



## Statement of Consistency

Proposed Large-scale Residential Development, Port  
Road, Killarney

**Client:** Portal Asset Holdings

April 2024



**Connecting people.**

**Connecting places.**

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Appendix 1 – Connectivity Map



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# Introduction

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## Purpose of Statement

This statement of consistency has been prepared in accordance with the provisions of Section 5(2) 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 224 no. residential units, a crèche and all ancillary site development works at Port Road, 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.

# National Policy

## Rebuilding Ireland

The action plan for housing and homelessness is based around 5 pillars, including the aim of building more homes as well as improving the rental sector. The plan includes a number of Action points relating to the 5 key pillars.

Policy	Consistency of scheme
<p><b>Pillar 3 – Build More Homes aims to support the building of new homes and outlines the Government objective “to ramp up delivery of housing from its current under-supply across all tenures to help individuals and families meet their housing needs”.</b></p> <p><b>This Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021.</b></p> <p><b>The plan outlines a number of key steps that should be taken to deliver on the pillar 3 objective including:</b></p> <p><b>Planning reforms</b></p> <p><b>Putting in place a National Planning Framework and land management actions</b></p> <p><b>Efficient design and delivery methods to lower housing delivery costs</b></p> <p><b>Measures to support construction innovation and skills.</b></p>	<p>The location and suitability of the subject site, as well as the proposed mix of dwellings, including the social housing component, ensures that the subject proposal will contribute positively to meeting the pillar 3 objective of doubling the completion level of additional homes in the next four years to deliver over 25,000 homes on average per annum.</p> <p>The proposed development falls under the Large-scale Residential Development planning process aimed at fast tracking the delivery of much needed housing. In addition, as outlined below, the proposal is consistent with the National Planning Framework and its stated aim of consolidating new population and housing growth within the footprint of the main towns and cities.</p>

## Housing for All - A New Housing Plan for Ireland

This is the government's housing plan to 2030 to improve Ireland's housing system and deliver more homes of all types for people with different housing needs. The government's overall objective is that every citizen in the State should have access to good quality homes.

Policy	Consistency of scheme
<p><b>Housing for All aims to address to the current shortage and affordability of residential accommodation across the county by delivering.</b></p>	<p>The proposed development will contribute an additional 224 no. residential units to the existing housing stock in Killarney. Of these 22 will be allocated for social/affordable housing under Part V of the Planning</p>

- 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

and Development Acts 2000 to 2020 as amended by the Affordable Housing Act 2021.

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.

## Climate Action Plan 2024 (CAP24)

This is the second 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
<p>It recognizes residential building as a key sector in terms of emissions, representing 9.7% of total emissions.</p> <p>CAP24 sets out further policies, measures and actions to close this gap and ensure compliance with our carbon budgets and sectoral emissions ceilings as adopted by the Government in 2022.</p> <p>Ireland has reduced the share of national emissions from the built environment sector from 13% of total emissions in 2005 to 11.1 % in 2022, despite a large increase in our building stock over the same period.</p> <p>CAP24 sets out that all new dwellings are to be designed and constructed to NZEB standard.</p> <p>That heat pumps are to be installed in 45,000 existing and 170,000 new dwellings by 2025, up to 400,000 existing and 280,000 new dwellings by 2030.</p>	<p>In line with this CAP24 target all houses in the proposed development will have heat pumps to the rear gardens, with duplex and apartment units having heat pumps to balconies.</p> <p>All new dwellings are in line with the NZEB standard.</p>



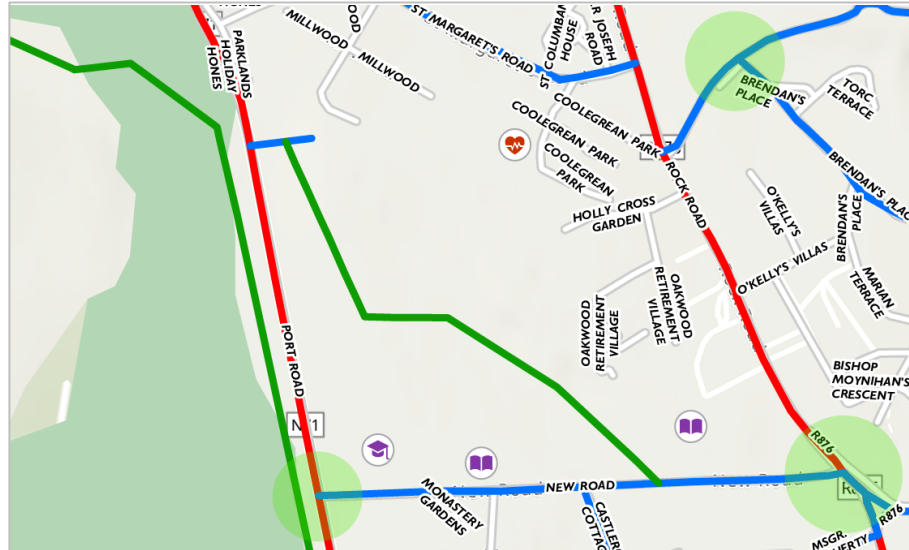
**Project Ireland  
2040: National  
Planning  
Framework**

The National Planning Framework (NPF) outlines the policies and objectives for development in Ireland up to 2040 given the expected population growth of 1 million people. 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
<p><i>National Policy Objective 3A-Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements</i></p> <p><i>National Policy Objective 3C-Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.</i></p> <p><i>National Policy Objective 4 - 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.</i></p> <p><i>National Policy Objective 11 - 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.</i></p> <p><i>National Policy Objective 32 - To target the delivery of 550,000 additional households to 2040.</i></p> <p><i>National Policy Objective 33 - To prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.</i></p> <p><i>National Policy Objective 35- 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</i></p> <p>The plan also outlines 10 national strategic outcomes which include</p> <ul style="list-style-type: none"> <li>• Compact Growth</li> <li>• Sustainable Mobility</li> <li>• Enhanced Amenity and Heritage</li> <li>• Access to Quality Childcare, Education and Health Service.</li> </ul>	<p>The proposed development is consistent with all strategic aims and objectives within the NPF.</p> <ul style="list-style-type: none"> <li>- The subject site is located on lands within the existing footprint of Killarney, a key town, in general close proximity to the town centre. (c. 1000m from High Street).</li> <li>- The proposed development is of high-quality design in close proximity to services and facilities in the area. It will provide for a mix of people, and provide sustainable links to local schools, hospitals, a library, comparison and convenience stores plus recreational facilities notably Knockreer Playground and Killarney National Park.</li> <li>- Objective 33 of the NPF emphasizes 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 established 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 public transport. Furthermore, it will promote sustainable mobility across the site and to other areas.</li> <li>- The proposed design aims to increase the residential density of the proposal through the use of townhouses, duplex/apartments and apartments of 3 – 4 storeys in height.</li> <li>- The proposed development of an infill site will contribute towards the achievement of compact growth in Killarney, at a sustainable location adjacent to the town centre, amenities and childcare, education and health service.</li> </ul>

## 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 plan incorporates existing and planned cycle routes such as greenways and blueways. As outlined above, there are two separate route classifications planned within the site under CycleConnects; an 'Urban Secondary' route and a 'Greenway' route with a 'Urban Primary' route also running along Port Road.

