



COAKLEY O'NEILL
town planning

Statement of Consistency

Large Scale Residential Development at

The Ross Road, Killarney

County Kerry

Prepared in July 2025 on behalf of

Homeland Projects Ltd.

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1.0 INTRODUCTION

1.1 This Statement of Consistency has been prepared by Coakley O'Neill Town Planning Ltd. in support of a proposed Large Scale Residential (LRD) development at the Ross Road, Killarney, County Kerry.

1.2 Section 32(b)(2)(ga) of the Planning and Development Act, 2000, as amended, states:

***32B.** (1) A prospective LRD applicant may, once he or she has consulted the appropriate planning authority or authorities in whose area or areas the proposed LRD would be situated in accordance with section 247, request an LRD meeting with that planning authority or authorities.*

(2) A request under subsection (1) shall be in writing, be accompanied by the appropriate fee and include—

....(ga) a statement setting out how the proposed LRD has had regard to the relevant objectives of the development plan or local area plan in whose area or areas the proposed LRD would be situated, and.....

1.3 The subject site is within the Local Authority jurisdiction of Kerry County Council. As such, the applicable local statutory planning policy document pertaining to the development of the site is the *Kerry County Council County Development Plan 2022-2028* (hereafter the Plan). This statement outlines the development proposal's consistency with the objectives set out in this plan.

1.4 The proposed development consists of a largescale residential development (LRD), comprising of 134no. residential dwellings as follows: 65no. houses consisting of 10no. 4-bed dwellings and 55no 3-bed dwellings; 51no. townhouses consisting of 32no. 3-bed units and 19no. 2-bed units; and 18no. apartments consisting of 12no. 2-bed units and 6no. 1-bed units. The proposed development also includes a crèche with capacity to accommodate 102no. children.

1.5 The proposed development will include provision for car parking, including EV charging points and bicycle parking. The proposed development will also include the provision of private, communal, and public open spaces; internal roads and pathways; pedestrian and cyclist routes; hard and soft landscaping and boundary treatments; waste storage; plant; signage; a new vehicular and pedestrian access onto the Ross Road; public lighting; 2no. substations; all associated site development works; and all drainage and foul sewer infrastructure and network works including connections to the existing networks and nature-based SuDS measures. A Natura Impact Assessment (NIS) accompanies the application.

2.0 CONSISTENCY WITH LOCAL PLANNING POLICY OBJECTIVES

Kerry County Development Plan, 2022 – 2028 - Volume 1 – Written Statement

Issue	Policy / Objective	Response
Core Strategy	KCDP 3-2 <i>Support the sustainable growth and prioritise development of the county's settlements in accordance with the Settlement Hierarchy and the Core Strategy.</i>	<p>The proposed development will comprise of the construction of 134no. residential units and a crèche facility.</p> <p>The development has been designed in a compact manner to deliver 134no. residential units within the development boundary of Killarney Town.</p> <p>The Development scale is in keeping with the Key Town designation of Killarney as identified in the RSES. In addition to this, the development will aid in achieving the population growth identified in RSES and Core Strategy of the Plan of 1,277 residential units.</p> <p>The site layout provides for the creation of distinct residential character areas within the scheme, each of which is linked through the green amenity spaces provided. This seeks to create a new and distinct sense of place as well as to ensure a high quality of place in regard to amenity, safety and convenience.</p>
Core Strategy	KCDP 3-4 <i>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.</i>	<p>The site of the proposed development is located within the development boundary of Killarney Town. While the site is greenfield in nature the development is adjacent to established residential developments.</p> <p>The proposed development of 134no. dwellings represents 10.5% of the residential growth identified in the Core strategy for Killarney Town.</p>

