corridors through the site via planted boundaries and open space areas to maintain local habitat connectivity
- Installation of integrated bat and bird boxes on suitable buildings and mature retained trees where feasible
- Sensitive lighting design to minimise light spill onto retained boundary vegetation

The EcIA concludes that taking account of the local ecological context, the limited ecological value of the majority of on-site habitats, the absence of designated sites within the footprint, and the standard mitigation measures proposed, that the development is not predicted to result in significant adverse effects on ecological receptors at a local, county, national or European level.

4.5.2 Appropriate Assessment

The application is also accompanied by an Appropriate Assessment Screening and Stage 2 Natura Impact Statement by MWP. It has been determined that the proposed development may, in the absence of mitigation measures, potentially lead to significant adverse impacts on the Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC.

Taking into account all matters discussed and provided that the mitigation measures and recommendations are adopted, it has been objectively concluded, following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts from the proposed LRD and with the implementation of the mitigation measures proposed, that the proposed LRD will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects, and there is no reasonable scientific doubt in relation to this conclusion.

4.6 Archaeological and Cultural Heritage

A review of the National Monuments Service (NMS) records indicates that there are no recorded monuments on the subject site. The CDP does not indicate that there are any Records of Protected Structures (RPS) on the site or in near proximity to the site. The closest recorded monument in the vicinity to the site is shown on the NMS Historic Viewer and is located 370 meters to the southwest of the redline of the subject site and is recorded as a 'Architectural fragment' (Ref. KE066-069----). There is a second recorded monument located 400m to the west of the redline boundary which is recorded as a 'Burial ground' (Ref. KE066-068002-).



Figure 4-7: Location of two monuments recorded on the NMS with the subject site outlined in red. Source: Laurence Dunne Archaeology, Archaeological Impact Assessment Report

Laurence Dunne Archaeology Ltd have prepared an Archaeological Impact Assessment Report that provides details on a series of site test trenching. Discussions with regard to the testing were held with Dr. M Connolly, KCC Archaeologist in advance of the test trenching. A series of 24 linear test trenches extending for c.2,250m were opened across the footprint of the proposed development. A single 19th century clay pipe bowl was found in test trench T9. The report concludes that there are no archaeological constraints related to the proposed development site.

4.7 Environmental Impact Assessment

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

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

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

"b)

(i) Construction of more than 500 dwellings

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

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

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

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

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

- With a site area of 3.8ha, the subject site is below the threshold that would trigger a mandatory EIA.
- At 188 the number of individual residential units falls below the threshold of 500 dwellings.

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

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

4.8 Water Framework Directive Assessment

A Water Framework Directive Assessment has been completed for the proposed development. The scoping stage of the WFD compliance assessment concluded that there were a number of components and activities associated with the proposed development that represented a risk to the WFD status and objectives and therefore were scoped into the assessment. The relevant quality elements contributing to the overall status were considered and how each potential impact could affect these. Mitigation measures included within the project design and the application of best practice mitigation measures will ensure that there will be no significant effects on the WFD status of the water bodies within the study area. The overall conclusion of this WFD compliance assessment is that there will be no risk of deterioration in status from the proposed development nor will it prevent the achievement of the objectives for the relevant water bodies including the protected area objectives.

4.9 Visual Impact

A Landscape and Visual Impact Appraisal has been prepared by Cunnane Stratton Reynolds has been submitted as part of this application pack. This preliminary report sets out the landscape and visual constraints and likely effects in relation to the proposed LRD Development at Deerpark, Killarney. The site is not located within a defined ‘Visually Sensitive Area’ per the provisions of the Kerry County Development Plan 2022-2028. The existing prevailing character is defined by a mixture of housing, a foodstore, a retail park and pitch and putt club. The assessment finds that visual effects will be relatively low-key by virtue of existing site boundary screen vegetation, the compatibility of proposed building heights relative to existing developments in the locality, and the use of dark roofing materials which assist integration in the local setting. There are no adverse effects arising from the proposed development.