The connectivity proposal of the proposed development are aligned with these CycleConnects plans and make provision for the delivery of a minimum 3m wide shared surface along Port Road extending from a new uncontrolled pedestrian crossing to the Fossa Cycleway in the north as far as the junction of Port Road and New Road to the south. The proposed new amenity pathway within the subject site, designated as a 'Green Link' has also been designed as part of the proposed development on the site which connects the site entrance in the north-west to the south-east of the site via the natural landscape and generally follows the same route as the proposed greenway in the CycleConnects map.

# S. 28 Ministerial Guidelines & Urban Design Manual

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”.*

## Sustainable and Compact Settlements – Guidelines for Planning Authorities 2024

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
<p><u>Table 3.5 Areas and Density Ranges Key Towns and Large Towns (5,000+ population)</u></p> <p><i>Key Town / Large Town - Centre and Urban Neighbourhood</i></p> <p>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.</p> <p><i>Key Town / Large Town - Suburban/Urban Extension</i></p>	<p>The subject site is located in transitional lands between an urban neighbourhood and a suburban area of Killarney, a Key Town. This is reflected in the proposed density of 47.1 dph, which is within both density ranges as set out in the Guidelines, 40 dph – 100 dph (net) for urban neighbourhoods and 30 dph to 50 dph (net) for suburban areas.</p> <p>Given the presence within the site of an archaeological feature and its proximity to a number of protected structures along Port Road, it is considered that the proposed density is appropriate for the subject site. This approach is in line with Section 3.3.4 of the Guidelines.</p>

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

#### 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 2023, all units achieve a minimum separation distance of 16m between opposing, above ground floor windows, serving habitable room at the rear or side of dwellings. The majority of units exceed this separation distance and achieve the traditional 22m minimum distance.

Where a 16m distance is not achieved, no opposing windows serving habitable rooms are proposed and suitable privacy measures have been designed into the scheme. This approach is considered acceptable in the Sustainable and Compact Settlements Guidelines for Planning Authorities 2024.

The Guidelines notes that the requirement for set separation distances has to an extent been made redundant by computer based design programmes to model outcomes in relation to sunlight, daylight and privacy. The enclosed Daylight and Sunlight Assessment prepared by DK Partnership concludes that all rooms tested are in compliance with the minimum internal daylight provision as set out in the BRE Guide and BS EN 17037 (National Annex).

## SPPR 2 Minimum Private Open Space Standards for Houses

In addition the Guidelines promote the following:

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

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

Table 5.1 Minimum Private Open Space Standard for Houses

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

## 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 maximum 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.

## SPPR 3 - Car Parking

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

## SPPR 4 - Cycle Parking and Storage

Quantity – in the case of residential units that do not have ground level open space or have smaller terraces,

As set out in the enclosed Quality Housing Assessment prepared by Deady Gahan Architects, the proposed scheme complies with the Guidelines and uniformly exceeds the minimum private open space. The public open space provision at 15% falls within the 10% - 15% range in line with Policy and Objective 5.1.

Car parking provision of 320 no. spaces for 224 no. proposed units, as set out in the enclosed Parking Allocation drawing prepared by Deady Gahan Architects, is at or below the intermediate and peripheral locations' maximum car parking standard of 2 spaces per unit. The allocation comprises 2 no. spaces being provided for 3 bed and larger houses, 1 no space for each 2 bed house and for each of the the duplex/apartment units. 0.8 no. spaces are provided per unit in the Block J, K and L apartments. Overall 8 no visitor spaces are provided for the housing units across the scheme, with an additional 6 mobility spaces, 26 unallocated EV charging spaces and 8 no. creche spaces being provided.

350 cycle spaces have been allocated for the duplex/apartments (Blocks 1-4), apartments (Block J, K, L)

a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking shall also be provided.

and the creche in this scheme. This exceeds the general minimum requirement for cycle spaces as outlined in the 2024 Guidelines.

This is based on the following calculation:

- There are 26 no. duplex units which are not at ground floor with access to private amenity space where cycles can be stored. Of these 14 no. are 2 bed and 12 no. are 3 bed units. This gives rise to a requirement for 64 resident spaces and 13 visitor spaces. The provision of 100 spaces for the duplex units is in excess of the 77 no. required under the guidelines.
- The 96 no. 1 bed (16 no.) and 2 bedroom (80 no.) units in apartments in Blocks J, K and L give rise to a resident cycle space requirement of 176 spaces and a visitor requirement of 48 spaces. The provision of 230 spaces for Blocks J, K and L is in excess of the 224 requirement in line with the guidelines.
- In addition, a further 20 no. spaces are provided for the creche use.

The enclosed technical assessments carried out by DK Partnership have 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).

### 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.

## Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities 2022

These guidelines update the Sustainable Urban Housing: Design Standards for New Apartments guidelines, originally published in 2015 and revised in 2022 refer to the need to significantly increase supply as a key pillar of the overarching Rebuilding Ireland Housing Action Plan. The guidelines indicate that urban areas are the most suitable locations for apartments and divide these areas into 3 categories: 1. Central and/or Accessible Urban Locations, 2. Intermediate Urban Locations, 3. Peripheral and/ or Less Accessible Urban Locations.

Policy	Consistency
Section 2.4 of the Guidelines define Intermediate Urban Locations' as	As stated in the Guidelines, the range of locations is not exhaustive. In terms of housing mix, the proposed

- Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;
- Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;
- Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services.

These definitions are meant to be interpreted as typical rather than 'exhaustive' and the Guidelines indicate that the full range of locations 'will require local assessment that further considers these and other relevant planning factors'.

The Guidelines contain various Specific Planning Policy Requirements and objectives that apply to the proposed development.

development is part apartments only reflecting viability and local housing demand requirements. Killarney is a town with unique characteristics. While the subject location would not meet the definition of an 'intermediate urban location' in respect of proximity to high frequency bus or public transport services, it is generally within a 1 km walk of the town centre and we consider it could be interpreted to meet the definition on that criterion.

At 47.1 units / ha the density of the scheme is in line with the broadly suggested 45 units / ha. This density calculation is based on the Net Site Area calculation as set out in Compact Settlement Guidelines 2024. This stipulates that areas with topographic constraints or environmental constraints such as the presence of an archaeological feature, requiring a set-back, be excluded from the calculation. The density is considered appropriate in view of a number of other site-specific 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 existing residential amenities.