<p>Core Strategy</p>	<p>KCDP 3-9 <i>Ensure the implementation and integration of the findings of the Housing Need Demand Assessment into the Housing Strategy for the county.</i></p>	<p>The Housing Need and Demand Assessment, as in indicated in the Plan outlines the provision of good housing mix in all developments will be encouraged to ensure that residents have access to a range of house types and tenures which match the needs of households.</p> <p>The proposed development provides for 10no. 4-bed units; 87no. 3-bed units; 31no. 2-bed units; and 6no. 1-bed units.</p> <p>In this respect, the mix proposed here is considered consistent with the Housing Strategy, offering a broad range of house types and sizes.</p>
<p>Towns and Villages</p>	<p>KCDP 4-2 <i>Facilitate and support the sustainable development of towns and villages of sufficient scale and quality to be drivers of growth, investment, and prosperity.</i></p>	<p>The net residential density of the proposed development is 40 units per hectare, providing 134no. units across a site of 3.35 hectares net developable area.</p> <p>The development as proposed represents an increased density and residential yield than that identified in the Development Plan. However, the density as proposed has been guided by both National and Local policy in relation to densities.</p> <p>The Sustainable Residential Development and Compact Settlements Guidelines indicate that consideration should be given to the character, amenity and natural environment of an area.</p> <p>It is considered that the site is located adjacent to a number of sensitive receptors, this includes the substantial extant residential dwellings which bound the site as well as the Killarney House Demesne. Having regard to this, a density of 40 units per hectare has been achieved to provide for an increased density than that of the prevailing character of the area, in line with National, Regional and Local planning policies seeking increased densities in line with compact growth targets.</p>

<p>Placemaking</p>	<p><i>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.</i></p>	<p>The proposed development provides for 15% open space across the site. The proposed development provides significant areas of public open spaces which have been carefully integrated into the site layout to allow for safe play areas for use of children which have the benefit of overlooking. These areas provide a social and community space within the development.</p> <p>Further to this, the Landscape Masterplan has been prepared to ensure that all areas of public realm are of high-quality materials which in combination with the design and layout of dwelling units will make for an attractive community.</p> <p>The site layout prioritises safe pedestrian and cyclist connectivity – allowing for permeability throughout the site. The layout additionally creates an attractive, distinct and easily accessible and navigable place.</p> <p>The site layout provides for the creation of distinct residential character areas within the scheme, each of which is linked through the green amenity spaces provided. This seeks to create a new and distinct sense of place as well as to ensure a high quality of place in regard to amenity, safety and convenience.</p>
<p>Urban Design and Built Environment</p>	<p><i>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.</i></p>	<p>A DMURs Compliance Statement has been prepared by OSL Butler Consulting Engineers which concludes that the proposed development is consistent with both the principles and guidance outlined in the Design Manual for Urban Roads and Streets (DMURS) 2019. The proposed site layout therefore promotes and prioritises walking and cycling. While car parking has been provided, it is the objective of this layout to positively encourage users of the area to use the many safe and attractive pedestrian and cycle routes.</p>

Accessibility and Mobility	<p>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.</p>	<p>The proposed development will see the construction of 134no. residential c. 900m from the Town Centre of Killarney. This will provide for 134no. units within walking distance of the town centre.</p> <p>Additionally, the development will provide for a childcare facility with the capacity to accommodate 102no. children – providing further services within the Town boundary and further contributing to the development of a compact 10-minute town.</p>
Accessibility and Mobility	<p>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.</p>	<p>The proposed development will provide for enhanced pedestrian access from the site to Killarney Town Centre by way of the provision of a pedestrian crossing at the Ross Road. This will provide for increased pedestrian permeability and safe access to the town centre for new and existing residents adjacent.</p>
Residential Densities and Building Heights	<p>KCDP 4-40 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).</p>	<p>The net residential density of the proposed development is 40 units per hectare, providing 134no. units across a site of 3.35 hectares net developable area.</p> <p>The Sustainable Residential Development and Compact Settlements Guidelines indicate that consideration should be given to the character, amenity and natural environment of an area.</p> <p>It is considered that the site is located adjacent to a number of sensitive receptors, this includes the substantial extant residential dwellings which bound the site as well as the Killarney House Demesne. Having regard to this, a density of 40 units per hectare has been achieved to provide for an increased density than that of the prevailing character of the area, in line with National, Regional and Local planning policies seeking increased densities in line with compact growth targets.</p>

