

Statement of Consistency

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

Client: Ross-Park Residential HS Limited

September 2026

Connecting people.
Connecting places.

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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 188 no. residential units, a crèche and all ancillary site development works off Park Road, Ardshanavooly (townland), Killarney, 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.

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National Policy

2.1 Housing for All - A New Housing Plan for Ireland

The Action Plan for housing and homelessness is based around 4 pathways which aim to allow for the building of more homes to suit the population's needs, as well as improving the rental sector. The document recognises that the delivery of an increased number of newly built homes will be essential to relieving pressure in the rental sector. The plan includes several action points relating to the 4 pathways.

Policy	Consistency of scheme
Housing for All aims to address to the current shortage and affordability of residential accommodation across the county by delivering. - Increased supply of new housing, up to an average of at least 33,000 per year to 2030 - An average of 6,000 affordable homes to be made available every year for purchase or for rent by Local Authorities, AHBs, the LDA and via a strategic partnership between the State and retail banks. - A new Local Authority-led Affordable Purchase Scheme. - Introduction of a new form of rental tenure called 'Cost Rental' homes. 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 contribute an additional 188 no. housing units to the existing housing stock in Killarney. 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 37 no. Part V units included in the proposed development. This will consist of 20 no. 1-bed apartments and 17 no. 2-bed apartments. Further details are included in the submitted Part V proposal in the Planning Statement prepared by HW Planning and Part V drawings prepared by Reddy Architecture and Urbanism. The proposed development will positively contribute to housing delivery targets set out in 'Housing for All' 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.

2.2 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	A Climate Action and Energy Analysis Report has been prepared for the application that will set out the measures proposed to ensure the construction and operational phases of the development are in line with the CAP24 and CAP25 objectives.

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.	

2.3 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 recognizing Dublin's ongoing key role.

Policy	Consistency of Scheme
Killarney falls within the Southern Region where growth between 2022 and 2040 of 330,00 people is envisaged. **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	The proposed development is consistent with all strategic aims and objectives within the NPF. - The proposed development is located on lands zoned for 'Residential' use with a specific land use zoning 'New/Proposed Residential (R1)' in place for the area. - The proposed development is of high-quality design accessible to a range of services and facilities in the area. The subject lands are also traversed by an indicative roads objective under KCDP Objective KA 82 which aims to

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 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

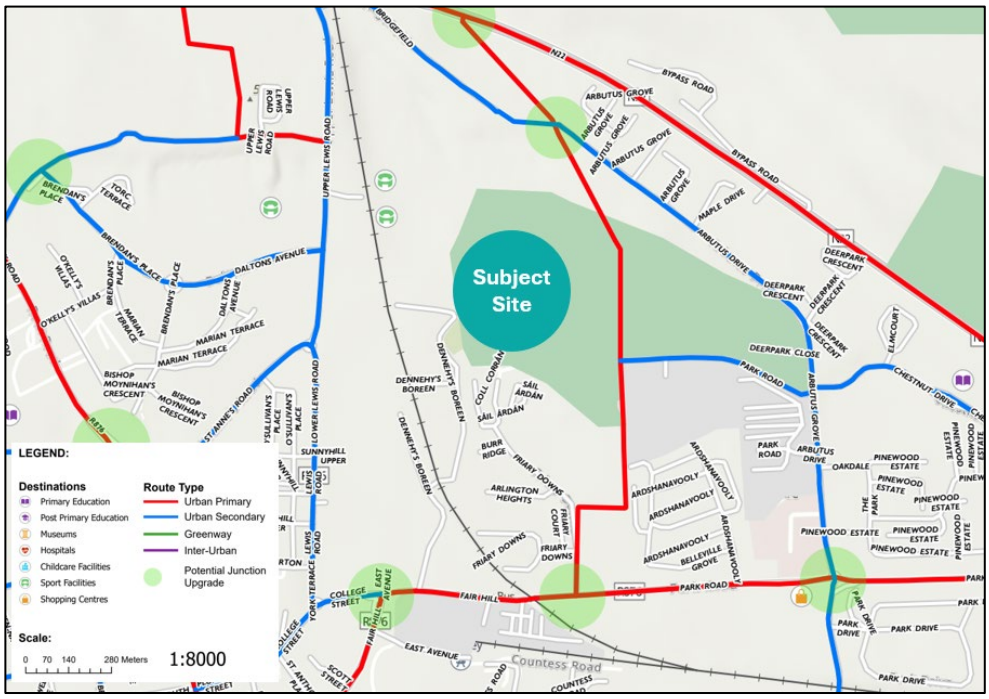
'Support the development of the inner relief road from Deerpark to Loreto Road'. The proposed development will delivery part of this route.

- 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, whilst appropriately respecting the developing built environment.
- The development of this zoned site will contribute directly to the realisation of compact growth and provide a critical mass of population to sustain the viability of the existing and proposed public transport. Furthermore, it will promote sustainable mobility across the site and into other areas such Killarney Town Centre.
- The proposed development of this site will contribute towards the achievement of compact growth in Killarney, at a sustainable location in proximity to Killarney town centre, amenities and childcare, education and health facilities.

The location of the proposed development near an existing railway line and Killarney bus station are in accordance with the '*Transport Orientated Development (TOD)*' objectives included in the NPF. **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 97** – The Metropolitan Area Strategic Plans, shall include provision for large-scale Transport Orientated Development (TOD) opportunities and may target a proportion of planned growth in the metropolitan areas towards the delivery of new sustainable communities at brownfield and greenfield locations in the principal city and suburbs areas and in the wider metropolitan areas focused on opportunities arising from existing and planned major public transport investment, along planned high capacity public transport corridors and in accordance with the principles of Transport Orientated Development.	The proposed development fulfils the principles and aims of TOD as set out in the NPF and will allow for development near an existing commuter train network and bus network. The development of these lands in the context of the railway line connections, will ensure future populations and employment growth is aligned with sustainable public transport options available in the area.

2.4 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.



