



COAKLEY O'NEILL
town planning

Statement of Response to Council Opinion

Largescale Residential Development
Ross Road, Killarney, County Kerry

Prepared in July 2025 on behalf of
Homeland Projects Ltd.

Coakley O'Neill Town Planning Ltd.

 NSC Campus, Mahon, Cork



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1.0 INTRODUCTION

Homeland Projects Ltd., intend to seek permission for the development of a new residential scheme on lands at Ross Road, Killarney, Co Kerry.

The proposal takes the form of a Largescale Residential Development (LRD) comprising of 134no. residential dwellings and a crèche (585sqm) with capacity to accommodate 102no. children.

Following the LRD Opinion meeting on the 7th May 2025, the Planning Authority issued their Opinion on the 16th May 2025, which stated that they were of the opinion that on the basis of the documentation submitted with the consultation request under section 32B of the Planning and Development Act, 2000 (as amended), the proposed development constituted a reasonable basis on which to make an application for planning permission.

During the course of the LRD Opinion meeting held on the 7th May there were a number of issues discussed and which required further consideration to adequately address concerns or to provide supplementary documentation/assessments as sought by Kerry County Council.

Such items were detailed in the minutes of the LRD meeting and the appendices of same which accompanied the LRD Opinion issued on the 16th May 2025.

The following response to the items identified, which should be read in conjunction with the plans and particulars submitted with the planning application, has been prepared by the applicants' design team:

- Coakley O'Neill Town Planning Ltd.
- Dedy Gahan Architects
- OSL Butler Consulting Engineers
- Simon Ronan Landscape Architects
- Dixon Brosnan Ecology
- Irish Archaeological Consultancy Ltd

For clarity, the applicants' response to each of the items raised is set out in the order that they appear in the Planning Authority's meeting minute and appendices of same.

Each item is outlined in italics, followed by the Applicants' response to same.

2.0 RESPONSE TO OPINION ITEMS

LRD Opinion Item 1: Archaeology

Pre-development archaeological testing will need to be carried out on the site under licence and report submitted with the planning application. Archaeological material has been recovered in the vicinity in the recent past.

Response

Archaeological testing was carried out over the course of four days from 1st July 2025 using a mechanical excavator fitted with a flat grading bucket. 26no. trenches targeted geophysical anomalies and open green space to fully investigate the archaeological potential of the site.

Testing revealed four areas of archaeological significance, which have been designated as Archaeological Areas 1–4. These comprise three charcoal production pits and a possible trough.

It is the recommendation and conclusion of the Archaeological Assessment that Archaeological Areas 1–4 be preserved by record (archaeological excavation) in advance of development and this should be undertaken under licence to the National Monuments Service of the Department of Housing, Local Government and Heritage (DoHLGH). It is also recommended that all topsoil stripping associated with the proposed development be monitored by a suitably qualified archaeologist. If any features of archaeological potential are discovered during the course of the works further archaeological mitigation may be required, such as preservation in situ or by record. Any further mitigation will require approval from the National Monuments Service of the DoHLGH.

To address and satisfy these recommendations, appropriate planning conditions can be imposed on any planning permission granted and the applicants are happy to comply with same. For further detail please refer to the Archaeological Assessment prepared by Irish Archaeological Consultancy Ltd. which accompanies this application.

LRD Opinion Item 2: Ecology

- a) *Draft Appropriate Assessment (AA Screening, Natura Impact Statement (NIS) and Ecological Impact Assessment (EclA) Reports noted and welcomed.*
- b) *AA Screening and NIS Reports - potential for operational stage impacts of wastewater on Slender Naiad should be expanded upon.*
- c) *Report on public lighting should confirm that proposals are in accordance with the recommended lighting mitigation measures.*

Further comments:

- *The lands are zoned for residential development in the Kerry CDP 2022-2028. The making of that plan was supported by AA, SEA and SFRA.*
- *It is noted and welcomed that AA Screening, NIS and EclA reports have been prepared.*
- *It is noted and welcomed that the overall design has been informed by tree and ecological surveys undertaken, and that nature-based solutions to storm water management have been incorporated (tree pits etc).*

- *Connection to municipal drainage infrastructure to be in accordance with Irish Water requirements.*
- *Lighting mitigation measures to be clear and unambiguous. The lighting report should confirm that the proposals are in accordance with the mitigation measures outlined.*
- *AA Screening/ NIS - potential for operational stage impacts on wastewater, Najas flexilis (Slender Naiad), to be expanded upon.*
- *Section 12.4.4 of the EclA / landscaping proposals to be amended to more clearly refer to /incorporate recommendations of the All-Ireland Pollinator plan.*
- *AA related mitigation measures should have the clarity and specificity recommended in S3.2.4 of the 2021 EC guidance document referred to below. Inclusion of a table similar to Table 7 outlined on page 39 of the guidance document would be helpful and should be considered.*
- *In combination effects to take into account permitted LRDs elsewhere in Killarney.*
- *Documents to be proof read for typos (e.g. NIS 6.2.1 and 12.1 of the EclA where some mm's are repeated within the sections, 6.5 reference to N72, NIS Page 38 refers to buildings rather than trees).*
- *Where / if (wildlife) derogation licenses are required, these should be submitted as part of the planning application.*