#### Specific Planning Policy Requirement 3

##### Minimum Apartment Floor Areas

- Studio apartment (1 person) – 37 sq. m
- 1-bedroom apartment (2 persons) – 45 sq. m
- 2-bedroom apartment (4 persons) – 73 sq.m
- 3-bedroom apartment (5 persons) – 90 sq. m

All apartments to be provided within the scheme are 1-3 bedroom and all are in excess of the minimum required floor areas, with over 80% of the duplex/apartment units in Blocks 1 – 4 exceeding the minimum area by over 10%, and 54% of the apartment units in Blocks J,K,L exceeding it by over 10%, as outlined in the accompanying Housing Quality Assessment prepared by Deady Gahan Architects.

#### Specific Planning Policy Requirement 4

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply

- (ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

As outlined in the accompanying Housing Quality Assessment prepared by Deady Gahan Architects, all houses and duplex/apartment units in Blocks 1 – 4 are at least dual aspect. The majority of the 96 no. apartment units (54%) in Blocks J, K and L are dual aspect. Single aspect units are located in different areas around the Blocks overlooking the central urban plaza and the surrounding environment.



Specific Planning Policy Requirement 5

Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.

Ground floor level to ceiling heights of 2.7m are provided for in the proposed apartments and ground floor duplex apartment units in line with the guidelines.

A general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units.

350 cycle spaces have been allocated for the duplex/apartments (Blocks 1-4), apartments (Block J,K,L) and the creche in this scheme. This exceeds the general minimum requirement for cycle spaces as outlined in the Apartment Guidelines for planning authorities 2022.

This is based on a calculation of 26 no. 2 bed (14 no.) and 3 bed (12 no.) duplex apartments which are not at ground floor with access to private amenity space where cycles can be stored. This gives rise to a requirement for 64 resident spaces and 13 visitor spaces. The provision of 100 spaces for the duplex units is in excess of the 77 no. required under the guidelines.

The 96 no. 1 bed (16 no.) and 2 bedroom (80 no.) units in apartments in Blocks J, K and L give rise to a resident cycle space requirement of 176 spaces and a visitor requirement of 48 spaces. The provision of 230 spaces for Blocks J, K and L is in excess of the 224 requirement in line with the guidelines.

In addition, a further 20 no. spaces are provided for the creche use.

Minimum floor areas for private amenity space

One bedroom\_ 5 sq m

Two bedroom- 7sqm

Three bedroom- 9sqm

All apartments within the scheme are provided with private amenity space in the form of balconies and patios which are all in excess of the minimum required standards.

Urban  
Development and  
Building Heights:  
Guidelines for  
Planning  
Authorities

The guidelines published in August 2018 have arisen from a recognition that the ambitious targets contained within the NPF, of future growth within the existing footprint of our cities and town will not be met unless developments of greater height and scale are supported by the Planning Authorities. The guidelines refer to the traditional building heights in our urban areas which have been limited and generally low rise in terms of height. The need to secure compact and sustainable urban growth



forms will require the reuse of brownfield and infill sites that are located in well serviced urban locations. The guidelines advocate that our cities and towns must grow upwards, not just outwards, if we are to meet the many challenges ahead.

Policy	Consistency
<p>The guidelines refer to locations that would be considered outside city and town centres and inner suburbs, i.e. the suburban edges of towns and cities, which typically now include town-houses (2-3 storeys), duplexes (3-4 storeys) and apartments (4 storeys upwards).</p> <p>The application must satisfy a number of development management criteria across a range of scales:</p> <ul style="list-style-type: none"> <li>▪ At the scale of the relevant city/town</li> <li>▪ At the scale of the district/neighbourhood</li> <li>▪ At the scale of the building /building</li> </ul>	<p>The site is located within a general walking distance of the Killarney Town Centre. The development is predominantly comprised of 2 – 3 storey houses and duplex buildings, in keeping with the character of the existing residential development to the north and west of the site. The height of the proposed 4 storey apartments, J, K and L, to the south-east of the site is appropriate in view of the site’s topography, the adjacency of this portion of the site to the town centre, and the increased height of the existing adjacent apartment developments. The application is accompanied by a Landscape and Visual Assessment prepared BSM Landscape Architects which indicates that a high level of visual integration has been achieved by the scheme design.</p> <p>The site is within 15 minutes walking distance of the Killarney Bus and Train Stations. The nearest bus stop is on Rock Road, which is less than a 5 minutes’ walk from the subject site. This stop is serviced by a number of local routes including the 40, 14, 279A. These all stop at Killarney Bus Station. While not very frequent, the level of services is typical of a town of this size.</p> <p>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. The proposed finishes provide for three distinct character areas integrated by simplified palettes of modern colours and durable materials. The apartment element of the scheme is block based, with articulated facades and extensive fenestration to avoid monolithic forms. The proposed infill development will result in increased cohesion in the wider area by bringing underutilized lands into active use. The resulting thoroughfares and public space will provide greater permeability between existing adjoining neighbourhoods, the town centre, education facilities and local amenity areas.</p>
<p>SPPR1 -</p> <ul style="list-style-type: none"> <li>▪ In accordance with Government policy to support increased building height in locations with good public transport accessibility, particularly town/ city</li> </ul>	<p>The proposed development site is considered suitable for the proposed modest increase in scale given its pivotal role in enhancing local connectivity and its sustainable location.</p>

cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.

The proposed 4-storey apartments comply with the Urban Development and Building Heights Guidelines for Planning Authorities 2018. The ministerial guidelines emphasize 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.

The subject lands are located within the Key Town of Killarney. The proposed development is consistent with SPPR1 policy in view its definition as an accessible infill site within the existing urban footprint in a key settlement earmarked for growth.

#### 1. SPR 4 –

**It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:**

- the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;
- a greater mix of building heights and typologies in planning for the future development of suburban locations; and
- avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.

The “Residential Development in Urban Areas (2007)” have been replaced by the “Sustainable Residential Development and Compact Settlement Guidelines” in 2024. In relation to the 2007 Guidelines the subject site could be defined as an ‘Outer Suburban / Greenfield Site’ where net residential densities in the general range of 35-50 dph should be encouraged generally.

In accordance with the 2024 Guidelines the subject site is located in transitional lands between an ‘Urban Neighbourhood’ and a ‘Suburban Area’ of Killarney, a Key Town. This is reflected in the proposed density of 47.1 dph, which is within both density ranges as set out in the 2024 Guidelines, 40 dph – 100 dph (net) for urban neighbourhoods and 30 dph to 50 dph (net) for suburban areas.

In addition to the presence within the site of an archaeological feature, the emphasis in the design on retaining important vistas across the site, on protecting the amenity of a number of protected structures along Port Road, and ensuring no impacts occur on the nearby National Park, it is considered that the proposed density is appropriate for the subject site. This approach is in line with Section 3.3.4 of the Guidelines.

Mono-type building designs are avoided by the mix of unit types, incorporating a number of different house designs and a range of duplex and apartment building designs.