The proposed development will be accessed via proposed inner relief road from Deerpark to Loreto Road (Urban Primary Road) that is proposed for the site. The proposed inner relief road from Deerpark to Loreto Road will connect to Fair Hill Road (Urban Primary Road) to the south and to N22 (Urban Primary Road) to the north of the site. There are a series of Potential Junction Upgrades included as shown on the above extract from the Draft CycleConnects scheme which will benefit the proposed development once completed.

Furthermore, the subject proposed includes the provision of pedestrian and cycle connections through the site and to adjacent sites. Potential pedestrian connections and potential cycle connections/pedestrian connections are shown to the adjacent site of Ardshanavooly to the west of the site.

The proposed development includes the delivery of part of the proposed Killarney Strategic Links Project – Links Road A-C. This will allow future residents of the scheme and existing residents in the area with increased connectivity and permeability through the site. This scheme has been fully designed to align with the objectives set out in CycleConnects and support the development of the future cycle infrastructure network throughout Killarney.

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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."*

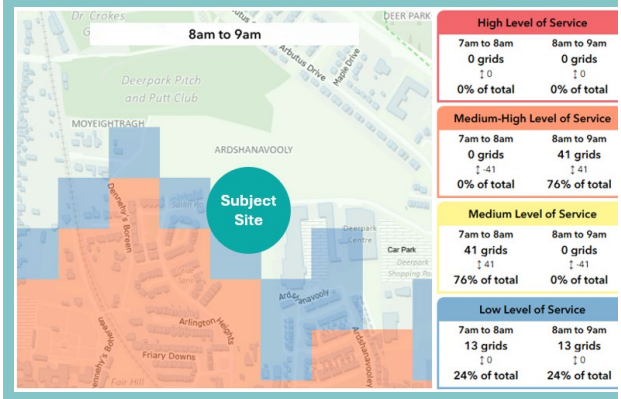
The Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published in 2009. They set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on residential development and the creation of 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 3.5 Areas and Density Ranges Key Towns and Large Towns (5,000+ population) **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.* Table 3.8 Accessibility **Accessible Location** *Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.* **Intermediate Location** *Lands within 500-1000 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**	The subject site is situated in a key town of Killarney. The inherent connectivity of the site with a range of services, will allow it to cater for a wide demographic ranging from families and students and older people looking to downsize. Notwithstanding this, the site is regarded as an adjoining location to the Key Town of Killarney in accordance with the Guidelines as it is not serviced by a high frequency public transport route (refer to Figure 01 below showing NRA PTAL mapping). Additionally, there is a 'Medium-High Level of Service' between 8am to 9am indicated for the area to the south of the site, as shown in the extract below. Sections 3.3 and 3.4.1 of the guidelines sets out that an appropriate density for such sites to be below the mid density range of 40-100 dph (net) for Centre and Urban Neighbourhood sites in Metropolitan Towns. Therefore, the proposed density of 53 dph is considered to be appropriate at this neighbourhood location. Given the pattern and scale of the existing low-medium density neighbouring residential development, a proposed density of 53 dph is

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.

Section 3.4.1 of the SRDCSG sets out that the proposed density ranges should be refined further based on considerations of:

> *'planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area, densities closer to the mid-range at intermediate locations and densities below the mid-density range at peripheral locations.'*



Extract from National Transport Authority (NTA) PTALs Mapping

considered appropriate to respect and reflect the existing urban form.

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 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.

In line with the Sustainable and Compact Settlements Guidelines for Planning Authorities 2024, all units will 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 has been submitted to demonstrate 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

A Housing Qualify Assessment has been prepared in addition to an Architectural Design

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

Statement by Reddy Architecture and Urbanism, that demonstrates that the proposed scheme will comply 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 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.

The public open space provision is 10.6% of the developable area, demonstrating alignment with Policy Objective 5.1 – Public Open Space. Kerry County Council have confirmed that 10-15% open space is the relevant standard for this development.

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.

The proposed development will provide for the provision is made for 2 on-curtilage parking spaces for the larger semi-detached dwellings. There are 1.1 parking spaces per unit off curtilage for the smaller dwelling types. For the apartment and maisonette units, there are 0.8 parking spaces per unit.

Overall, the quantum of residential car parking spaces is 218. A further 7 spaces are allocated for the crèche. The total parking quantum provided for the scheme is 223, in line with the parking standard set out in SPPR 3, with an average of 1.01 car parking spaces provided per unit.

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.

The proposed house units have ground floor level open space and therefore no specific bicycle parking provision is required. Dedicated bike storge is provided on the basis of approximately 1 space per bedroom for all apartment unit. In total this equates to 68 no. apartment units in Blocks A and B. In line with SPPR 4 there is a requirement for 104 no. residential bike storage spaces to be provided. This is exceeded in the proposed layout with

	the provision of 141 no. residential bike spaces. 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.
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 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.	A technical assessment carried out by DKP International has been undertaken 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	We note SPPR1 with regard to housing mix. As set out 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 Killarney community and is not based on maximum or minimum standards.

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 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.	Total Residential Units 188 1 Bedroom Apartment 36 (19.2%) 2 Bedroom Apartment 32 (17%) 2 Bedroom House 19 (10%) 3 Bedroom House 67 (35.6%) 4 Bedroom House 34 (18%)
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 68 no. apartments units to be provided within this scheme comprise of 1 no. and 2 no. bedroom units. All (100%) units exceeds the minimum required floor areas, as outlined in the accompanying drawings. This is significantly in excess of the Guideline's recommendation that 25% of all apartments in a proposed scheme shall exceed the minimum floor area standard by a minimum of 10%. 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 Reddy Architecture and Urbanism, 100% of the proposed housing units, 62% of proposed apartments units are dual aspect. This equates to 68.3% of total units, significantly in excess of the 25% requirement. Of the single aspect units none are solely north-facing, with all being orientated either south-easterly, north-easterly, north-westerly or south-westerly.
Specific Planning Policy Requirement 4 Ground level apartment floor to ceiling heights shall be a minimum of 2.7m.	All proposed ground floor apartment units will be 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	A creche facility is provided with the proposed scheme with the provision of 40 no. child places. Further detail on the provision of this creche facility is