Response

As outlined in Engineering services Report (OSL-Butler 2025):

- The proposed development will be served by a new water supply network. The water supply network to serve the development will be constructed in accordance with Uisce Éireann Code of Practice and Standard Details for water infrastructure.
- The proposed development will be served by new foul infrastructure. The foul network to serve the development will be constructed in accordance with Uisce Éireann Code of Practice and Standard Details for wastewater infrastructure.
- The surface water management regime will be based on SuDS principles.
- 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.

Details of surface water and foul water layouts are included in Appendix 2 of the AA/NIS report and summarised in Section 3.3 and Section 3.4 of the report.

An updated Lighting impact assessment (Molloy Consulting Engineers) provides detailed operational design measures which are in line with best practices published by BAT Conservation Ireland, and ILP Guidance Note 8: Bats and Artificial Lighting. These mitigation measures have been included in the EclA and AA/NIS reports.

In respect of Najas flexilis (Slender Naiad) the NIS states:

5.2.8.....As noted in Section 4.9.4, the addition of the effluent discharge from the proposed housing development to the Killarney WWTP is well within its design capacity and will not comprise the operational capability of the WWTP to treat effluent to comply with emission limit values. The discharge from the wastewater treatment plant does not have an observable negative impact on the Water Framework Directive status.

4.9.4.....No likely significant effects on water quality within Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC have been identified from the proposed wastewater discharges.

The SRLA landscape masterplan has been updated to clearly refer to the All-Ireland Pollinator Plan 2022-2025.

A table of mitigation measures, following s3.2.4 of the 2021 EC Guidance Document has been included in Appendix 3 of the AA/NIS report. This clearly outlines the mitigation measures which will prevent adverse effects on qualifying species and/or habitats for the relevant Natura 2000 sites.

No derogation licences are required as part of the planning application. No roosting bats were recorded within any of the structures (or trees) present at the site. No Badger setts, Otter holts etc were recorded which could potentially require a derogation licence.

LRD Opinion Item 3: Part V Provision

- a) *Developer must comply with Part V of the Planning and Development Act, 2000 (as amended) in relation to the provision of Social and Affordable Housing.*
- b) *Draft layout of the development identifies 27 no. housing units to be delivered for Social Housing, and the units are well dispersed.*
- c) *It is noted that over 80% of the identified units comprise 1-bed and 2-bed units. This is welcomed.*
- d) *Specifications and costs for the Social Housing Units must be addressed prior to commencement of development*

Response

The proposed development comprises the development of 134no. residential units which are subject to Part V compliance under this planning application. The applicant proposes to provide 27no. dwelling units to the Planning Authority to satisfy the 20% Part V allocation.

The proposal provides for 27no. dwellings of different unit sizes and typologies across the wider site. Broken down, it provides for 18.5% 3-bed units, 60% 2-bed units and 21.5% 1-bed units.

Plans, sections and elevations of these units have been prepared by Deady Gahan Architects and accompany this submission. The location of these units are illustrated on Drawing No. 24096/P/007 – Proposed Part V Allocation, prepared Deady Gahan Architects.

A Part V Proposal, including indicative costings, has been prepared by Coakley O'Neill Town Planning and accompanies this planning application.

This fully meets with the requirements of Article 22(2)(e) of the Planning and Development Regulations, 2001, as amended.

As is normal practice, specifications and final costs for all Part V units can be conditioned to be confirmed and agreed with the Planning Authority prior to the commencement of development.

LRD Opinion Item 4: Fire safety

- a) *Access to Unit 1 needs to be clarified.*
- b) *Proposed apartments and childcare building will require Fire Certs*
- c) *Concerns raised in relation to proposed service road widths and turning circle designs may not be adequate to cater for emergency vehicles.*
- d) *Diameter of proposed watermains and layout of fire hydrants should be reviewed.*
- e) *Guidelines in relation to Electric Vehicle Charging must be complied with.*
- f) *See Appendix C for report received from the Fire Dept*

Further Comments:

1. *It is noted that at the north eastern corner of the site (i.e., to the north of the location of the Creche facility) where there is a T-Turning facility provided that it appears that the dead-end is longer than 20m but that southern part of the T-turning facility may not be sufficiently long to enable a Fire Appliance to turn there in accordance with the requirements of Section 5 and Table 25 and paragraph 5.4.4.1 of Building Regulations Technical Guidance Document B 2024 Fire Safety - Volume 1 Buildings other than Dwelling Houses. [Reference extract: "Where access roadways are provided within the site of a building, turning facilities for appliances, in accordance with the requirements of Table 25, should be provided in any dead-end access route that is more than 20 m long," Note: Further guidance on the provision of turning facilities is provided in Section 2,6 of the Recommendations for Site Development Works for Housing Areas.]*
2. *It is noted that at the north western corner of the site (i.e., to the north of the location of unit 19) that it appears that the dead-end is longer than 20m but that an appropriate turning facility does not appear to have been provided there so as to enable a Fire Appliance to turn there in accordance with the requirements of Section 5 and Table 25 and paragraph 5.4.4.1 of Building Regulations Technical Guidance Document B 2024 Fire Safety - Volume 1 Buildings other than Dwelling Houses. [Reference extract: "Where access roadways are provided within the site of a building, turning facilities for appliances, in accordance with the requirements of Table 25, should be provided in any dead-end access route that is more than 20 m long." Note: Further guidance on the provision of turning facilities is provided in Section 2.6 of the Recommendations for Site Development Works for Housing Areas.]*
3. *For purposes of clarification of adequacy, the turning radii of all corners and junctions should be appropriately reviewed and updated so as to demonstrate adequate radius dimension to enable the cornering and movement of vehicles in accordance with requirements of Section 5 and Table 25 and paragraph 5.4.4.1 of Building Regulations Technical Guidance Document B 2024 Fire Safety - Volume 1 Buildings other than Dwelling Houses. [Reference extract: "Where access roadways are provided within the site of a building, turning facilities for appliances, in accordance with the requirements of Table 25, should be provided in any dead-end access route that is more than 20 m long." Note: Further guidance on the provision of turning*

facilities is provided in Section 2.6 of the Recommendations for Site Development Works for Housing Areas.]

4. On Drawing No. 24041-OSL~ll-DR-C-1110 Rev. P02, i.e, Proposed Roads Layout drawings, it appears than an orange colour is used which is indicated on the legend to be "PROPOSED SHARED FOOTPATH/ CYCLE PATH" which does not appear to make clear that these areas will also be suitable for the carriage of vehicles including Fire Appliances. e.g., the oval roundabout nearby to Units 99 and 125, the locations in front of most of the houses on the north eastern section of the site, etc. Should these areas be reclassified as roads in the normal way and that they should meet the requirements of Section 5 and Table 25 and paragraph 5.4.4.1 of Building Regulations Technical Guidance Document B 2024 Fire Safety - Volume 1 Buildings other than Dwelling Houses.

Response

The Planning Authority should refer to the Site Layout Drawing submitted as part of this planning application for access arrangements for unit 1. Permission is being sought for a vehicular connection to the adjacent vehicular access serving the existing dwelling Blossom Gate so as to access Unit Type G. This design rationale has been sought to maintain the existing character and unit typology along the Ross Road.

It is acknowledged that the apartments and childcare buildings will require Fire Certs. These will be applied for in due course.

The proposed road designs (including but not limited to road widths, kerb radii and turning areas) are in accordance with all relevant guidance documents and codes of practice, including the Design Manual for Urban Roads and Streets (DMURS). The DMURS provides clear guidance regarding the accommodation of larger vehicles (such as refuse trucks or fire tenders) on roads where their presence is infrequent. The key points include:

1. Reduced Road Widths and Kerb Radii - For streets not regularly used by large vehicles, road widths and kerb radii may be reduced. This encourages slower speeds and improves pedestrian safety and comfort, supporting the overall goal of creating more people-friendly urban environments.
2. Swept Path Flexibility - Where larger vehicles are not expected to use a road regularly, it is acceptable under DMURS for them to encroach slightly into the opposite lane or overrun pedestrian areas (e.g., mountable kerbs or reinforced verges) when turning or manoeuvring, as long as it does not present a significant safety risk.
3. Design Approach - DMURS promotes a context-sensitive and balanced approach to street design. Rather than over-designing for infrequent vehicle movements, the manual encourages designers to prioritize the needs of pedestrians and cyclists, especially in residential or low-speed environments.
4. Turn Movements and Lane Crossings - The manual explicitly states that in low-traffic or residential areas, some minor encroachment into the oncoming lane for large vehicle turning movements is permissible, provided that this occurs at low speeds and in predictable locations (e.g., junctions) and does not compromise overall safety.

The Planning Authority should refer to the DMURS Compliance Statement, 24041-OSL-00-RP-C-0004, as well as Section 3 of the Engineering Services Report, 24041-OSL-00-RP-C-001, confirming and reaffirming the above with references to the relevant clauses within DMURS.

The turning movements of large vehicles within the estate, including using the turning areas provided, has been demonstrated on the 'Proposed Vehicular Visibility and Manoeuvring Sheets', 24041-OSL-11-DR-C-1113 and 1114. The roadways to which the emergency vehicles would have access are part of the estate roads and not considered as being within the building site.