**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
<p><b>Appendix 2:</b></p> <p><b>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.</b></p> <p><b>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</b></p> <p><b>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</b></p>	<p>The proposed development is a medium residential scheme consisting of 224 units off Port Road, Killarney. provision has been made on site for a 46-child place creche in accordance with established standards for demand arising from 2+ bedroom residential units in the scheme.</p> <p>The rationale for providing this quantum of childcare is outlined in the accompanying Statement of Rationale for Childcare Provision prepared by HW Planning. This has considered the existing geographical distribution of childcare facilities in the area as well as the demographic profile. This quantum of provision was accepted by ABP in relation to the previous SHD application for 228 no. dwelling on this site. (ABP-312987-22).</p>
<p><b>Circular PL 3/2016</b></p> <p><b>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.</b></p> <p><b>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.</b></p>	<p>This has been acknowledged as part of scheme development which provides for on-site provision of a creche.</p>

**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
<ol style="list-style-type: none"> <li>1. Integrated Street Networks</li> <li>2. Movement and Place</li> <li>3. Permeability and Legibility</li> <li>4. Management</li> <li>5. Movement, Place and Speed</li> <li>6. Streetscape</li> <li>7. Pedestrian and Cyclist Movement</li> <li>8. Carriageway Conditions</li> </ol>	<p>This Large-scale Residential Development application is supported by a detailed Traffic &amp; Transport Assessment (TTA) and a Statement of DMURS Compliance produced by MHL Consulting Engineers which addresses the relevant policies and principles listed in the Design Manual for Urban Roads and Streets, 2019 in order to create a balanced and attractive street and road network for the proposed development.</p>

# Regional Planning Policy

## Southern Regional Assembly: Regional Spatial and Economic Strategy

The purpose of the Regional Spatial and Economic Strategies (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.

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
<p>To achieve the vision for key towns, under RPO18 the RSES has provided guiding principles on how Killarney can achieve this:</p> <ul style="list-style-type: none"> <li>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;</li> <li>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</li> </ul>	<ul style="list-style-type: none"> <li>- 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 to meet the needs of people employed in the training/ service sector.</li> <li>- The proposed infill development within the built-up footprint of the settlement will sustainably support the compact development of Killarney.</li> </ul>

- 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, 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 proposal will provide the critical mass necessary to encourage the further improvement of the rail and public transport infrastructure.
- It 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 Irish Water indicates, there is existing water and wastewater capacity to support the immediate development of the subject site. The enclosed AA Screening / NIS reports, prepared by Malachy Walsh and Partners concludes that the proposed development will not give rise to water quality impacts on the ecosystem of the Killarney National Park.

**Transitional Local Authority Population projections to 2031:**

South-West <sup>41</sup>					
	2016	2026	Uplift <sup>39</sup>	2031	Uplift <sup>40</sup>
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.

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:

- A Flood Risk Assessment

- **Areas with flood potential**

- Ecology Assessment
- Archaeological and Cultural Heritage 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 and the Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC. The application is accompanied by an Environmental Impact Assessment Screening Report and an Appropriate Assessment Screening and Natura Impact Statement assessing the impacts of the development on these European Sites

**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 prioritise the delivery of compact growth and sustainable mobility as per the 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 in an area that is well served by existing public transport and pedestrian linkages. The development will promote non-car modes of transport.

The proposed public realm improvements will provide an enhanced level of amenity in the area and will improve the overall pedestrian and cycle experience.

# Local Planning Policy

## Kerry County Development Plan 2022-2028

The Kerry County Development Plan (KCDP) outlines objectives and parameters for housing development in the county up to the year 2028 and beyond. The key principles underpinned in the plan include addressing climate change and achieving a sustainable future.

Chapter 3 of the Plan outlines the Core Strategy of the county over the lifetime of the plan. The strategy places an emphasis on achieving sustainable settlements centered 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

#### Objective KCDP 3-2

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

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;

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)

Section 3.11 - 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

### Consistency

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 county, the KCDP 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 224 units contributes positively towards achieving these population targets and housing requirement figures.

The proposed development will contribute towards achieving the strategic aims of the Kerry County Development Plan and deliver compact development within an existing under-





utilised site within the settlement boundary.

The density of the scheme, at 47.1 units / ha, is an appropriate scale given the site-specific topography 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.

**Objective KCDP 4-10**  
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**  
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**  
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**  
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**  
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 duplexes and is in accordance with guidance outlines Guidelines.

The development promotes sustainable methods of transport including walking, cycling and public transport. The Connectivity Map enclosed as an Appendix to this statement and the information in the accompanying Traffic and Transportation Assessment prepared by MHL & Associates 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 a bus stop (Rock Road) which offers bus routes to Killarney Town Centre, Killarney Bus and Train Stations, employment centres (eg the Liebherr site) and other major employment centres notably Tralee, Cork City, Limerick City. It also

**Objective KCDP 6-1**

Develop and support vibrant sustainable communities in Kerry where people can live, work, and enjoy access to a wide range of community, health, educational facilities, and amenities, suitable to all ages and needs, in both urban and rural areas, thereby supporting an enhanced quality of life for all people.

provides bus services to the rural areas of Waterville and Cahersiveen.

**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.

The development provides for a central village green with natural play features and a number of smaller green areas and incidental play areas. In addition, the existing stream has been utilised to create a green link corridor and provision is made for a green spine along the eastern boundary. The layout is designed around permeable pedestrian linkages to other key facilities and parks 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.

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

One of the key factors of the proposed development is the protection and enhancement of biodiversity and the natural environment. The existing hedgerows, trees and stream are utilised to create a linear green corridor to the south of the site. This area incorporating the existing stream 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. Some foraging bat contact was recorded on site and there is

an active Badger sett. The enclosed Ecological Impact Assessment Report prepared by Malachy Walsh and Partners set out a suite of construction measures incorporated into the CEMP to mitigate against any potential impacts. These include exclusion zones varying in size at different seasons, noise and light impact management measures and screening vegetation retention and enhancement. Similar operational measures have been incorporated into the layout design.

#### Objective KCDP 4-40 - Guidelines

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 Deady Gahan Architects accompanies this submission which addresses the proposed developments compliance with the 4 no. Key Indicators of Quality Urban Design and Placement as set out in the 2024 Compact Settlement Guidelines. In addition, the proposed design is assessed against the 12 criteria in the Urban Design Manual.