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.	contained within the Childcare Needs Assessment prepared by HW Planning.
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 141 spaces is far in excess of the total required under SPPR4 of the SRDCSGs. The enclosed detailed Parking Allocation Drawing prepared by Reddy Architecture and Urbanism demonstrate that the design of the 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 Parking Plan drawing indicates that the car parking provision at a total of 223 spaces is significantly below the maximum standard of 2 spaces per dwelling for locations set out in the SRDCSGs. This provision equates to an average of 1.2 residential spaces provided per unit.
<u>Minimum floor areas for private amenity space</u> 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	All apartments within the scheme will meet or exceed the minimum required floor areas, as outlined in the accompanying Architectural Design Statement prepared by Reddy Architecture and Urbanism.
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 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.

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 threshold for provision should be established having had regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas	The proposed development is a large residential scheme consisting of 188 units at Deer Park, Killarney, Co. Kerry. Provision has been made on site for a 40 child place creche in accordance with established standards for demand arising from 100% of the 2 bedroom residential units and 100% of the 2+ bedroom units in the scheme. The rationale for providing this quantum of childcare is outlined in the accompanying Childcare Needs Assessment prepared by HW Planning. This has considered the existing geographical distribution of childcare facilities in the area as well as the demographic profile of Killarney.
Circular PL 3/2016 In March 2016, the Department of the Environment, Community and Local Government issued a circular in relation to childcare facilities under the early Childhood Care and Education (ECCE) Scheme. Planning Authorities are requested to exclude matters relating to childcare facility standards outlined in Appendix 1 of the Childcare Facilities Planning Guidelines 2001 – including the minimum floor area requirements per child- from their consideration of planning applications relating to childcare facilities and to solely focus on planning related considerations that fall within the remit of the Planning and Development Act 2000, as amended, in the determination of such planning applications.	This has been acknowledged as part of scheme development which includes on-site provision of a creche.

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	This Large-scale Residential Development application is supported by a detailed Traffic & Transport Assessment (TTA) and a Statement of DMURS Compliance has been prepared by MHL Consulting Engineers which addresses the relevant policies and

5. Movement, Place and Speed 6. Streetscape 7. Pedestrian and Cyclist Movement 8. Carriageway Conditions	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.

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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.''*

Killarney is classed as a key town in the RSES for the southern region. The vision for key towns is to ensure consolidation and spread of growth beyond the cities to the sub regional level. Killarney with a population of 14,504 and 7,108 jobs in the area is a key economic driver in the Kerry Hub Knowledge Triangle. It is ideally located on the strategic road network linking with the Atlantic Corridor.

Policy	Consistency of Scheme
To achieve the vision for key towns, under RPO18 the RSES has provided guiding principles on how Killarney can achieve this: a) Sustainably strengthen the role of Killarney as a strategically located urban centre of significant influence in a sub-regional context, a centre of excellence in tourism, recreation and amenity sectors, to promote its role as a leader in these sectors, in particular training and education, and strengthen its overall multi-sectoral dynamic as a key settlement in the Kerry Hub Knowledge Triangle accessible to regional airport, port, rail and road assets; b) To seek investment to sustainably support its compact growth and regeneration, attribute and infrastructure including key inter-regional connectivity (transport networks and digital) on the strategic road network between Cork and Limerick Shannon Metropolitan Areas the Atlantic Economic Corridor and the Kerry Hub Knowledge triangle, subject to the outcome of the planning process and environmental assessments c) To strengthen 'steady state' investment in existing rail infrastructure to ensure its continued renewal and maintenance to high level in order to provide quality levels of safety, service,	The proposed development is in accordance with all relevant core objectives of the RSES. The proposed development will contribute to a stronger residential area in Kerry by delivering residential development at a location served by employment, recreational, educational and public transport opportunities. The proposed development will contribute positively towards achieving the strategic aims of the RSES for Killarney with regard strengthening its role as a key town. The development will contribute directly to a positive increase in population growth. The proposed development will offer a variety of house types, notably apartments units to meet the needs of people employed in the training/service sector. The proposed development within the built-up footprint of the settlement will sustainably support the compact development of Killarney. The proposal will provide the critical mass necessary to encourage the further improvement of the rail and public transport infrastructure.

accessibility and connectivity including improved frequency and journey times d) To support infrastructure investment and the regeneration of opportunity sites including the Sara Lee, Aras Phadraig and St Finians; e) To seek investment in infrastructure that provides for both the resident population and extensive influx of visitors; f) To support investment in infrastructure and the development of lands to the north of the existing by-pass in accordance with proper planning and sustainable development objectives including the appropriate master plans in consultation with statutory stakeholders; g) Future growth of the town should be planned for on a phased basis in consultation with the local authority and Irish Water to ensure that sufficient wastewater capacity is accounted for and that further growth avoids negative impacts on the downstream freshwater ecosystem in the National Park (River Deenagh, Lough Leane).	The development will provide homes for Killarney residents and support the tourism sector by providing accommodation for workers employed in the sector. As the accompanying confirmation of feasibility from Uisce Éireann indicates, there is existing water and wastewater capacity to support the immediate development of the subject site. The water connection will be subject to upgrades, while the wastewater connection is feasible without infrastructure upgrades by Uisce Éireann. An AA Screening / NIS report has been prepared by MWP Consulting Engineers.
Transitional Local Authority Population projections to 2031: South-West[61] 		2016	2026	Uplift[79]	2031	Uplift[80]
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Kerry	147,500	161,000-163,500	13,500-16,000	166,500-170,500	19,000-23,000		The graph 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 Killarney Metropolitan Area will contribute to a positive increase in population towards achieving this population target.
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 Killarney Metropolitan Area 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. Accompanying this application is: • Drainage Impact Assessment • Ecology Impact Assessment Report • Archaeological Impact Assessment 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. The development is in close proximity to Killarney National Park Special Protection Area (SPA) and the Killarney National Park, Macgillycuddy's Reeks and