The Planning Authority should also refer to the Road Safety Audit, Stage 1, included as part of this planning submission under separate cover. The proposal is considered acceptable and in accordance with the relevant guidelines and codes of practice.

Please refer to the Proposed Road Layout Plan, 24041-OSL-11-DR-C-1110, where surface finishes and intended uses are clearly defined in the legend through colour-coded delineation.

LRD Opinion Item 5: Engineering

- a) *Proposed outlet for surface water from the proposed development must be confirmed on the ground.*
- b) *Concerns raised in relation to layout of service road, car parking and set-down serving the proposed childcare facility.*
- c) *Applicant recommended to liaise with David Doyle, Senior Engineer dealing with Active Travel in relation to the design of the junction of the service road with Ross Road.*

Response

Please refer to Section 7 of the Engineering Services Report, 24041-OSL-00-RP-C-001, confirming that further investigations and surveys, agreed with Mr. Stephen Sheehan (Executive Engineer Kerry County Council), confirmed the existence and location of the existing surface water sewer within Ross Road.

Please refer to the Proposed Road Layout Plan, 24041-OSL-11-DR-C-1110, illustrating the improvements made to the layout in relation to the service road, car parking and set-down serving the childcare facility. Please also refer to the Road Safety Audit, Stage 1, included as part of this planning submission under a separate cover. The proposal is considered acceptable and in accordance with the relevant guidelines and codes of practice.

Please refer to Section 3 of the Engineering Services Report, 24041-OSL-00-RP-C-001, confirming discussions and agreement with Kerry County Council regarding the Active Travel Provision along Ross Road.

OSL Butler has liaised with David Doyle, Senior Engineer, and Pdraig O'Donoghue, Executive Engineer, of Kerry County Council dealing with Active Travel, in relation to the design of the junction of the service road with Ross Road. Kerry County Council requested that the applicant assess and demonstrate the possible implementation of an Active Travel Facility along Ross Road. The findings and recommendations of the aforementioned assessment was reviewed by and agreed with Kerry County Council.

The new development junction and associated features, which includes the Active Travel Facility as agreed with Kerry County Council, is to be provided by the developer (within the site red line boundary as presented) as part of

this development and is shown on the Proposed Roads Layout, 24041-OSL-11-DR-C-1110, and Proposed Road marking and Signage Layout, 24041-OSL-11-DR-C-1117.

The Proposed Future Active Travel Provision along Ross Road, as reviewed by and agreed with Kerry County Council and to be delivered by Kerry County Council (outside the site red line boundary as presented), has been shown on the Proposed Future Active Travel Provision layout, 24041-OSL-11-DR-C-1117.

LRD Opinion Item 6: Site Development Works for Housing Areas

- a) *Site Development Works should be in accordance with 'Site Development Works for Housing Areas'.*
- b) *House Unit No 1 has proposed vehicular access from Ross Road. If access is not from the proposed service road, consideration should be given to omitting this unit from the proposed development.*
- c) *Concerns raised in relation to the width of the service road and tight radii at some junctions.*
- d) *Landscaping works must not impede sightlines at junctions within the development.*
- e) *Priority at all internal junctions must be made clear.*
- f) *Design of stormwater detention basins should have regard to drowning risk.*
- g) *Concerns raised regarding road and parking layout in vicinity of childcare facility and to possible inadequate stormwater drainage.*
- h) *Public lighting layout in the vicinity of Castle Falls Development should be reviewed.*
- i) *Taking in Charge Map should be submitted with the planning application.*

Response

Please refer to LRD Opinion Item 3 response above in relation to LRD Opinion Items 5 a to c.

We hereby confirm that landscaping proposals have been coordinated in order to ensure that sightlines and visibility at junctions are not impeded.

Please refer to the Proposed Road marking and Signage Layout, 24041-OSL-11-DR-C-1117, for clear identification of priority at all internal junctions.

Please refer to Section 7 of the Engineering Services Report, 24041-OSL-00-RP-C-001. In response to the local authority's concerns regarding the risk of drowning associated with detention basins, we confirm that the design has been undertaken with due regard to safety and risk mitigation, in accordance with the principles and best practices set out in the CIRIA SuDS Manual (C753). The design incorporates features that align with the guidance outlined in Section 36.5 of the manual, which emphasizes the importance of shallow side slopes (not steeper than 1 in 3), appropriate landscaping, controlled access where necessary, and clear visibility to deter unsafe behaviour. These measures ensure the detention basins are safe for all users while still fulfilling their function in surface water management.

Please refer to LRD Opinion Item 4 response above in relation to LRD Opinion Items 5 g. Please refer to the Proposed Surface Water Layout, 24041-OSL-11-DR-C-1120, for surface water proposals at the childcare facility access road and parking area.

Please refer to the Public Lighting Report included as part of this planning submission under separate cover. Please refer to the Proposed Taking in Charge Layout, 24041-OSL-10-DR-C-1003, included as part of this planning submission.