<p>Sustainable Communities</p>	<p><i>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.</i></p>	<p>The proposed development will provide for 134no. much needed - high quality residential developments which is located adjacent to the town centre, providing residents access to a wide range of community, health, educational facilities, and amenities, suitable to all ages and needs as identified in the Social and Community Audit which accompanies this submission.</p> <p>Additionally, the development will provide for a childcare facility with the capacity to accommodate 102no. children – providing further services within the Town boundary and further contributing to the creation of a sustainable community.</p> <p>The proposed development will provide for the maintenance and creation of a vibrant sustainable communities supporting an enhanced quality of life for all people.</p>
<p>Housing for Sustainable Communities</p>	<p><i>KCDP 6-16 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).</i></p>	<p>The net residential density of the proposed development is 40 units per hectare, providing 134no. units across a site of 3.35 hectares net developable area.</p> <p>The development as proposed represents an increased density and residential yield than that identified in the Development Plan. However, the density as proposed has been guided by both National and Local policy in relation to densities.</p> <p>The Sustainable Residential Development and Compact Settlements Guidelines indicate that consideration should be given to the character, amenity and natural environment of an area.</p> <p>It is considered that the site is located adjacent to a number of sensitive receptors, this includes the substantial extant residential dwellings which bound the site as well as the Killarney House Demesne. Having regard to this, a density of 40 units per hectare has been achieved to provide</p>

		for an increased density than that of the prevailing character of the area, in line with National, Regional and Local planning policies seeking increased densities in line with compact growth targets.
Housing for Sustainable Communities	<i>KCDP 6-17 Promote integration of social housing and ensure a housing mix within developments in order to promote a socially balanced and inclusive society.</i>	<p>The preliminary Part V proposals to satisfy the developer's Part V obligations is to provide 27no. dwelling units to the Planning Authority to satisfy the 20% Part V allocation.</p> <p>This provides for 27no. units across unit sizes and typologies across the wider site. Providing 18.5% 3-beds, 60% 2-beds and 21.5% 1-beds. The location and mix of these units will ensure to create a socially balanced and inclusive community.</p>
Childcare	<i>KCDP 6-52 Facilitate the provision of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, that meet the diverse needs of local populations.</i>	<p>The proposed development includes the provision of crèche with capacity to accommodate 102no. children.</p> <p>The Creche provides for 7no. of classrooms across two floors, accommodating 102no. children ranging wobblers, toddlers and pre-school children. The creche proposed all required accompanying spaces such as a sleep room, changing facilities, toilets and outdoor play areas.</p> <p>The Creche provides for sufficient staff facilities, i.e office space, staff room, changing and toilets.</p> <p>In this regard, the proposed childcare facility represents a high quality, much needed facility which will provide an essential service to the future occupants of the proposed development as well as those living in the wider Killarney Environs.</p>