The enclosed Housing quality Assessment prepared by Deady Gahan Architects 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 emphasize 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

	<p>typically now include apartments of 4 storeys and upwards.</p>
<p><b>Objective KCDP 6-2 - Community Infrastructure</b>  <b>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.</b></p> <p><b>KCDP 6-3 – Sustainable Communities</b>  <b>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 features and supports the planting of native species in green and public areas.</b></p>	<p>A range of public amenity areas will be provided. In addition, the provision of the creche will also serve as an important community outlet.</p> <p>The existing hedgerows, trees and stream are utilised to create a linear green corridor to the south of the site. This area incorporating the existing stream will form amenity and biodiversity corridors which will serve and connect all areas of the site and natural areas beyond.</p>
<p><b>Objective KCDP 6-6 – Energy Performance</b>  <b>Require new buildings to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD).</b></p>	<p>A Building Lifecycle Report, has been prepared by Deady Gahan, which sets out how the proposed scheme achieves this requirement.</p>
<p><b>Objective KCDP 6-16 - Density</b>  <b>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).</b></p>	<p>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.</p> <p>In accordance with the replacement 2024 Compact Settlement Guidelines the subject site is located in transitional lands between an ‘Urban Neighbourhood’ and a ‘Suburban Area’ of Killarney, a Key Town. This is reflected in the proposed density of 47.1 dph, which is within both density ranges as set out in the 2024 Guidelines, 40 dph – 100 dph (net) for urban neighbourhoods and 30 dph to 50 dph (net) for suburban areas.</p> <p>At a proposed density of 47.1 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</p>

**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.

**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 their own homes longer and function better as they face aging-related disabilities

**Objective KCDP 6-23** 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).

**Objective KCDP 6-36 – Open Space**

Provide multifunctional open spaces at locations deemed appropriate providing for both passive and active uses.

its proximity to key educational, health and amenity facilities and the availability of multi-modal transportation options.

The housing mix proposed provides for a variety of house types and sizes plus apartments and duplexes 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 22 Part V units. A Part V Proposal is enclosed with the application.

The proposed development is brought forward in accordance with the county Taking in Charge Policy.

The development promotes sustainable methods of transport including walking, cycling and public transport. The Connectivity Map enclosed as an Appendix to this statement and the information in the accompanying TTA prepared by MHL & Associates demonstrate the site's current and future connectivity with places of work, retail, services, educational, recreational amenities and community facilities in the surrounding areas.

A Universal Design Statement has been prepared by Deady Gahan, in accordance with Objective KCDP 6-21 and Objective KCDP 6-23.

The development provides for a central village green with natural play features and a number of smaller green areas and

	<p>incidental play areas. 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.</p>
<p><b>Objective KCDP 7-9 - Housing Mix</b></p> <p><b>Promote integration of social housing and ensure a housing mix within developments in order to promote a socially balanced and inclusive society.</b></p>	<p>The housing mix proposed provides for a variety of house types and sizes plus apartments and duplexes and is in accordance with the CDP objective and the Guidelines on Sustainable Residential Development and Compact Settlements. The proposed scheme will consist of 224 residential units comprising 76 no. dwelling houses (30 no. 4-bed, 38 no. 3-bed and 8 no. 2-bed semi-detached and terraced dwellings), 52 no. apartments / duplex units comprising 14 no. 1-bed, 26 no. 2-bed and 12 no. 3-bed units provided and a further 96 no. apartments (consisting of 16 no. 1-bed and 80 no. 2-bed) over 3 apartment blocks.</p> <p>22 units have been allocated as social dwellings which further contributes to creating a socially balanced and inclusive society.</p>
<p><b>Objective KCDP 7-8 - Density</b></p> <p><b>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).</b></p>	<p>The proposed development has a net density of 47.1 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.</p>
<p><b>Objective KCDP 7-20</b></p> <p><b>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.</b></p>	<p>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.</p>

	<p>Based on the demographic profile of Killarney we envisage that the primary market for the proposed apartments in the Port Road scheme will be retirees and young professionals working in the many employment centres within Killarney.</p>
<p><b>Objective KCDP 8-24 - Archaeological Heritage</b></p> <p>(i) <b>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.</b></p> <p><b>Objective KCDP 8-40 – Record of Protected Structures</b></p> <p><b>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.</b></p>	<p>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 and associated Archaeological Management Plan prepared by John O'Connor and Rubicon Heritage.</p> <p>A grouping of protected structures known as the Port Cottages (21400804 - 21400806) are located to west of the subject site, c. 50 m– 60m from the site boundary. The design of the proposed development has been carefully considered having regard to these with generous setback distances provided for to the nearest proposed dwellings. The existing mature intervening hedgerows means there is little interrelationship between these cottages and the subject site. This will be further bolstered by means of the proposed boundary planting within the application site.</p>
<p><b>Objective KCDP 6-52 - Childcare</b></p> <p><b>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.</b></p>	<p>As per Objective KCDP 6-52 a 46-child place crèche is proposed at the north 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.</p> <p>A Statement of Rationale on Childcare Provision is enclosed with this application.</p>

**Objective KCDP 6-33 - Play**

**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 central Village Green 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 Brady Shipman Martin.

**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 Report prepared by Brady Shipman Martin 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**

**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 Report prepared by Brady Shipman Martin 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 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 notably national and secondary schools, community hospital and Knockreer Playground.

**Objective KCDP 14-29 - National Primary and Secondary Roads**

All safety issues in relation to traffic and road infrastructure have been assessed



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

in the enclosed Road Safety Audit produced by MHL which accompanies this application.

**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 Site-Specific Flood Risk Assessment prepared by Donal Moynihan, Chartered Engineer concluded that there are minimal risks of flooding on the subject site and the proposed residential development avoids significant risks of flooding in line with the Ministerial Guidelines. Nonetheless, the proposed site layout has been designed having regard to the OPW PFRA mapping.

**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 existing hedgerows, trees and stream are utilised to create a linear green corridor to the south of the site. This area incorporating the existing stream 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. Some foraging bat contact was recorded on site and there is an active Badger sett. As the enclosed Ecological Impact Assessment Report prepared by Malachy Walsh and Partners outlines, appropriate buffer zones and habitat retention and enhancement measures have been incorporated into the proposed layout to mitigate against any potential impacts.

**Objective KCDP 11-42 Light Pollution**

In response to the sole refusal reason under the SHD, a focused program of

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**

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.

additional ecology work has been advanced inclusive of the appointment of a dedicated bat specialist; completion of additional bat survey work and engagement with National Parks and Wildlife Service.

The existing and proposed future lighting context has been investigated.

Engagement has taken place with NPWS and lighting personnel in Kerry County Council and the existing lighting on Port Road has been modelled. Informed by input from the ecologists, a new lighting scheme has been developed for Port Road which demonstrates an improvement on the existing ('do nothing') scenario in respect of light spill into Killarney National Park. This will be implemented alongside the committed upgrades to Port Road.

**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.

As part of the sustainable surface water management strategy a SUDS Arbor System is proposed beneath the surface of all new street trees and planting beds. Tree planting in paved areas will require tree pits, with root barriers and pavement construction that is supported without putting load onto the rootzone below. The construction specification for tree planting pits will incorporate these measures to ensure the best possible environment for street trees to be protected and flourish

**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. The single vehicular access to the site will be via Port Road where appropriate site lines are available to provide for safe access and egress. There is an existing cycle path which runs parallel to Port Road in Knockreer Park. As part of this scheme

and following consultation with both Kerry County Council and Transport Infrastructure Ireland, it is proposed to install a minimum 3 m wide shared surface along Port Road. This minimum 3 m shared surface will replace the existing 1.1m footpath on the eastern side of Port Road by means of a build out to reduce the width of the road carriageway. There will be no impact on existing properties on Port Road. To the north of the development entrance, it is proposed that the shared surface will terminate at a new uncontrolled pedestrian crossing to the Fossa Cycleway. To the south of the development entrance the shared surface will extend as far as the junction of Port Road and New Road. This facility will provide both a pedestrian and cyclist link between Killarney Town and the Fossa Cycleway/National Park. The area has been red-lined and included within the application for certainty in approach.