	Caragh River Catchment Special Area of Conservation (SAC). The application is accompanied by an Environmental Impact Assessment (EIA) Screening Report and an Appropriate Assessment Screening and Natura Impact Statement Report that will assess the impacts of the development on these European Sites
RPO 5 -Population Growth and Environmental Criteria 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 such as Deerpark Retail Park, educational and recreational opportunities in the local area and nearby Killarney town centre. The nearby Killarney House and gardens as well as Lough Leane offer a diverse range of amenities in the area. 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 to the west and south of the site. The supporting documentation that have been lodged with the application will include an EIA Screening Report and Natura Impact Statement that have assessed all likely significant effects on the environment arising from the proposed development.
RPO 9 - Holistic Approach to Delivering Infrastructure 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 Killarney. 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.
RPO 124 - Green Infrastructure (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 biodiversity value, ecological corridors and networks that connect areas of high conservation value such as woodlands, hedgerows, earth banks, watercourses and wetlands.	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 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 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. The layout of the site includes pedestrian areas and traffic calming measures throughout the scheme that will

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 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.	promote increased and safer levels of walking and cycling within the settlement.
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. *''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''.*	The subject site is ideally located to capitalise on its sustainable location within walking/cycling distance of Killarney town centre, the existing Killarney Train Station and Killarney Bus Station.
<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	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

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.	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 Cunnane Stratton Reynolds further details the landscaping approach for the development.
RPO 218 - Sustainable Urban Drainage and Rainwater Harvesting It is an objective to support the incorporation of Sustainable Urban Drainage Systems (SUDs) in all public and private development in urban areas. The 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.	As outlined in 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 including tree pits, infiltration, filter drains, rain gardens, and storage bioretention basins. Implementation of these SuDS measures during construction and operation of the site will achieve this regional objective.

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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.

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. Killarney as an economic driver for the county is identified as a Key Town and an appropriate location to prioritize sustainable development.

Policy	Consistency of Scheme
Objective KCDP 3-2 – Core Strategy *Support the sustainable growth and prioritise development of the county's settlements in accordance with the Settlement Hierarchy and the Core Strategy.* **Objective KCDP 3-4 – Settlement Strategy** *Deliver at least 30% of all new homes in the Key Towns of Tralee and Killarney within the existing built-up footprint of the settlements.* *Section 3.10.3 of the Core Strategy relates to population distribution;*	As shown in the Core Strategy Table 3.7, 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 1,630 persons in Killarney town. Table 3.7 of the KCDP calculates the housing requirement to meet this population target for Killarney as 1,277 units within the existing 67.3 hectares of zoned land. The proposed development of 188 units contributes positively towards achieving these population targets and housing requirement figures.
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 53 units per ha, is an appropriate scale given the site-specific internal relief road and locational factors, the design response to which necessitates appropriate consideration of existing scale and grain of development and the incorporation of suitable setbacks to protect amenities.

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)*
County		147,707	156,902	9,363	7,000		
Key Town	Tralee	23,691	25,297	2,663	2,087	84.0	84.0
	Killarney	14,504	15,487	1,630	1,277	67.3	67.3
		38,195	40,784	4,293	3,364		

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

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 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.*	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 house types and sizes plus apartments and is in accordance with guidance outlined Guidelines. The development promotes sustainable methods of transport including walking, cycling and public transport. The Connectivity Map enclosed as Appendix A to this statement and the information that is contained within the accompanying Traffic and Transportation Assessment prepared by MWP 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 site is within walking distance of Killarney Town Centre, Killarney Bus and Train Stations, employment centres (e.g. the Great Southern Killarney Hotel and Deerpark Retail Centre) and other major employment centres notably Tralee, Cork City, and Limerick City.
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*	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 development 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. This area incorporating the existing 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.
Objective KCDP 4-40 – Residential Densities and Building Heights *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).*	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 Reddy Architecture and Urbanism 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 Reddy Architecture and Urbanism indicates the scheme's compliance with the Apartment Guidelines. The proposed development height range of 2-4 storey complies with the Urban Development and Building Heights Guidelines for Planning Authorities 2018. The Ministerial Guidelines emphasis that it is Government policy that building heights must be generally increased in appropriate urban areas. Section 3.4 of the guidelines states that newer housing developments outside city centres typically now include apartments of 4 storeys and upwards.
Objective KCDP 6-2 – Population & Community Profile *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.* **Objective KCDP 6-3 – Climate Change & Sustainable Communities** *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 walking, cycling, and public transport is prioritised and which supports the retention of existing ecological*	A range of public amenity areas have been provided as part of the development. In addition, the provision of the creche will also serve as an important community outlet.

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 Key Town of Killarney. This is reflected in the proposed density of 53 dph, which is within the density range as set out in the 2024 Guidelines, 40 dph – 100 dph (net) for urban neighbourhoods. At a proposed density of 53 units per hectare, the subject proposal falls comfortably within this density range. As a zoned site within the development boundary of Killarney, 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 transportation 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 37 no. Part V units. A Part V Proposal 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 *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.* **Objective KCDP 6-21 – Universal Access** *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*	The development promotes sustainable methods of transport including walking, cycling and public transport. The Connectivity Map enclosed as Appendix A to this statement and the information in the accompanying TTA prepared by MWP 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.