LRD Opinion item 7: Flooding

The application has provided the required site-specific flood risk assessment by OSL Butler Consulting Engineers, and it is in order from a fluvial flood risk assessment.

- The primary risk of flooding to the site is associated with pluvial flooding and failure of the proposed drainage and SuDS systems within the site. In this regard it is critical that the proposed surface water drainage systems are designed, built and maintained correctly, especially if it's going to be taken in charge by KCC. Poor operational management and maintenance of this system over its design life will significantly compromise the viability and capacity of the system. Estates should, review the proposal and ensure it meets their standards.*
- The applicant is proposing to reduce increased surface water to greenfield runoff conditions and provide treatment in accordance with standard practice. The proposed drainage system is outlined in the Drainage Impact Assessment Report by OSL and associated documents and drawings. The proposal would appear acceptable, subject to final confirmation that the design conforms with current industry standards at planning submission stage.*
- The maintenance regime for the storm drainage infrastructure and SuDS is indicative only and a fully developed operation and management plans needs to be provided and agreed with the Council prior to commencement of construction. This plan must address the immediate and long term requirements of operating and maintaining the proposed drainage systems including site specific inspection regimes for each element, details on their lifetime expectancy, replacement requirements, landscape management, waste management associated with contaminated silt and other materials, whole life costs of O&M etc.*
- The outline Construction Environmental Management Plan (OCEMP) needs to be developed further at Construction Stage to ensure that the Contractor(s) will implement a Site Construction Management System that ensures the surface water drainage and SuDS systems are built in line with the applicable industry standards.*
- It is proposed to service the proposed development by means of a connection to the existing 300mm diameter surface water pipe to the north. The applicant is required to get confirmation that the existing public storm sewer has sufficient capacity.*
- The applicant shall submit a report certifying the quality of the completed works to the Planning Authority with associated as built records. The report shall be prepared by a competent third-party consulting engineer with evidence of professional indemnity insurance.*

Response

Please refer to LRD Opinion Item 3 response above in relation to the item pertaining to the existing surface water sewer in Ross Road.

The comments made as part of the LRD Opinion Item 6 in relation to flooding are acknowledged and noted.

APPENDIX 1: COPY OF KERRY COUNTY COUNCIL LRD OPINION AND MEETING MINUTES



Rory Hanrahan
Coakley O'Neill Town Planning Ltd.
NSC Campus
Mahon
Cork
T12 H7AA

Re: Large Scale Residential Development Opinion

Dear Mr. Hanrahan,

I wish to refer to the above and to the pre-planning meeting held on the 7th May 2025.

Having regard to:

- (a) The Regional Spatial and Economic Strategy for the Southern Region 2020,
- (b) The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024),
- (c) The policies and objectives of the Kerry County Development Plan 2022-2028 and the Development Management Standards contained therein,
- (d) The location of the site within the development boundary of Killarney,
- (e) The 'R1 - New/Proposed Residential' and 'R2 – Existing Residential' Zoning of the land,
- (f) The feasibility of connection of the development to public water supply and public foul sewerage networks,
- (g) The 134 residential units proposed,
- (h) The draft layout of the proposed development,
- (i) The density and housing mix proposed,
- (j) The draft Natura Impact Statement prepared in relation to the proposed development
- (k) The location of the majority of the site in Flood Zone C,

the Planning Authority recommends the draft proposed development constitutes a reasonable basis on which to make an application for planning permission. The applicant should have regard to the advice and recommendations of Kerry County Council's Technical Units, details of which are set out in the attached record of the meeting.

The Planning Department would be happy to facilitate further pre-planning consultation under Section 247 prior to submission of the planning application.

Regards,


A/O Planning



Planning & Development (Amendment) (Large-Scale Residential Development) Act, 2021

Large Residential Development (LRD) Meeting

Held on Wednesday 7th May 2025 at 11.30am
Conference Room, Kerry County Council

Reference Number: PP24/400
Applicant Name: Homeland Projects Ltd.
Site Location: Ross Road, Killarney, County Kerry

In attendance:

Neil Collins	Homeland Projects Ltd
Dave Coakley	Coakley O'Neill Planning
Rory Hanrahan	Coakley O'Neill Planning
Eamonn Gahan	Deady Gahan Architects
Mark Phelan	Deady Gahan Architects
Ben Mong	OSL Butler
David Butler	OSL Butler

Kerry County Council:

Michael Lynch	Senior Executive Engineer, Planning
Anna-Meria Costelloe	Executive Planner, Housing (Capital Delivery)
Fiona O'Sullivan	Executive Planner, Planning
Michael Connolly	County Archaeologist
Dónal Murphy	Senior Executive Engineer, Housing Estates
Eoin Kelleher	Executive Planner/Ecologist
Conal Murphy	Executive Engineer, Environment
Stephen Sheehan	Killarney Municipal District, Executive Engineer
Noel Cronin	Asst. Chief Fire Officer, Fire Service
Mary Mc Carthy	Assistant Staff Officer, Planning

Introduction

Michael Lynch, Senior Executive Engineer with KCC Planning Dept:

Welcomed everyone to the meeting and gave a background to the process prescribed by the Planning and Development (Amendment) (Large- Scale Residential Development) Act, 2021 for proposed residential developments comprising 100 units or more.

