S.37

File With

SECTION 131 FORM

Appeal No

ABP— 323171-25

Defer Re O/H

Having considered the contents of the submission dated/received 20/08/25

from Eugene McMahon + Anne McMahon I recommend that section 131 of the Planning and Development Act, 2000 be/not be invoked at this stage for the following reason(s):

No new issues

Section 131 not to be invoked at this stage. ✓

Section 131 to be invoked — allow 2/4 weeks for reply.

Signed

EO

Date 10/7/25

Signed

SEO/SAO

Date

M

Please prepare BP — Section 131 notice enclosing a copy of the attached submission.

To

Task No

Allow 2/3/4 weeks

BP

Signed

EO

Date

Signed

AA

Date

Lisa / Lita:
LDG-082225-25

An Coimisiún Pleanála

Planning Appeal Online Observation

Online Reference
NPA-OBS-004963

Online Observation Details

Contact Name	Lodgement Date	Case Number / Description
Eugene McMahon	20/08/2025 21:20:05	323171

Payment Details

Payment Method	Cardholder Name	Payment Amount
Online Payment	Anne McMahon	€50.00

Processing Section

S.131 Consideration Required

☑ Yes — See attached 131 Form ☐ N/A — Invalid

Signed [signature] **Date** 28/08/25

EO

Fee Refund Requisition

Please Arrange a Refund of Fee of €

Lodgement No LDG—

Reason for Refund

Documents Returned to Observer ☐ Yes ☐ No

Request Emailed to Senior Executive Officer for Approval ☐ Yes ☐ No

Signed

EO

Date

Finance Section

Payment Reference ch_3RylULB1CW0EN5FC0Lz0WQ37

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount €

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date

Validation Checklist

An Coimisiún Pleanála

Lodgement Number : **LDG-082225-25**
Case Number: **ACP-323171-25**
Customer: **Eugene and Anne McMahon**
Lodgement Date: **20/08/2025 21:30:00**
Validation Officer: **Dáire Littleton Caden**
PA Name: **Kerry County Council**
PA Reg Ref: **2460322**
Case Type: **Normal Planning Appeal PDA2000**
Lodgement Type: **Observation / Submission**

Validation Checklist	Value
Confirm Classification	Confirmed - Correct
Confirm ABP Case Link	Confirmed-Correct
Fee/Payment	Valid – Correct
Name and Address available	Yes
Agent Name and Address available (if engaged)	Not Applicable
Subject Matter available	Yes
Grounds	Yes
Sufficient Fee Received	Yes
Received On time	Yes
Eligible to make lodgement	Yes
Completeness Check of Documentation	Yes

BP40 ✓ SMD 28/8/25

Run at: 28/08/2025 12:05

Run by: Dáire Littleton Caden

An Coimisiún Pleanála
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August 20, 2025

An Coimisiún Pleanála's Case Reference No. PL08. 323171:

concerning the appeal by An Rinn Rua Holiday Park Ltd. of the Kerry County Council's decision of July 2nd, 2025 to deny planning permission with respect to its case reference no. **2460322**

A Chara:

To preface our remarks, please be advised that we are fully in agreement with the Kerry County Councils decision of July 2nd, 2025 to deny planning permission in this case, particularly with respect to environmental concerns in an area designated for protection of its natural habitat.

That being said, thank you for the opportunity to make an observation with respect to the above-cited appeal of that decision.

Our remarks fall under five headings:

1. Functionality, Zoning and Hierarchy Compliance

The site for this proposed large-scale development is a remote, rural headland flanked by two unspoilt beaches, "Trá na Sasannach" and "Trá Rinn Rua". The latter is more favourable for swimming and beach walks, while also being the one that would bear the most significant adverse impact from the proposed development.

The original large hotel building that was erected in the 1960s on the Reenroe headland would not meet current planning standards and policies. Construction of that hotel appears to have been conceived primarily to access available grant funding rather than being based on comprehensive market research, resulting in its subsequent failure.