their own homes longer and function better as they face aging-related disabilities **Objective KCDP 6-23 – People with a Disability** *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).*	A Universal Design Statement has been prepared by Reddy Architecture and Urbanism, in accordance with Objective KCDP 6-21 and Objective KCDP 6-23.
Objective KCDP 6-33 – Sporting, Leisure Facilities and Open Space *Implement the recommendations of 'Developing Play in Kerry Policy', in a sustainable manner, in conjunction with all relevant agencies.*	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 Cunnane Stratton Reynolds.
Objective KCDP 6-36 – Open Space *Provide multifunctional open spaces at locations deemed appropriate providing for both passive and active uses.*	The development provides for public open spaces, a central lawn, green streets, private gardens and a biodiversity corridor. A biodiversity green corridor has been designed to travel through the scheme. 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 *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.*	As per Objective KCDP 6-52, a 40 child place crèche is proposed at the west of the site by the primary vehicular node to the site. Vehicular access to the creche is via a set-down area off the internal road, to ensure safety of the users. The provided number of places is in accordance with the Childcare Guidelines for Planning Authorities 2001. A Childcare Needs Assessment prepared by HW Planning is enclosed with this application.
Objective KCDP 7-8 – Density *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).*	The proposed development has a net density of 53 no. units per hectare. As a zoned site within the development boundary of Killarney, 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 transportation options.
Objective KCDP 7-9 – Housing Mix *Promote integration of social housing and ensure a housing mix within developments in order to promote a socially balanced and inclusive society.*	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 188 residential units comprising 120 no. dwelling houses (67 no. 3-bed houses, 34 no. 4-bed houses, and 19 no. 2-bed houses), 68 no. apartment units comprising 36 no. 1-bed and 32 no. 2-bed units provided.

	37 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 *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.*	The Kerry County Development Plan 2022 – 2028 (CDP) notes that the Killarney Urban ED had the highest average age for the larger towns category in Ireland in the 2016 Census. This average age is reflective of the ageing population of the County and the popularity of Killarney as a retirement destination. Based on the demographic profile of Killarney we envisage that the primary market for the proposed apartments in the Deer Park scheme will be retirees and young professionals working in the many employment centres within Killarney.
Objective KCDP 8-24 – Archaeological Heritage *(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 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.*	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 Laurence Dunne Archaeology Ltd. There are no recorded protected structures located on the site.
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 incorporation of some existing 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.* **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**	The development provides for an appropriate level of street lighting. The application has been accompanied by lighting drawings that will show the positioning, style and quantity of lighting for the development.

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 *Have regard to and implement the recommendations and provisions of the Planning System and Flood Risk Management guidelines (DoEHLG 2009).*	The enclosed Flood Risk Assessment prepared by MWP Consulting Engineers concluded 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 even though the proposed site including all residential dwellings was found to be in Flood Zone C, 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 *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.*	The enclosed Landscape Design Report prepared by Cunnane Stratton Reynolds 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 *Preserve the views and prospects as defined on Maps contained in Volume 4*	The enclosed Landscape Design Report prepared by Cunnane Stratton Reynolds 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 *Support the incorporation of Sustainable Urban Drainage Systems (SUDs) in all public and private development in urban areas.*	The delivery of the proposed scheme will include storm water management measures including the provision of SUDS measures across the development. These measures include bioretention rain garden/tree pit, dry swales, and an attenuation storage tank.
Objective KCDP 14-15 Active Travel 7 Greenways *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.*	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*	All safety issues in relation to traffic and road infrastructure have been assessed in the enclosed Road Safety Audit produced by MWP Consulting Engineers which accompanies this application.

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.

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.

Extract from Page 45

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	

There are 5 no. parking spaces provided for the childcare facility staff use with a separate drop-off parking area for parents use.

Due to the sustainable location of the subject development and the desire to achieve modal shift away from the private car, the level of provision is consistent with Ministerial Guidelines.

In addition, 141 no. bicycle spaces have been provided for the future apartment residents', visitor and creche users' use. 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.

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 Connectivity Map (refer Appendix 1) prepared by HW Planning illustrates how the site will function within its overall context. The site itself is accessible on foot from the town centre and 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 Reddy Architecture and Urbanism accompanies this submission. The Housing Quality Assessment document also prepared by Reddy Architecture and Urbanism addresses details and calculations on plot ratio and site coverage.

Design considerations for energy consumption will be outlined in the Energy and Carbon Emissions and the Low Energy Technologies sections of the Building Lifecycle Report prepared by Reddy Architecture and Urbanism.

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

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.

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 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*	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 'Urban Neighbourhood' of Killarney, a Key Town. This is reflected in the proposed density of 53 dph, which is within the density range as set out in the 2024 Guidelines, 40 dph – 100 dph (net). The proposed residential net density is 53 units per hectare. Given the site's context, residential density is deemed appropriate for the site. The proposed site is permeable and well connected to the local town centre and public transport infrastructure.
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.*	The Architectural Design Statement prepared by Reddy Architecture and Urbanism and the Planning Statement prepared by HW Planning which will accompany this application address these requirements.

• *A breakdown of the proposed unit type and size, including the percentage split between 1/2/3+ bed 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 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.*	The Schedule of Areas and Housing Quality Assessment prepared by Reddy Architecture and Urbanism which accompanies this application addresses this requirement.
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 CEMP prepared by MWP Consulting Engineers addresses 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 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.	A Traffic and Transport Assessment has been prepared by MWP Consulting Engineers and accompanies this application and will addresses this requirement.
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 passive surveillance over street frontages,	The Architectural Design Statement prepared by Reddy Architecture and Urbanism and the Landscape Design Report prepared by Cunnane Stratton Reynolds that will accompany this application will address these requirements.

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 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.	The Building Lifecycle Report prepared by Reddy Architecture and Urbanism and the Landscape Design Report prepared by Cunnane Stratton Reynolds which will accompany this application addresses this requirement.
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*	As outlined in the Schedule of Accommodation prepared by Reddy Architecture and Urbanism and the Landscape Design Report prepared by Cunnane Stratton Reynolds, the provision of 10.6% 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. As set out in Section 3.1, Policy Objective 5.1 of the Sustainable and Compact Settlements Guidelines for Planning Authorities (2024) provides that open space should comprise between 10% and 15% of the developable area. Kerry County Council has confirmed that this guideline range constitutes the relevant assessment criterion for the proposed development, reflecting the national policy status of the Guidelines.

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.

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 Cunnane Stratton Reynolds 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 Cunnane Stratton Reynolds.