In this case, a pre-planning meeting was held on 18th December 2024, under Section 247 of the Planning and Development Act, 2000 (as amended), on TEAMS in relation to a proposed residential development at Ross Road, Killarney.

A formal request for an LRD Meeting under Section 32(b) was received by Kerry County Council on 10/04/2025 from Coakley O'Neill on behalf of Homeland Projects Ltd in relation to a residential development of 134 units on their lands at Ross Road, Killarney. Then, within 4 weeks of today's LRD Meeting, KCC will issue its LRD Opinion to the applicant as to whether the proposal constitutes a reasonable basis on which to make an application for planning permission under Section 32(d).

The planning application must be made within 6 months of the issuing of the LRD Opinion.

KCC would be happy to engage in further pre-planning consultation under Section 247 prior to submission of the planning application.

Applicant's Presentation

Coakley O'Neill Planning Consultants gave a Powerpoint Presentation describing the site and outlining the draft layout of the proposed residential development.

See Appendix A attached to this report for the presentation details.

The draft proposed residential development comprises the following:

- a) The construction of 134no. residential dwellings as follows: 69no. houses consisting of 10no. 4-bed dwellings and 59no 3-bed dwellings; 47no. townhouses consisting of 30no. 3-bed units and 17no. 2-bed units; and 18no. apartments consisting of 12no. 2-bed units and 6no. 1-bed units;
- b) A crèche (585sqm) with capacity to accommodate 102no. children;
- c) The demolition of existing agricultural sheds;
- d) Car parking, including EV charging points and bicycle parking;
- e) Private, communal, and public open spaces;
- f) Internal roads and pathways;
- g) Pedestrian and cyclist routes;
- h) Hard and soft landscaping and boundary treatments;
- i) Waste storage;
- j) Plant;
- k) Signage;
- l) A new vehicular and pedestrian access with raised table and pedestrian crossing onto the Ross Road;
- m) Public lighting;
- n) 2no. substations;
- o) All associated site development works; and
- p) All drainage and foul sewer infrastructure and network works including connections to the existing networks and nature-based SuDS measures.

Kerry County Council response to Coakley O'Neill presentation

Dr Michael Connolly, County Archaeologist

Pre-development archaeological testing will need to be carried out on the site under licence and report submitted with the planning application. Archaeological material has been recovered in the vicinity in the recent past.

Eoin Kelleher, Ecologist, Environmental Assessment Unit

- (a) Draft Appropriate Assessment (AA) Screening, Natura Impact Statement (NIS) and Ecological Impact Assessment (EclA) Reports noted and welcomed.
- (b) AA Screening and NIS Reports – potential for operational stage impacts of wastewater on Slender Naiad should be expanded upon.
- (c) Report on public lighting should confirm that proposals are in accordance with the recommended lighting mitigation measures.

See Appendix B for full report prepared by Eoin Kelleher

Anna Meria Costello, Executive Planner, Housing Capital

- (a) Developer must comply with Part V of the Planning and Development Act, 2000 (as amended) in relation to the provision of Social and Affordable Housing.
- (b) Draft layout of the development identifies 27 no. housing units to be delivered for Social Housing and the units are well dispersed.
- (c) It is noted that over 80% of the identified units comprise 1-bed and 2-bed units. This is welcomed.
- (d) Specifications and costs for the Social Housing Units must be addressed prior to commencement of development

Noel Cronin, Assistant Chief Fire Officer

- (a) Access to Unit 1 needs to be clarified.
- (b) Proposed apartments and childcare building will require Fire Certs
- (c) Concerns raised in relation to proposed service road widths and turning circle designs may not be adequate to cater for emergency vehicles.
- (d) Diameter of proposed watermains and layout of fire hydrants should be reviewed.
- (e) Guidelines in relation to Electric Vehicle Charging must be complied with.
- (f) See Appendix C for report received from the Fire Dept.

Stephen Sheehan, Executive Engineer, Killarney Municipal District

- (a) Proposed outlet for surface water from the proposed development must be confirmed on the ground.
- (b) Concerns raised in relation to layout of service road, car parking and set-down serving the proposed childcare facility.
- (c) Applicant recommended to liaise with David Doyle, Senior Engineer dealing with Active Travel in relation to the design of the junction of the service road with Ross Road.