Housing Policy	<i>KCDP 7-8 Have regard to and promote increased residential densities in the towns and other appropriate locations in accordance with the policies of the NPF, RSES, Housing for All and the 'Sustainable Residential Development in Urban Areas' Guidelines 2009 (DoEHLG).</i>	<p>The net residential density of the proposed development is 40 units per hectare, providing 134no. units across a site of 3.35 hectares net developable area.</p> <p>The development as proposed represents an increased density and residential yield than that identified in the Development Plan. However, the density as proposed has been guided by both National and Local policy in relation to densities.</p>
Housing Policy	<i>KCDP 7-9 Promote integration of social housing and ensure a housing mix within developments in order to promote a socially balanced and inclusive society.</i>	<p>The preliminary Part V proposals to satisfy the developer's Part V obligations is to provide 27no. dwelling units to the Planning Authority to satisfy they 20% Part V allocation.</p> <p>The location and mix of these units will ensure to create a socially balanced and inclusive community.</p>
All-Ireland Pollinator Plan 2021-2025	<i>KCDP 11-20 Support the management of appropriate green areas to become natural biodiversity areas to encourage natural wildflowers to recolonise and support enhanced bee and insect populations.</i>	<p>The Landscape Masterplan provides for a comprehensive landscaping and planting schedule which includes tree planting, shrubs and groundcover and hedgerow planting.</p> <p>These areas have been designed in accordance with the All-Ireland Pollinator Plan to recolonise and support enhanced bee and insect populations.</p>
Lights and Biodiversity	<i>KCDP 11-44 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.</i>	<p>As is outlined in NIS prepared by DixonBrosnan during both construction and operational phases lighting mitigation measures will follow Bats & Lighting Guidance Notes for: Planners, engineers, architects and developers (Bat Conservation Ireland, 2010).</p> <p>As concluded in the NIS, the public lighting scheme as proposed will not result in any likely significant effects on bats or other species.</p>

<p>Land Use and Flood Risk Management</p>	<p><i>KCDP 11-66 Have regard to and implement the recommendations and provisions of the Planning System and Flood Risk Management guidelines (DoEHLG 2009).</i></p>	<p>A Site Specific Flood Risk Assessment has been prepared by IE Consulting.</p> <p>The Flood Risk Assessment concludes that potential flood risk to and from the development as proposed is considered to be low. The development as proposed is not predicted to result in an adverse impact to the existing hydrological regime of the area or increase flood risk elsewhere and is therefore considered to be appropriate from a flood risk perspective.</p>
<p>Storm Water Management</p>	<p><i>KCDP 13-21 Improve sustainable drainage and reduce the risk of flooding in the urban environment in accordance with the CIRIA SuDS Manual 2015</i></p>	<p>As detailed in the documentation prepared by OSL Butler Consulting Engineers surface water from the site will be collected and attenuated on site, with a peak discharge rate of 17,7l/s (QBAR)for the 1 in 100 Year rainfall event (including an allowance of 20% for climate change). As part of the development, a number of different SuDS measures will be provided to minimise the impact on water quality and water quantity of the runoff and maximise the amenity and biodiversity opportunities within the site.</p> <p>Further to this, a Site Specific Flood Risk Assessment has been prepared by IE Consulting</p> <p>The Flood Risk Assessment concludes that potential flood risk to and from the development as proposed is considered to be low. The development as proposed is not predicted to result in an adverse impact to the existing hydrological regime of the area or increase flood risk elsewhere and is therefore considered to be appropriate from a flood risk perspective.</p>

Kerry County Development Plan, 2022 – 2028 - Volume Two – Town Development Plans

Issue	Policy / Objective	Response
Killarney Town Strategic Objectives	KA 5 <i>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.</i>	<p>The site is greenfield and located on the edge of the existing urban area. In this respect it largely creates and defines its own character building on the existing distinctiveness and characteristics of the natural and built environment in the area.</p> <p>The site layout prioritises safe pedestrian and cyclist connectivity – allowing for permeability throughout the site. The layout additionally creates an attractive, distinct and easily accessible and navigable place.</p> <p>The site layout provides for the creation of distinct residential character areas within the scheme, each of which is linked through the green amenity spaces provided. This seeks to create a new and distinct sense of place as well as to ensure a high quality of place in regard to amenity, safety and convenience.</p>
Residential Development Objectives	KA 13 <i>Facilitate the development of 1,277 residential units within the town boundary.</i>	<p>The proposed development of 134no. dwellings represents 10.5% of the residential growth identified in the Core strategy for Killarney Town.</p> <p>The site of the proposed development is located within the development boundary of Killarney Town and is appropriately zoned for the development of residential units.</p>
Residential Development Objectives	KA 15 <i>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.</i>	<p>The proposed development is for the construction of 134 no. residential units which includes a range of unit sizes and 17no. typologies. This provides for a range of unit sizes, including larger units for families in addition to smaller units which are suitable for those wishing to downsize units.</p> <p>It can be concluded that the proposed development offers a range of attractive and diverse unit types to cater to all types of individuals.</p>
Recreation, Amenity and Open Space Objectives	KA 25 <i>Ensure that all plans and projects follow Article 6 of the Habitats Directive and that the ecological integrity of Natura 2000 sites is safeguarded.</i>	<p>A Natura Impact Assessment has been prepared to accompany this planning submission.</p> <p>The NIS has examined and analysed, in light of the best scientific knowledge, with respect to Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC and Killarney National Park SPA within the potential likely zone of impact of the proposed development, the potential effect pathways, how these could impact on qualifying species and</p>