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

No. of bedrooms	Minimum Private Open Space
1 - 2 bedroom*	50 sqm
3 bedroom	60 sqm
4 bedroom (or more)	75 sqm

*Reduced quantum may be considered in respect of housing for older people/ sheltered housing etc.

Table 1: Minimum Private Open Space Requirements for Dwelling Units

Reddy Architecture and Urbanism 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.

• *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 Proposed Site Layout Plan prepared by Reddy Architecture and Urbanism.
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 Reddy Architecture and Urbanism, the total area covered by buildings on the site constitutes 3.5 hectares of a total site area of 3.8 hectares, excluding public/private open space areas, landscape corridors and required circulation space. This is less the maximum figures set in the CDP.
1.5.4.9 Building Height *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).*	As set out in section 3 of this document, the proposed building height range is in line with the Ministerial Guidelines.
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*	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 will achieve the required separation distances between buildings.

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.*	
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 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.*	Cunnane Stratton Reynolds have prepared suitable landscaping provisions to address this development management standard.
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.*	The design of the proposed bin store as indicated in the enclosed drawings prepared by Reddy Architecture and Urbanism fully conforms to this requirement, as does the apartment bin storage area in the floor plan.

• *In the case of communal refuse, recycling and composting storage, the collection point should be accessible both to the waste collection vehicles and to the resident and be secured against illegal dumping by non-residents.* • *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.* • *For individual houses, the applicant/ developer must identify the proposed location and design of bin storage to serve each dwelling.*	
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.*	A Construction Environmental Management Plan has been prepared for this application and details the proposed phasing of the development.
1.5.4.14 Services *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.*	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 *A management plan for the reuse, recycling or disposal of Construction & Demolition waste will be required to be submitted as part of an application.*	A CEMP has been prepared as part of this development 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 units have been designed in full compliance with the Apartment Guidelines. The accompanying Housing Quality Assessment prepared by Reddy Architecture and Urbanism, 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 *set out that in multi-unit residential development EV parking at a minimum of 1:5 car parking spaces should be provided.*	In relation to the parking provision for the apartment within the scheme, the appropriate EV parking quantity has been provided for the development.

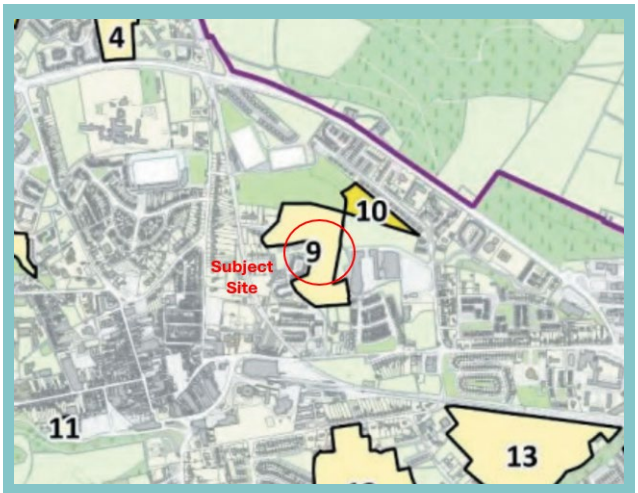
5.2 Killarney Town Development Plan 2022 – 2028 (Volume 2 of CDP)

The Killarney Town Development Plan is the statutory planning policy framework for Killarney town. The Killarney Town Development Plan outlines the Council's policies and objectives for the development of Killarney town. Its vision is to create an attractive location to live, work and visit and to *'interweave the fabric of the Urban Core of Killarney seamlessly into the National Park so as to strengthen the role of Killarney as a centre of excellence in tourism, recreation and amenity, creating an attractive location to develop training and education centres of excellence'.*

Policy	Consistency of Scheme
The Strategic Objectives for Killarney include the following: *KA 4 - Facilitate and promote greater integration of the town and the National Park in a manner compatible with nature conservation objectives.* *KA 5 - Ensure that the town is attractive, liveable, vibrant, and a well-designed urban place with diverse and integrated communities enjoying a high quality of life and promote an enhanced sense of place, liveability and personal wellbeing.* *KA 7 - Improve subject to environmental assessment, inclusivity, accessibility, permeability and connectivity throughout the town and where appropriate with the National Park for alternative modes of transport, including cycling and walking.* *KA 8 - Alleviate traffic congestion by the transition to Low Carbon and Sustainable Mobility Policies.* *KA 13 - Facilitate the development of 1,277 residential units within the town boundary.* *KA 15 - Facilitate the provision of a range of housing solutions, to cater for the diverse housing demand within the town, catering for individuals and families at appropriate scales and attractive alternatives to urban generated housing in rural areas.*	The proposed development is consistent with all strategic aims and zoning objectives in the Killarney Town Development Plan. The subject site is located within the development boundary of Killarney approximately 1 kilometre from Killarney town centre. The Kerry CDP Core Strategy envisages population growth for the town of 1,630 person and the development of up to 1,277 dwellings during the lifetime of the plan period. The proposed 188 residential units will contribute positively to this. The proposal will contribute directly to a positive increase in residential density in the area, whilst the development of an infill site will contribute directly to the realization of compact growth in urban settlements. The proposed housing mix, targeting at accommodating young professionals and older residents looking to downsize will contribute towards housing a diverse community in the area, specifically in the context to the age profile of the town and its importance of its seasonal tourism workforce. The proposed scheme has been designed to enhance the connectivity of the area, fostering sustainable travel linkage with the nearby Killarney Sports and Leisure Centre and providing connectivity to other surrounding areas.
KA 18 - Ensure that all new developments in the Town are energy efficient and reflect the sustainability ethos in their approach to development. *KA 19 - Strengthen Killarney's existing green and blue Infrastructure and facilitate its sustainable expansion in line with The EU's Biodiversity Strategy 2030.*	The Architectural Design Statement prepared by Reddy Architecture and Urbanism includes a Building Life Cycle Section, which sets out how the proposed scheme achieves energy efficiency and sustainability. As set out in the Landscape Design Report prepared by Cunnane Stratton Reynolds stated the development will benefit from proactive management of both green and blue infrastructure to provide benefits to the 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.
KA 20 - Maintain and conserve the conservation value of the Killarney National Park as a European site (365and 4038), a National Park and a UNESCO Biosphere Reserve and the Rivers Flesk and Deenagh (part of a candidate Special Area of Conservation (cSAC))during the lifetime of this plan and to	In line with this requirement an Appropriate Assessment Screening/Natura Impact Statement reporting has carried out for the proposed development by MWP Consulting Engineers to assess whether the proposal is likely to have significant effects