Donal Murphy, Senior Executive Engineer, Housing Estates Unit

- (a) Site Development Works should be in accordance with 'Site Development Works for Housing Areas'.
- (b) House Unit No 1 has proposed vehicular access from Ross Road. If access is not from the proposed service road, consideration should be given to omitting this unit from the proposed development.
- (c) Concerns raised in relation to the width of the service road and tight radii at some junctions.
- (d) Landscaping works must not impede sightlines at junctions within the development.
- (e) Priority at all internal junctions must be made clear.
- (f) Design of stormwater detention basins should have regard to drowning risk.
- (g) Concerns raised regarding road and parking layout in vicinity of childcare facility and to possible inadequate stormwater drainage.
- (h) Public lighting layout in the vicinity of Castle Falls Development should be reviewed.
- (i) Taking in Charge Map should be submitted with the planning application.

Eoghan O' Brien, Senior Executive Engineer, Flooding, Coastal and Marine Unit

- (a) Eoghan O' Brien was not available to attend the meeting. See Appendix D for report containing comments of the Flooding, Coastal and Marine Unit.

Michael Lynch, SEE Planning, thanked all present for attending the meeting. Kerry County Council will issue LRD Opinion to the applicant by 4th June.

Appendix A

Ppt presentation: [Ross Road 32B Presentation 1.pptx](#)

Appendix B

Written comments of Eoin Kelleher, Ecologist

LRD Ross Road, Killarney – ecology related comments from the Environmental Assessment Unit. May 2025

- The lands are zoned for residential development in the Kerry CDP 2022-2028. The making of that plan was supported by AA, SEA and SFRA.
- It is noted and welcomed that AA Screening, NIS and EclA reports have been prepared.
- It is noted and welcomed that the overall design has been informed by tree and ecological surveys undertaken, and that nature-based solutions to storm water management have been incorporated (tree pits etc).
- Connection to municipal drainage infrastructure to be in accordance with Irish Water requirements.
- Lighting mitigation measures to be clear and unambiguous. The lighting report should confirm that the proposals are in accordance with the mitigation measures outlined.
- AA Screening / NIS - potential for operational stage impacts on wastewater, *Najas flexilis* (Slender Naiad), to be expanded upon.
- Section 12.4.4 of the EclA / landscaping proposals to be amended to more clearly refer to / incorporate recommendations of the All-Ireland Pollinator plan.
- AA related mitigation measures should have the clarity and specificity recommended in S3.2.4 of the 2021 EC guidance document referred to below. Inclusion of a table similar to Table 7 outlined on page 39 of the guidance document would be helpful and should be considered.
- In combination effects to take into account permitted LRDs elsewhere in Killarney.
- Documents to be proof read for typos (e.g NIS 6.2.1 and 12.1 of the EclA where some mm's are repeated within the sections, 6.5 reference to N72, NIS Page 38 refers to buildings rather than trees).
- Where / if (wildlife) derogation licenses are required, these should be submitted as part of the planning application.

The following documents should be taken into consideration, as appropriate

- NPWS 2017 Conservation objectives supporting document for the Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC (*Najas flexilis* (Willd.) Rostk. & W.L.E. Schmidt Version 1. [NPWS](#))
- NPWS 2021 wildlife manual 132 - A study of lakes with Slender Naiad (*Najas flexilis*) [IWM132.pdf](#) (npws.ie)
- EC Commission Notice [2021/C 437/01](#) 'Assessment of plans and projects in relation to Natura 2000 sites – Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC'.

Appendix C

Written comments of the Fire Service

Re: Ross Road, Killarney - LRD pre-planning meeting request

Review notes with regard to Fire Safety and related matters associated to a request for a Large Residential Development (LRD) pre-planning meeting for 134 residential units and a childcare facility at Ross Road, Killarney, County Kerry.

1. It is noted that at the north eastern corner of the site (i.e., to the north of the location of the Creche facility) where there is a T-Turning facility provided that it appears that the dead-end is longer than 20m but that southern part of the T-turning facility may not be sufficiently long to enable a Fire Appliance to turn there in accordance with the requirements of Section 5 and Table 25 and paragraph 5.4.4.1 of Building Regulations Technical Guidance Document B 2024 Fire Safety - Volume 1 Buildings other than Dwelling Houses. [Reference extract:

"Where access roadways are provided within the site of a building, turning facilities for appliances, in accordance with the requirements of Table 25, should be provided in any dead-end access route that is more than 20 m long," Note: Further guidance on the provision of turning facilities is provided in Section 2,6 of the Recommendations for Site Development Works for Housing Areas.]

2. It is noted that at the north western corner of the site (i.e., to the north of the location of unit 19) that it appears that the dead-end is longer than 20m but that an appropriate turning facility does not appear to have been provided there so as to enable a Fire Appliance to turn there in accordance with the requirements of Section 5 and Table 25 and paragraph 5.4.4.1 of Building Regulations Technical Guidance Document B 2024 Fire Safety - Volume 1 Buildings other than Dwelling Houses.