**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	
<b>Dwelling House</b>					
Town/village	1 Dwelling	0	1	2	1
Housing Estate	1 Dwelling + visitor space/per dwelling	0 0	0 0	2 0.5	1 0
<b>Apartment</b>	Per bedroom	0	1	1	1

<b>Childcare Facilities</b>	Per 4 children	0	0	1	1
	Per staff member	-	-	1	

8 parking spaces have been provided for the childcare facility staff use with a separate drop-off parking area for parents use. This is a reduction on the maximum provision set out in the standard.

The subject site falls within Area 3 ie within the settlement boundary but not within the town centre. 2 car parking spaces are proposed per house, with the exception of the 2 bedroom terrace houses where 1.5 parking spaces are allocated. For the duplex/apartment units 1.25 parking spaces are allocated and for the apartments 1 car parking space per apartment has been provided. This provision is in line with or less than the maximum standards as set out in the Kerry County Development Plan.

Due to the sustainable location of the subject development and the desire to achieve modal shift away from the private

	<p>car, the level of provision is consistent with Ministerial Guidelines.</p> <p>In addition, 350 cycle 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.</p>
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**CDP Volume 6 Development Standards - Residential**

Policy	Consistency
<p><b>1.5.1.1: Design Statement</b></p> <p><b>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)'.</b></p>	<p>An Architectural Design Statement prepared by Deady Gahan Architects accompanies this submission. The Housing Quality Assessment document also prepared by Deady Gahan Architects addresses details and calculations on plot ratio and site coverage.</p> <p>Design considerations for energy consumption are outlined in the Energy and Carbon Emissions and the Low Energy Technologies sections of the Building Lifecycle Report prepared by Deady Gahan Architects</p> <p>The proposed houses and apartments will be contemporary in style complemented by simple render and brick finishes on the majority of facades. As the Architectural Design Statement outlines there 3 no. complementary but distinct character areas proposed, with building heights increasing southwards reflecting the topography of the site and proximity to the town centre.</p>
<p><b>1.5.2: Density</b></p>	<p>The application site is an 'Outer Suburban / Greenfield Site' as it complies with Section 5.11 of the Sustainable</p>

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

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

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

- Proximity to neighbouring and district centres.
- Proximity to public transport bus stops.
- The extent to which the design and layout follows a coherent design brief resulting in a high-quality residential environment. • Compliance with qualitative and quantitative criteria.
- The extent to which the site may, due to its size, scale and location, propose its own density and character, having regard to the need to protect the established character and amenities of existing adjoining residential areas.
- Existing topographical, landscape or other features on the site.
- The capacity of the infrastructure, including social and community facilities, to absorb the demands created by the development. The same criteria will be applied to development proposals involving an increase in density on existing housing sites

### 1.5.3 Dwelling Design, Size & Mix

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

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

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

Residential Development in Urban Areas' (2009) guidelines which define such sites as "as open lands on the periphery of cities or larger towns".

The guidelines provide 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 transitional lands between an 'Urban Neighbourhood' and a 'Suburban Area' of Killarney, a Key Town. This is reflected in the proposed density of 47.1 dph, which is within both density ranges as set out in the 2024 Guidelines, 40 dph – 100 dph (net) for urban neighbourhoods and 30 dph to 50 dph (net) for suburban areas.

The proposed residential net density is 47.1 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.

The Design Statement prepared by Deady Gahan Architects and the Planning Statement prepared by HW Planning which accompanies this application address these requirements.

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

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

#### 1.5.4.13 Phasing

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

The enclosed CEMP prepared by MHL addresses this requirement.

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.

#### 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.

The enclosed Traffic and transport Assessment prepared by MHL which accompanies this application. 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, creation of attractive thoroughfares by avoiding spanning rear

The Design Statement prepared by Deady Gahan Architects which accompanies this application addresses this requirement.

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.

The Landscape Design Report prepared by Brady Shipman Martin which accompanies this application addresses this requirement.

The Design Statement prepared by Deady Gahan Architects which accompanies this application addresses this requirement.

#### 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 Deady Gahan Architects which accompanies this application addresses this requirement.

The Landscape Design Report prepared by Brady Shipman Martin which accompanies this application addresses this requirement.

The Landscape Design Report prepared by Brady Shipman Martin which accompanies 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.**

As outlined in the Schedule of Accommodation prepared by Deady Gahan Architects and the Landscape Design Report prepared by Brady Shipman Martin, the provision of 15% 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.



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

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

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

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

#### 1.5.4.6 Private Open Space

The Housing Quality Assessment prepared by Deady Gahan Architects which accompanies this application indicates that the private open space of all houses meets the Compact Settlement Private Open Space minimum requirement. Furthermore, all but 1 house meets or exceeds the CDP minimum private open space requirement as set out

- 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**

- 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.

#### 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).

#### 1.5.4.9 Building Height

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

in Table 1 of the CDP, with 70 of the 76 houses generously exceeding the minimum quantum.

Similarly, all apartment and duplex units meet the requirement set out in the Apartment Guidelines 2023. Furthermore, the majority of the 52 duplex units have private open space significantly in excess of the minimum requirement.

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

As outlined in the accompanying Housing Quality Assessment prepared by Deady Gahan Architects, the total area covered by buildings on the site constitutes 22.4% of the site developable area, excluding public/private open space areas, archaeological buffers, landscape corridors and required circulation space. This is less the maximum figures set in the CDP.

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

Development Management principles and satisfy Development management criteria as contained in the Ministerial Guidance document Urban Development and Building Heights (2018).

#### 1.5.4.10 Minimum Separation Distance

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

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

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

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

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

We note that the 2024 Guidelines for Sustainable Residential In line with the Sustainable and Compact Settlements Guidelines for Planning Authorities 2023, all units achieve a minimum separation distance of 16m between opposing, above ground floor windows, serving habitable room at the rear or side of dwellings. The majority of units exceed this separation distance and achieve the traditional 22m minimum distance. Where a 16m distance is not achieved, no opposing windows serving habitable rooms are proposed and suitable privacy measures have been designed into the scheme. This approach is considered acceptable in the Sustainable and Compact Settlements Guidelines for Planning Authorities 2024.

The Guidelines notes that the requirement for set separation distances has to an extent been made redundant by computer based design programmes to model outcomes in relation to sunlight, daylight and privacy. The enclosed Daylight and Sunlight Assessment prepared by DK Partnership concludes that all rooms tested are in compliance with the minimum internal daylight provision as set out in the BRE Guide and BS EN 17037 (National Annex).