Although it initially had some success, by the late 1970s, it was evident that the tourism market was changing. The hotel manager, by all accounts, was very competent, but the business was just not there. It subsequently went through a succession of owners and the hotel manager himself left in the early 1980s. The building's function as a hotel was conclusively proved to be unviable. The result was that, by 1990, it had declared bankruptcy.

Over the last 35 years since then, the building has been extensively vandalised, left open to the elements and otherwise lost all functionality other than as a cow byre and, latterly, as a sheep station. Indeed, the entire site has long since reverted to its natural function in terms of food production and is zoned as "agricultural". This is fully in keeping with the KCDP's overall commitment to sustainable development where it advocates that we should ***"recognise and promote the value of agricultural land to ensure sustainable food supply and the landscape value of the rural area"*** (KCDP 9.59). Indeed, Kerry County Council's agricultural zoning policies are generally geared towards protecting and

supporting the agricultural land base. These policies aim to encourage farming, discourage incompatible non-agricultural uses, and maintain the viability of agricultural operations in the long term. As the KCDP clearly states ***"the specific land use requirements of agricultural activity will be accommodated as a first priority"*** (KCDP 5.5.1). Indeed, the continual use of this site for animal husbandry for the last forty years completely accords with this objective.

However, in an attempt to capitalize on an unfortunate planning decision made sixty years ago, an application is now being made to replace this ongoing agricultural function with a residential one. While it is generally agreed that a mistake was made in good faith on the original application in the 1960s, we are now being presented with a plan to impose a much larger man-made footprint on this scenic coastal landscape. As before, no economic impact assessment or market analysis appears to have been submitted to demonstrate how current market conditions would support the viability and long-term sustainability of an even larger-scale residential development in this location.

Nevertheless, in his prospectus, the applicant promises to somehow convert this shell of a building into a "hotel", while simultaneously admitting that it would in fact consist of 22 self-contained apartments. It would, in effect, be an **apartment block** inappropriately erected on the pristine Kerry coastline!

Any description of this proposed development as a 'hotel' appears to rely on the site's historical use rather than its actual proposed function. The application cites 22 self-contained apartment units, which constitute residential accommodation rather than hotel use as traditionally understood in planning terms. This characterization may be intended to benefit from former rights associated with the original hotel permission, while potentially garnering some local support based on the site's past commercial function. However, the proposed development should be

assessed on its actual use and impact rather than historical designations that no longer reflect the site's operational reality.

We are not now talking about a resurrected hotel, but rather a sprawling residential complex containing, along with the apartment block, 169 family-sized housing units, various management structures, and an intricate, paved network of roads and parking spaces. Notwithstanding a few ancillary services, the proposed complex's principal purpose and function remain clearly residential.

Indeed, were it ever to be approved, it is more than likely that such an outsized and inappropriately located urban-scale development would, after significantly altering the landscape, eventually succumb to both market reality and the elements. It would, in short, become another visual intrusion and unsustainable footprint on the Kerry coastline.

Fortunately, however, the KCDP clearly states that ***"the primary location for new commercial development will be in the key towns and villages and that development in other towns and villages shall be commensurate with their level in the settlement hierarchy"***(KCDP 9.6).

We are also informed that ***"the appropriate density and scale of development (should be) relative to the settlement and location"***(KCDP 9.6.1).

We are additionally reminded that the KCDP's objective is to ***"ensure that holiday/second homes shall be located in established settlements in towns or villages and not in the rural landscape"*** (KCDP 5-23).

There is no distinction being made here between those homes that are owned and those that are rented or leased.

2. Ecological Impacts of Waste and Water Services

Effluent

Wetlands are a very important natural resource meriting protection. As outlined in the KCDP, "***We should facilitate and support the protection and enhancement of wetlands as nature-based solutions to flood management, climate change and the biodiversity crisis***" (KCDP 11-15). Any stretching of such functions through massive man-made infusions of treated effluent is bound to exacerbate the difficulties associated with both flood control and the protection of existing species.