[Reference extract:

"Where access roadways are provided within the site of a building, turning facilities for appliances, in accordance with the requirements of Table 25, should be provided in any dead-end access route that is more than 20 m long." Note: Further guidance on the provision of turning facilities is provided in Section 2.6 of the Recommendations for Site Development Works for Housing Areas.]

3. For purposes of clarification of adequacy, the turning radii of all corners and junctions should be appropriately reviewed and updated so as to demonstrate adequate radius dimension to enable the cornering and movement of vehicles in accordance with requirements of Section 5 and Table 25 and paragraph 5.4.4.1 of Building Regulations Technical Guidance Document B 2024 Fire Safety - Volume 1 Buildings other than Dwelling Houses.

[Reference extract:

"Where access roadways are provided within the site of a building, turning facilities for appliances, in accordance with the requirements of Table 25, should be provided in any dead-end access route that is more than 20 m long." Note: Further guidance on the provision of turning facilities is provided in Section 2.6 of the Recommendations for Site Development Works for Housing Areas.]

4A. On Drawing No. 24041-OSL~11-DR-C-1110 Rev. P02, i.e, Proposed Roads Layout drawings, it appears that an orange colour is used which is indicated on the legend to be "PROPOSED SHARED FOOTPATH / CYCLE PATH" which does not appear to make clear that these areas will also be suitable for the carriage of vehicles including Fire Appliances.

e.g., the oval roundabout nearby to Units 99 and 125, the locations in front of most of the houses on the north eastern section of the site, etc.

Should these areas be reclassified as roads in the normal way and that they should meet the requirements of Section 5 and Table 25 and paragraph 5.4.4.1 of Building Regulations Technical Guidance Document B 2024 Fire Safety - Volume 1 Buildings other than Dwelling Houses.

[Reference extract:

"Where private roads / site roads which include any manhole or other covers are provided, they should meet the provisions set out in Table 25, and the following paragraphs."

Note: Further guidance on the provision of turning facilities is provided in Section 2.6 of the Recommendations for Site Development Works for Housing Areas.]

4B. Please note that other drawings may also be similarly affected by such matters.

5. On Drawing No. 24041-OSL-11-DR-C-1112 Rev. P02, it appears that in various locations based on the vehicles used as have been presented on the drawings that there will be instances where vehicles may need to mount kerbs (e.g. in front of Unit 89, also Unit 44, etc.) or footpaths when progressing through the site and where parking of vehicles (near Unit 74, etc.) may also be difficult due to limitations of dimensions of roadways and arrangements.

6. In the interest of Fire Safety, it appears that certain works within the development will require that Fire Safety Certificates and Disability Access Certificates applications for such works as Apartment Blocks (Triplex), Creche, etc. be made to the Building Control Authority.

[Reference to Articles 11, 20D, etc. of the Building Control Regulations 1997, as amended.]

Appendix D

Written comments of Eoghan O'Brien, Senior Executive Engineer, Flooding, Coastal & Marine Unit

- The application has provided the required site-specific flood risk assessment by OSL Butler Consulting Engineers, and it is in order from a fluvial flood risk assessment.

The primary risk of flooding to the site is associated with pluvial flooding and failure of the proposed drainage and SuDS systems within the site. In this regard it is critical that the proposed surface water drainage systems are designed, built and maintained correctly, especially if it's going to be taken in charge by KCC. Poor operational management and maintenance of this system over its design life will significantly compromise the viability and capacity of the system. Estates should, review the proposal and ensure it meets their standards.

- The applicant is proposing to reduce increased surface water to greenfield runoff conditions and provide treatment in accordance with standard practice. The proposed drainage system is outlined in the Drainage Impact Assessment Report by OSL and associated documents and drawings. The proposal would appear acceptable, subject to final confirmation that the design conforms with current industry standards at planning submission stage.
- The maintenance regime for the storm drainage infrastructure and SuDS is indicative only and a fully developed operation and management plans needs to be provided and agreed with the Council prior to commencement of construction. This plan must address the immediate and long-term requirements of operating and maintaining the proposed drainage systems including site specific inspection regimes for each element, details on their lifetime expectancy, replacement requirements, landscape management, waste management associated with contaminated silt and other materials, whole life costs of O&M etc
- The outline Construction Environmental Management Plan (CEMP) needs to be developed further at Construction Stage to ensure that the Contractor(s) will implement a Site Construction Management System that ensures the surface water drainage and SuDS systems are built in line with the applicable industry standards. T
- It is proposed to service the proposed development by means of a connection to the existing 300mm diameter surface water pipe to the north. The applicant is required to get confirmation that the existing public storm sewer has sufficient capacity.
- The applicant shall submit a report certifying the quality of the completed works to the Planning Authority with associated as built records. The report shall be prepared by a competent third-party consulting engineer with evidence of professional indemnity insurance.