No ground floor windows are less than 1m from the facing boundary and a minimum of 2.2m has been provided between side walls of houses to ensure privacy.

#### 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

The enclosed Boundary Treatment Plan prepared by Brady Shipman Martin fully conforms to this requirement.

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.

#### 1.5.4.12 Waste Management

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

The design of the proposed bin store as indicated in the enclosed Proposed Bin Store Type A and B drawings prepared by Deady Gahan Architects fully conforms to this requirement, as does the apartment bin storage area in the undercroft floor plan.

Bin storage for detached and semi-detached houses is in the gardens to the rear. In the terraced units an enclosed private bin storage area to the front of the houses is included in the design.

#### 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.**

Refer to CEMP prepared by for phasing details provided in accordance with this requirement.

<p><b>1.5.4.14 Services</b></p> <p>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.</p>	<p>Refer to Engineering Report prepared by MHL for services details provided in accordance with this requirement.</p>
<p><b>1.5.4.16 Construction Waste Management Plan</b></p> <p>A management plan for the reuse, recycling or disposal of Construction &amp; Demolition waste will be required to be submitted as part of an application.</p>	<p>Refer to CEMP prepared by for phasing details provided in accordance with this requirement.</p>
<p><b>1.5.5 Apartment Design Standards – requirement to comply with Apartment Guidelines</b></p>	<p>As set out in Section 3 of this document the apartment and duplex units have been designed in full compliance with the Apartment Guidelines.</p> <p>The accompanying Housing Quality Assessment prepared by Deady Gahan Architects, indicates that all apartments/duplexes 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.</p>
<p><b>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.</b></p>	<p>In relation to the parking provision for the apartment and duplex units within the scheme this standard of 1:5 is adhered to with 26 no. EV spaces provided in addition to the 128 no. allocated residential spaces (refer to Parking Allocation drawing prepared by Deady Gahan.</p>

**Killarney Town Development Plan 2022 – 2028 (Volume 2 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
<p>The Strategic Objectives for Killarney include the following:</p>	<p>The proposed development is consistent with all strategic aims and zoning objectives in the</p>

**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.**

Killarney Town Development Plan. The subject site is located within the development boundary of Killarney approximately 1,000 metres from Killarney town centre and is zoned R1 New/ Proposed Residential Phase 1 in the development plan.

The 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 224 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 National Park and providing connectivity.

**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.**

A Building Lifecycle Report, has been prepared by Deady Gahan, which sets out how the proposed scheme achieves energy efficiency and sustainability.

As set out in the Landscape Design Report prepared by Brady Shipman Martin one of the key project drivers is to provide a continuous multifunctional green corridor that incorporates access and movement for people and nature within and off the site and protects and enhances existing landscape features including trees, hedgerows and the Folly Stream.

**KA 20 Maintain and conserve the conservation value of the Killarney National Park as a European site (365 and 4038), a National Park and a UNESCO Biosphere Reserve and the Rivers Flesk and Deenagh (part of a candidate Special Area of**

In line with this requirement an Appropriate Assessment Screening/Natura Impact Statement reporting has carried out for the proposed development by Malachy Walsh

**Conservation (cSAC)) during the lifetime of this plan and to 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.**

**KA 24 Promote the sensitive integration and access to natural heritage and associated recreation facilities, having regard to environmental designations in the area.**

Environmental Consultants to assess whether the proposal is likely to have significant effects on this European site whether within or outside the boundary of the European site.

Licensed Bat Specialist Dr Tina Aughney is part of the project team. She is involved with Bat Conservation Ireland and is a foremost bat expert in the country. She has prepared a specialist paper on the potential for impacts on the LHSB feeding into the AA/NIS reporting. Additional bat survey work has been completed and discussion/consultation has been undertaken with NPWS/DAU at local /regional level via regional ecologist Jervis Goode and Daniel Buckley, Conservation Ranger.

The existing and proposed future lighting context has been investigated. Engagement taking place with lighting personnel in Kerry County Council and the existing lighting on Port Road has been modelled. Informed by input from the ecologists, a new lighting scheme has been developed for Port Road which demonstrates an improvement on the existing ('do nothing') scenario in respect of light spill into Killarney National Park. This could be implemented alongside the committed upgrades to Port Road.

Following liaison with the National Parks and Wildlife Service (NPWS) an indicative planting scheme within the National Park lands was agreed to mitigate against any potential residual light spill arising from vehicles on the proposed access road. The applicant agrees the proposed application of a suitable contribution to facilitate the NPWS to deliver the proposed planting.

A Lighting Impact Assessment on the new design prepared by MHL will accompany the application and confirms there will be no adverse impact on local bat populations.

Malachy Walsh Environmental Consultants have liaised closely with Brady Shipman Martin to ensure the sensitive treatment of natural heritage in the vicinity of the subject site.



**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.**

**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.**

Existing habitats have been maintained and enhanced where possible, in particular the retention and protection of existing trees, hedgerows and the Folly Stream riparian zone have been prioritised, to minimise loss of habitat and commuting routes.

The bioswales are proposed which will combine sustainable surface water drainage with supporting biodiversity in line with the All Ireland Pollinator Plan and a strong attractive visual identity to the new place. In addition, pollinator friendly planting is proposed.

The specific mitigation measures proposed to are outlines in the enclosed EclA prepared by Malachy Walsh and in the Landscape Design Report prepared by Brady Shipman Martin.

The proposed development is supported by a Site-specific Flood Risk Assessment prepared by Donal Moynihan Chartered Engineer. This assessment concludes that there are minimal risks of flooding on this Assessment Site. Therefore, the Residential Development avoids significant risks of flooding in line with the Ministerial Guideline.



**KA 36 Sustainably improve connectiveness throughout the town and sensitively orientate the town to the National Park.**

**KA 55 Support the sustainable development, improved connectivity and accessibility of key features, infrastructure and amenities within Killarney, focussing in particular on trails that encourage walking, cycling and public transportation.**

**KA 63 Strengthen and promote a sustainable relationship and connectivity of Killarney Town as integral to the Killarney National Park.**

As set out in the Landscape Design Report prepared by Brady Shipman Martin one of the key project drivers is to provide a continuous multifunctional green corridor that incorporates access and movement between the town centre to the south and the National Park to the north-west. .

**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 Brady Shipman Martin 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 life for new and existing residents in the area. All open space has 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.

In total there is 7,125 sq.m of usable public open space evenly distributed across the site. There is 1,820 sq.m of communal space provided for the apartment complex and duplex development, in excess of the requirements.

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.

In line with KA 78 and 79 the proposal also provides a continuous multifunctional green corridor that provides linkages between the town centre to the south and the National Park to the north-west.

In line with KA 80 the proposal includes upgrades to Port Road comprising reduction in carriageway widths, provision of shared pedestrian/cycle path and uncontrolled pedestrian crossing, and a pedestrian connection to Millwood Estate.