ensure a screening determination for an Appropriate Assessment is carried out where development projects are likely to have significant effects on this European site whether within or outside the boundary of the European site. *KA 21 - Ensure developments in the plan area, particularly within brownfield sites, are informed by Lesser Horseshoe Bat surveys and impact assessments where appropriate, undertaken by a suitably qualified individual.* *KA 22 - Ensure that there is no significant increase in artificial light intensity adjacent to Lesser Horseshoe Bat roosts named in the Conservation Objective Report for the Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC (Oct 2017) or along commuting routes within 2.5km of those roosts.* *KA 23 - Work with relevant stakeholders to protect biodiversity within the town's environs and to ensure that future development is sensitive to Killarney's location close to the Killarney National Park, European/Natura 2000 Sites and the Kerry UNESCO Biosphere.*	on this European site whether within or outside the boundary of the European site.
KA 24 - Promote the sensitive integration and access to natural heritage and associated recreation facilities, having regard to environmental designations in the area. *KA 25 - Ensure that all plans and projects follow Article 6 of the Habitats Directive and that the ecological integrity of Natura 2000 sites is safeguarded.* *KA 26 - Ensure that there is no significant decline in the extent of potential foraging habitat or significant loss of linear features / commuting routes associated with Lesser Horseshoe Bat Roosts named in the Conservation Objective Report for the Killarney National Park, Macgillycuddy's Reeks and Creagh River Catchment SAC (Oct 2017).* *KA 27 - Protect non designated habitats and species, local biodiversity features and to maintain and enhance ecological corridors and natural features of the landscape such as hedgerows, trees, rivers, lakes, parklands, ponds and roadside verges.* *KA 28 - Seek to achieve a sustainable pattern of development which will facilitate the conservation of natural resources and habitats and minimise pollution. SuDS and other nature-based solutions will be encouraged for the protection of water quality.* *KA 29 - Promote the integration and improvement of natural watercourses in development proposals having regard to the IFI's 'Planning for Watercourses in the Urban Environment'.* *KA 30 - Work with stakeholders to promote biodiversity in the town including swift nest box projects boxes and actions from the All-Ireland Pollinator Plan such as recommendations for grassland management and pollinator friendly planting schemes/landscaping.* *KA 31 - Ensure the protection of existing trees in the town and undertake a Tree Management Strategy over the lifetime of the plan. Where appropriate, proposed developments will require a comprehensive tree survey undertaken by a suitably qualified arboriculturist.*	Reddy Architecture and Urbanism have liaised closely with Cunnane Stratton Reynolds to ensure the sensitive treatment of natural heritage in the vicinity of the subject site. Existing habitats have been maintained and enhanced where possible to minimise loss of habitat and commuting routes. The specific mitigation measures proposed to are outlines in the enclosed EcIA prepared by MWP Consulting Engineers and in the Landscape Design Report prepared by Cunnane Stratton Reynolds.

KA 32 - Protect the town's existing floodplains and wetlands from inappropriate development in recognition of their function as attenuators and conveyors of flood water. *KA 33 - Implement the recommendations and provisions of the Planning Guidelines on the Planning System and Flood Risk Management (DoEHLG 2009), (UOM 22) and ensure that flood risk assessment policies, plans or projects are compliant with Article 6 of the Habitats Directive.* *KA 34 - Facilitate the construction of any flood mitigation infrastructure identified in the CFRM Flood Management Plans for UOM 22, subject to project level environmental assessment.*	The proposed development is supported by a Flood Risk Assessment prepared by MWP Consulting Engineers. This assessment concluded 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 even though the proposed site including all residential dwellings was found to be in Flood Zone C, and the proposed development will not increase run-off rates when compared with the existing site and satisfies the requirement of the SSFRA to not increase flooding. Therefore, the development avoids significant risks of flooding in line with the Ministerial Guideline.
KA 68 - Ensure that usable and high-quality open space is provided to enhance the character of residential areas. *KA 70 - Provide adequate recreation and amenity open space for the future development of the town, as a whole, for residents and visitors alike.* *KA 71 - Improve accessibility to recreational and amenity areas and include for sustainable modes of transport, where appropriate.* *KA 76 - Develop and promote a more cycle and pedestrian friendly network and ancillary infrastructure throughout Killarney, having regard to environmental designations in the area.* *KA 77 - Facilitate the development of a cycling network strategy for Killarney Town and provide cycle lanes throughout the town at appropriate locations.* *KA 78 - Develop cycling and walking linkages between Killarney town centre, key strategic public amenities and residential neighbourhoods in the town, having regard to environmental designations in the area.* *KA 79 - Facilitate the enhancement of Killarney as a 10-minute town.* *KA 80 - Facilitate improvement of existing footpaths and road network and support future projects for footpaths and roads with the provision of amenity areas at appropriate locations.*	As set out in the Landscape Design Report prepared by Cunnane Stratton Reynolds this landscape-led proposal aims to create quality public and semi-private open spaces that provide a strong neighbourhood identity and support a good quality of like for new and existing residents in the area. All open space have been designed to have multiple functions responding to the needs of people and the environment. In addition, new housing overlooks all open spaces to ensure passive surveillance of amenity areas. The design approach puts the emphasis on delivering quality in all the proposed external environment both aesthetically and in how they can be used inclusively and provide a broad range of benefits to residents.
Appendix 6 Settlement Capacity Audit	The KCDP includes a Settlement Capacity Audit of the key towns of Killarney and Tralee, and the regional town of Listowel to identify new development in terms of suitable lands and infrastructure within the plan period. The proposed development site is identified as site K-9 on the corresponding zoning map. The subject site is identified as having existing road access, footpaths, public lighting, foul/storm sewer, water supply and are considered to be Tier 1 lands.