Ecologists with "Wetland Surveys Ireland" identify this area as one requiring environmental protection in the Kerry Wetland Survey, 2015, a survey commissioned by Kerry County Council as an action of the County Kerry Heritage and Biodiversity Plan. As stated in its report earlier this year, "**Wetlands are important for biodiversity by supporting a wide range of specialist plant and animal species. In addition, wetlands provide important ecosystem services such as flood prevention, provision of clean water, and carbon storage. Despite the known importance of wetlands, they continue to be threatened and damaged from activities such as drainage and infilling**".

The proposed installation of the Molloy MI wastewater treatment system in Emlaghmore River Valley Bogs, a sensitive coastal bogland area, is fundamentally inappropriate and environmentally unsound.

Boglands are ecologically critical habitats protected under Irish and EU environmental regulations (i.e. the EU Habitats Directive and Irish Wildlife Acts). The introduction of wastewater treatment infrastructure threatens the integrity of these ecosystems which support a range of animal, fungal and plant species.

Additionally, undisturbed boglands and wetlands are crucial for water filtration, and wastewater can overload these natural systems, potentially damaging their ability to clean water and undermining their vital importance as a place for the storage of carbon.

The selection of this particular location for the installation of the Molloy MI wastewater treatment system poses serious risks of contamination and system failure, especially as the system would be adjacent to the proposed parking lot and within a zone where groundwater levels rise significantly at certain times of the year. This considerably heightens the risk of the introduction of pollutants and nutrients from wastewater, disrupting the natural balance, harming wildlife and ecosystems.

It is a common issue for wastewater treatment systems, such as the Molloy MI system, to be vulnerable to hydraulic overload. This occurs when the wastewater flow rate exceeds the system's capacity, which can lead to issues like solids moving into the drain field and clogging, or reduced efficiency of the treatment process. This threat would be particularly pronounced during the peak tourist months, when usage by more than 1,000 individuals on-site would lead to excessive liquid waste discharge. This seasonal strain could result in untreated or partially treated effluent being released into the surrounding environment and ultimately percolating down to the beach, with potentially severe consequences for both public health and protected habitats.

The installation of a sewage treatment plant should be contingent upon its proven long-term efficacy. The fact that Molloy offers an initial 2-year warranty provides scant assurance to anyone concerned about the enduring, problem-free functionality and efficiency of its system of wastewater management in such an ecologically sensitive area. The subsequent appointment of a local "caretaker" to maintain the system would not provide the necessary level of assurance.

Given the annual flooding above the highwater mark, the anticipated volume of treated water being offloaded onto bogland greatly heightens

concern. Such bogland already has a high level of water saturation prior to any dispersal from a treatment plant. Surface water would be especially evident during and following storms and high tidal surges, and inevitably lead to serious seepage onto Reenroe Strand. Even now, there exists sufficient natural seepage via the Emlaghmore stream, but an effluent treatment plant would materially increase its volume. The stream would indeed become a river, bisecting the beach.

As of now, Reenroe Strand is very popular with local families, given its gently shelving beach. Notwithstanding assurances provided by Molloy, the very existence of such an effluent treatment plant directly upstream from the beach would be a serious deterrent for swimmers.

Stormwater

The concern with stormwater and regular piped water pertains to both volume and erosion.

With the installation of so much hard cover surface throughout the proposed complex and 4 km. of piping, the cumulative effect of water discharge would be greatly increased.

The installation of a tarmac surface on the cliff walk would, by preventing moisture absorption, inevitably lead to further erosion, most especially along the coastal boreen section leading up from the Emlaghmore Road.

Of equal concern is the fact that the sheer volume of daily piped discharge from such a large residential development via the existing culvert under the coastal track and onto Reenroe Strand would also bisect the beach. We would now be creating yet a second stream running roughly parallel with the Emlaghmore River, thus effectively

cutting the beach into three distinct sections. This, quite obviously, would seriously impede the activities of both walkers and runners.