Figure 4-5: Village Green character area (Top) and View of Apartments across central open space (Bottom)

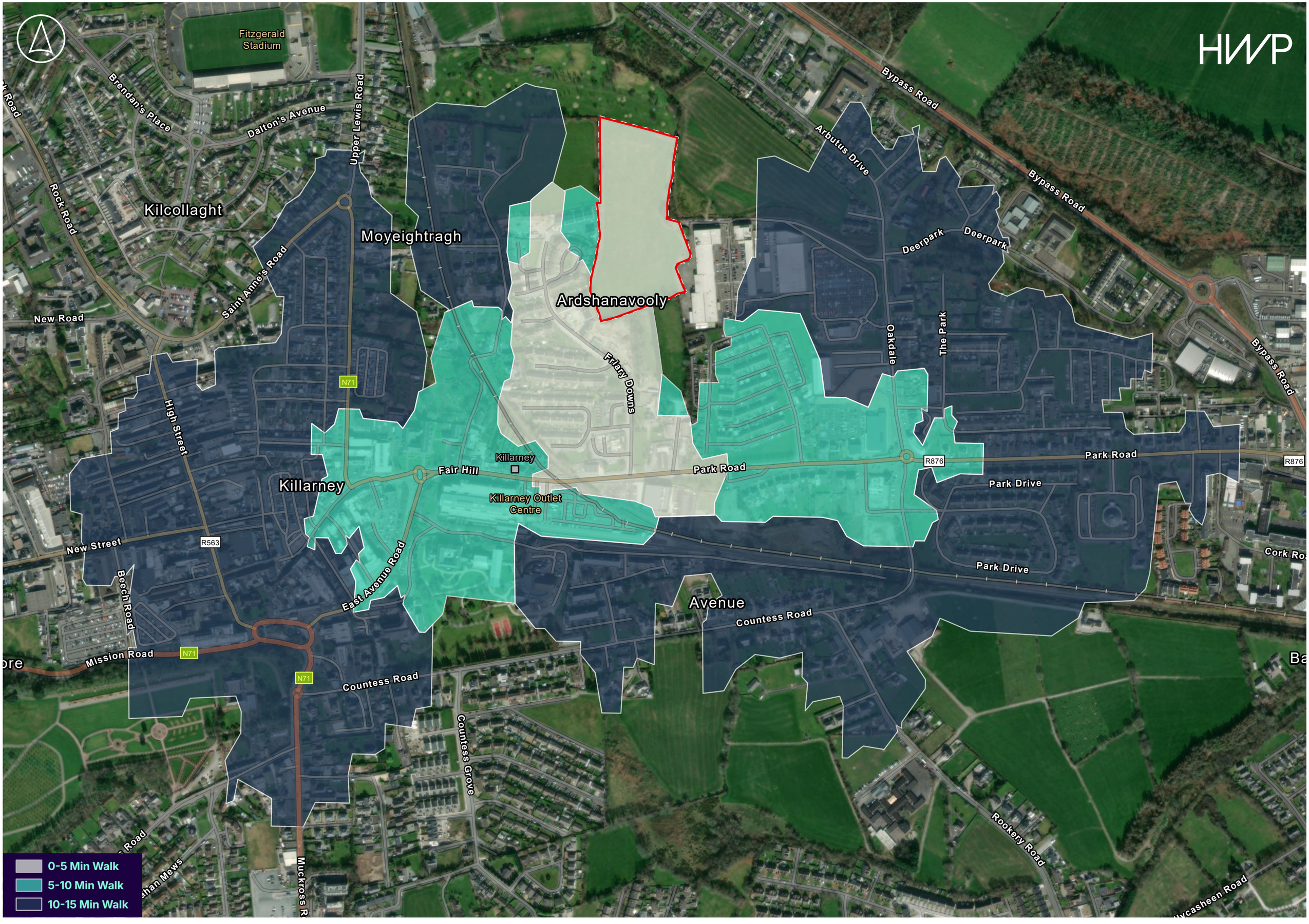
05 //

Conclusions

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

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

Appendix A: Connectivity Map


HWP
Fitzgerald Stadium
Brendan's Place
Dalton's Avenue
Upper Lewis Road
Rock Road
Kilcollaght
Moyeightragh
Saint Anne's Road
New Road
Ardshanavooly
Friary Downs
Arbutus Drive
Bypass Road
Deerpark
Oakdale
The Park
N71
High Street
Killarney
Fair Hill
Park Road
R876
Park Drive
Killarney Outlet Centre
New Street
R563
Beech Road
East Avenue Road
Mission Road
Countess Road
Countess Grove
Avenue
Rookery Road
0-5 Min Walk
5-10 Min Walk
10-15 Min Walk



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