**Killarney Municipal District Local Area Plan 2018-2024**

The Killarney Municipal District Plan 2018-2024 sets out a comprehensive local planning framework with clear policies and objectives including land use zonings in the interests of the common good for the towns and villages of the Municipal District, except for Killarney Town. However, the Killarney Development Plan 2022 – 2028, Volume 2 of the CDP applies to the subject site which falls within the area formerly administered by Killarney Town Council.

**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
<p>The Climate Action Plan Objectives for Kerry include the following:</p> <p><b>EG1</b></p> <p>Promote climate action projects that support and maximize environmental cobenefits, 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.</p> <p><b>EG2</b></p> <p>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.</p> <p><b>EG3</b></p> <p>Ensure all development underpinned or supported by climate action is planned and implemented in a manner that appropriately considers the potential for environmental co-benefits, potential environmental impacts and environmental protection requirements. No climate action related development project that is likely to have significant negative effects on the receiving environment shall be supported.</p> <p><b>EG4</b></p>	<p>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 National Park. The presence of an archaeological feature, badger setts and a riparian zone within the site have been intrinsic to evolution of the design.</p> <p>The layout design includes a number of features to enhance water holding capacity. Naturalistic bioswales with mixed native planting, trees and species rich grassland fringes are proposed as part of SuDS and to enhance biodiversity. In addition, porous 'grasscrete' is proposed as a paving finish to car parking spaces and carriageway set back areas. In the parking bays bioswale features are also proposed such as street tree planting in pits.</p> <p>The enclosed EclA, 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.</p> <p>As noted above and in the enclosed EclA and NIS, the proposed development has been</p>

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.

#### 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.

#### EG6

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

#### EG7

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

#### EG8

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

#### EG9

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

carefully considered across a range of aspects to ensure that nearby important habitats are protected.

The project design team has worked closely with the County Archaeologist to protect archaeological features on-site. The design team has also been cognisant of the presence of protected structures along Port Road, and the proposed layout has been designed to minimize any impact on the structures.

As outlined in the enclosed ecological material the proposed development is aligned with the provisions of the WFD and the RBMP.

The proposed development has been 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 wetland area to the south.

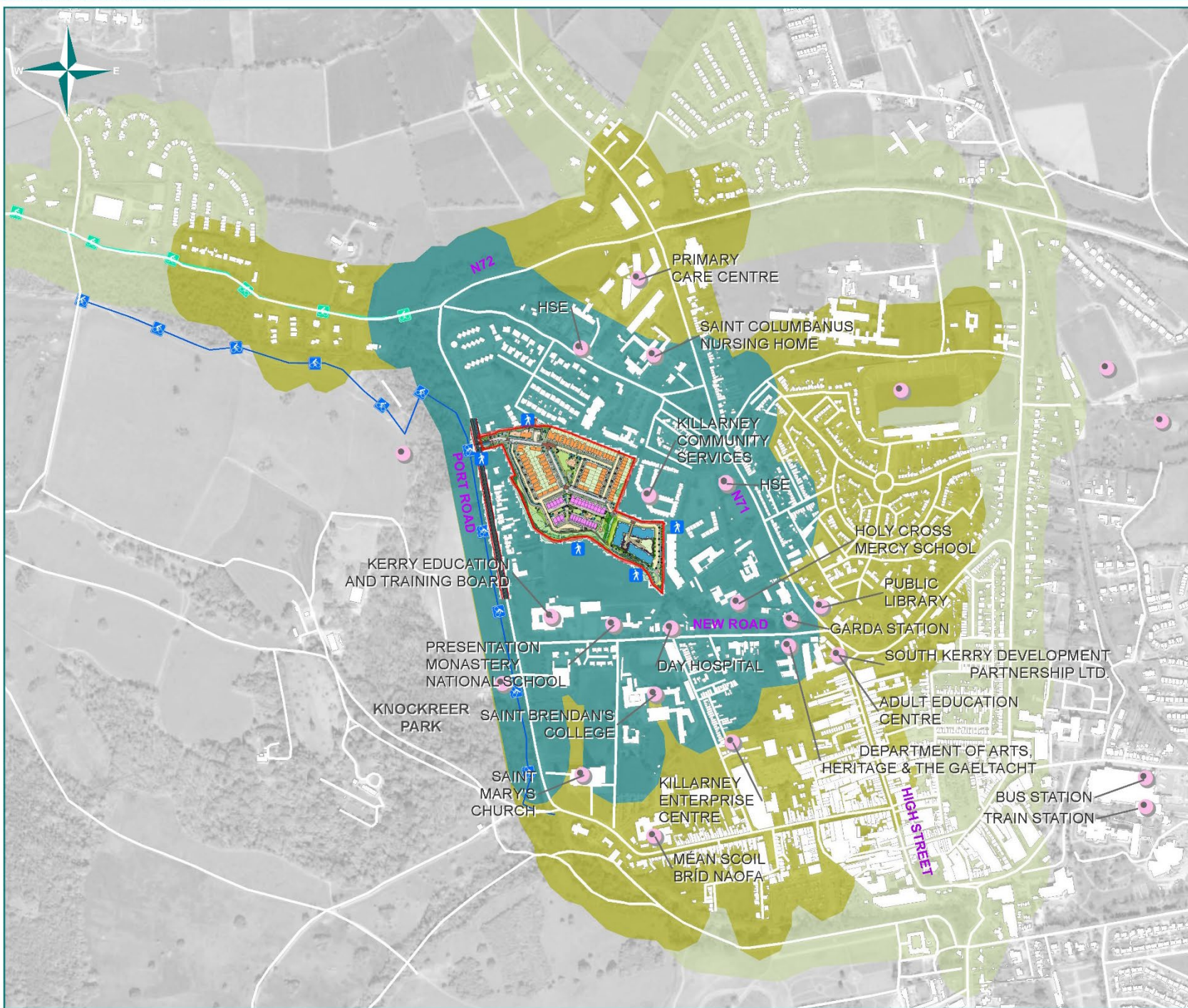
The proposed planting regime enhances existing ecological connectivity.

The accompanying Ecological Impact Assessment (EclA) notes the presence of three invasive species in an area of previously disturbed ground the south-eastern section of the site. Both the EclA and the Construction and Environmental Management Plan set out management plans and state that twill be eradicated and controlled prior to commencement of works.

# Appendix 1 – Connectivity Map







**Legend**

- Indicative Site Boundary
- ↑ Proposed & Potential Future Pedestrian/Cycle Access Point
- Education, Employment or Community Centres
- Cycling Facilities In Vicinity of Proposed Development
  - ⊗ Existing
  - ⊗ Proposed Upgrade
- Walking Travel Time from Pedestrian Access Points
  - 5 minutes
  - 10 minutes
  - 15 minutes

**Figure Title**

Connectivity Map

**Figure No.**

1

**Project**

Proposed Development at Port Road, Killarney, Co. Kerry

**Client**

Portal Asset Holdings

**Scale** 1:7,500

**Page Size** A3

**Revision** A

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