Indeed, between the seepage of treated effluent and the discharge of piped water, the character of Reenroe Strand would be permanently altered, much to the detriment of the local community.

3. Environmental Impacts of Construction

The Reenroe headland is a thoroughly inappropriate location for the kind of urban conglomerate being proposed by the developer. The extensive 5-year construction period being proposed would inevitably cause massive soil disturbance, the transfer of contaminants and the introduction of invasive species. At the same time, ground water quality would suffer, as would indeed any life forms therein. A cautionary note on this is sounded through the reminder that "***invasive plant and animal species are cited as the second greatest threat to biodiversity worldwide after habitat destruction***" (KCDP 11.2.4). Such issues also fall within the mandate of the "Kerry Parks and Wildlife Service", as evidenced by its recent grants to the Kerry County Council on projects dealing with both biodiversity and coastal conservation (Local Biodiversity Action Fund).

The proposed development, by virtue of its excessive scale and density, would fundamentally alter the established rural character of this sensitive headland. The extent of built development, comprising extensive road infrastructure, residential units, commercial accommodation units, administrative facilities and associated hard surface areas, would result in the overdevelopment of the site and would be seriously injurious to the visual amenities and rural character of the area.

Such intensive development would be contrary to the proper planning and sustainable development of the area and would constitute an unacceptable urbanisation of this rural coastal environment. Indeed, the anticipated congestion is such that it elicited a requirement from the planning department for turnaround room capable of handling fire-fighting trucks and ambulances. In this regard, the KCDP clearly states that "**Permission will not be granted for developments which cannot be integrated into its surroundings**"(11.6.3.2). With respect to the proposed development at Reenroe, that would certainly not be the case.

Moreover, in the interest of public safety, the entire public road system feeding into this conglomerate would have to be modified at great expense in order to accommodate the anticipated flow of large-scale vehicles, both during the 5-year construction phase and in the years thereafter. On a wider scale, the projected volume of service vehicles associated with the construction phase of the proposed development, coupled with the anticipated increase in private vehicles and mobile home traffic in subsequent years, represents a significant and unacceptable risk to the safety of drivers, pedestrians, and cyclists in the surrounding area. This heightened traffic burden would materially compromise road safety in a locality that does not have the infrastructure capacity to absorb such increases without adverse effects.

This concern is particularly acute in light of Kerry County Council's own commitments under the **Road Safety Action Plan for Kerry (2024)**, which was developed in partnership with the Road Safety Authority (RSA), An Garda Síochána, the National Ambulance Service, and Transport Infrastructure Ireland (TII), through the "Kerry Road Safety Working Together Group". The plan sets out an interim objective of achieving a 50% reduction in fatalities and serious injuries by 2030, with the longer-term vision of eliminating road deaths and serious injuries entirely by 2050.

To approve a development that demonstrably undermines these objectives would be inconsistent with both the letter and spirit of the Council's stated policy on road safety. It would also constitute a failure to adhere to the principles of sustainable development and proper planning as required under the Planning and Development Act 2000 (as amended).

4. Landscape Character and Visual Amenity

The provisions of the KCDP would appear to forbid the establishment of house clusters in visually sensitive landscapes that are in the open countryside. As stated, it strives to "**ensure that holiday / second homes shall be located in established settlements in towns or villages and not in the rural landscape**" (KCDP 5-23).

With respect to campgrounds, it is equally explicit when it states that "**camping sites should be located on appropriately zoned land within established/or adjacent to existing settlements**" (kcdp 10.3.5.1.).

The planning application under consideration combines both forms of residential accommodation, together with a 22-suite apartment building to replace the vacant building. The site proposed for this large complex is neither in or adjacent to existing local towns (Waterville, Cahirsiveen) or villages (Ballinskelligs, Portmagee).