		<p>habitats and whether the predicted effects would adversely affect the integrity of these European sites.</p> <p>It has been objectively concluded following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted effects from the proposed development and with the implementation of the mitigation measures proposed, that the construction and operation of the proposed development will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects.</p>
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Kerry County Development Plan, 2022 – 2028 - Volume Six – Development Management Standards

Issue	Policy / Objective	Response
Zoning	R1 New/Proposed Residential Provide for new residential development in tandem with the provision of the necessary social and physical infrastructure	<p>The proposed development will consist of a largescale residential development (LRD), comprising of 134no. residential dwellings as follows: 65no. houses consisting of 10no. 4-bed dwellings and 55no 3-bed dwellings; 51no. townhouses consisting of 32no. 3-bed units and 19no. 2-bed units; and 18no. apartments consisting of 12no. 2-bed units and 6no. 1-bed units. The proposed development also includes crèche with capacity to accommodate 102no. children.</p> <p>The Plan outlines that residential units are appropriate uses for lands identified for this zoning. Further to this, the development of childcare facilities within new residential developments, subject to other planning criteria, is generally acceptable.</p> <p>In this regard it is considered that the principle of the development is in keeping the objective of the land use zoning objective R1.</p>
Zoning	R2 Existing Residential Provide for residential development and protect and improve residential amenity	<p>The proposed development will consist of a largescale residential development (LRD), comprising of 134no. residential dwellings as follows: 65no. houses consisting of 10no. 4-bed dwellings and 55no 3-bed dwellings; 51no. townhouses consisting of 32no. 3-bed units and 19no. 2-bed units; and 18no. apartments consisting of 12no. 2-bed units and 6no. 1-bed units. The proposed development also includes crèche with capacity to accommodate 102no. children</p> <p>The Plan outlines that residential units are appropriate uses for lands identified for this zoning. Further to this, the development of childcare facilities within new residential developments, subject to other planning criteria, is generally acceptable.</p> <p>In this regard it is considered that the principle of the development is in keeping the objective of the land use zoning objective R2.</p>

3.0 CONCLUSION

- 3.1 This Statement of Consistency has demonstrated the compliance of the proposed development with the various objectives of the Kerry County Development Plan 2022-2028.
- 3.2 It is submitted that the proposed development will provide an appropriate form of high-quality residential development for this residentially zoned site, providing for an efficient use of lands, which will contribute to achieving the aims and objectives for the development of the settlement of Killarney as set out by the Planning Authority.
- 3.3 The design and layout of the proposed development has been prepared following pre-planning consultation with the Planning Authority under Section 247 of the Planning and Development Act, 2000, as amended. In addition, separate informal consultations were undertaken with relevant personnel in the Planning Authority to ensure all relevant matters have been addressed as part of the pre-application process and the design and layout have been amended to respond to the issues raised in those discussions.
- 3.4 In conclusion, it is submitted that the proposed development is consistent with all relevant national, regional and local planning policies and guidelines and therefore in accordance with the proper planning and sustainable development of the area.