ID	Zoning	Road Access	Footpaths	Public Lighting	Foul/ Storm Sewer	Water Supply	Tier	Area (ha)	Estimated Density Units p/ha	Potential yield
K-1/2	R4	x	✓	✓	✓	✓	2	24.07	-	-
K-3	R1	✓	x	x	✓	✓	2	1.19	20-25	15-25
K-4	R1	✓	x	x	✓	✓	2	2.35	20-25	40-55
K-5	R1	✓	✓	✓	✓	✓	1	1.69	25-30	35-50
K-6	R4	✓	✓	✓	✓	✓	2	1.81	25-30	40-55
K-7	R1	✓	✓	✓	✓	✓	1	0.79	25-30	15-25
K-8	R1	✓	✓	✓	✓	✓	1	4.12	30-35	155-200
K-9	R1	✓	✓	✓	✓	✓	1	7.1	25-30	170-200
K-10	R4	✓	✓	✓	✓	✓	1	1.94	-	-

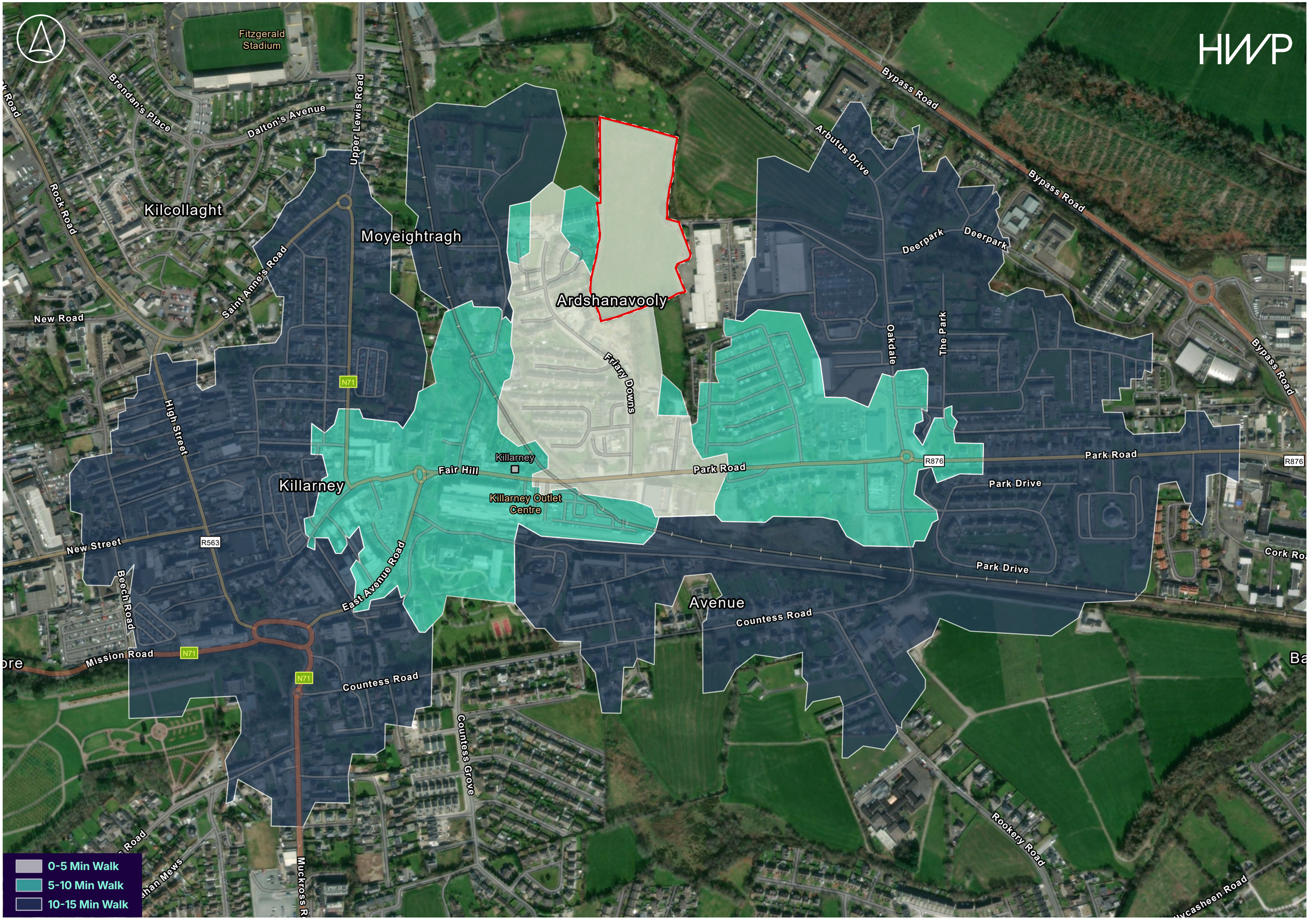
5.3 Kerry County Council – Local Authority Climate Action Plan 2022-2029

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: 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.* *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.* 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-*	The proposed development is consistent with EG1 as the design has been shaped to protect sensitive biodiversity within the site and in the National Park. The layout design includes a number of features to enhance water holding capacity. These measures include bioretention rain garden/tree pit, dry swales, and an attenuation storage tank. The enclosed EcIA, NIS and EIA screening have all considered the potential environmental impacts arising from the proposed development. Each has concluded that no significant negative effect on the receiving environment is anticipated. As noted above and in the enclosed EcIA and NIS, the proposed development has been carefully considered

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.	across a range of aspects to ensure that nearby important habitats are protected.
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.	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 has been 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.
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.	The proposed development has been landscape-led 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.
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.	The proposed planting regime enhances existing ecological connectivity.
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.	

06 // 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