Indeed, the proposed development site is located in open countryside, outside any settlement boundary as defined in the Kerry County Development Plan settlement hierarchy. Under the Plan's classification system, Reenroe does not constitute a village, town, or any recognized settlement tier that would support a development of this scale and nature. The Kerry County Development Plan establishes a clear settlement hierarchy (Section 4.2) that directs development to:

- Key Towns (Tier 1)
- Towns (Tier 2)
- Large Villages (Tier 3)
- Small Villages and Settlements (Tier 4)

The proposed site falls outside all of these categories, being located in 'Open Countryside' where Policy Objective RCI-1 restricts development to that which supports the rural economy and does not compromise its rural character.

The proposed development of 191 family accommodation units plus ancillary facilities would create a settlement larger than many established villages in Kerry. This scale of development contravenes the fundamental principle of the settlement hierarchy which requires development to be **'commensurate with the role, function and character of individual settlements'** (Policy Objective SS-1). Moreover, the application fails to demonstrate compliance with the sequential approach to development established in the National Planning Framework and reflected in the KCDP.

No evidence has been provided to show that appropriately zoned lands within established settlements are unavailable or unsuitable, as required before considering rural locations. Moreover, the settlement hierarchy is predicated on directing development to locations with adequate infrastructure and services. The proposed site lacks the **public infrastructure** (public water supply, public sewerage, public transport, emergency services proximity) that characterizes settlements identified for significant development in the hierarchy. While rural housing policies (Section 4.6) do permit certain residential development in the countryside, these provisions are specifically for those with a genuine need for rural housing, and not for large-scale commercial tourist accommodation. The proposed development cannot avail of rural housing policies as it constitutes commercial development that should be located within the settlement hierarchy.

Policy Objective TM-8 states that tourism development should be located in existing settlements where possible, and where rural locations are necessary, they must be of a scale and nature appropriate to the rural area. A development

accommodating over 1,000 people exceeds any reasonable interpretation of 'appropriate scale' for a rural location.

The proposal also directly contradicts National Policy Objective 3c of the National Planning Framework, reflected in KCDP policies, which promotes **compact growth** and the **sustainable development of existing settlements**. Permitting large-scale development in open countryside undermines this strategic objective.

As outlined above, the proposed development fundamentally contradicts the settlement hierarchy established in the Kerry County Development Plan. By proposing intensive tourist accommodation outside any recognized settlement boundary, at a scale that would create a new settlement larger than established villages, the proposal violates core strategic policies designed to ensure sustainable development patterns. The development fails the proper planning and sustainable development test by ignoring established spatial planning principles.

Indeed, the imposition of a large holiday rental complex on the natural landscape would inevitably jar the senses. A virtual town (pop.1036), with its tortuous road system connecting 144 trailer homes, 25 houses, 22 apartments, 20 campervans, innumerable hobbit huts and camp sites would significantly alter the headland. A planned new street of 25 houses, in particular, would be plainly visible from the Emlaghmore Road, the beach and the Cliff Walk, while most of the complex would be clearly visible from both the R567 and the road to Dungeagan. Needless to say, the proposed apartment building would be conspicuously evident from all directions.

Further to which, the KCDP's Policy Objective (LCA-5) protects Kerry's coastline visual integrity as viewed from the sea, essential to the Ring of Kerry tourism product. This proposed development would create highly visible built infrastructure on a mostly undeveloped headland, directly contravening this protection.

On the headland itself, the constant ingress and egress of motorised traffic would generate more than enough **noise and light** to cause irreparable ecological damage. Light pollution would be of particular

concern with respect to its impact on South Kerry's Dark Sky Reserve. As the KCDP states "***This is a significant tourism attraction, and as a result the control of light pollution in this area is important***" (11.3.3.1).

During the 5-year construction period, the nesting and feeding habits of birds and small mammals would have to drastically change, forcing migration off the site. That any of this should be allowed to happen in an area already assigned protective labels such as **SAC, SSAA, SPA** and **PNHA** and accorded **Natura 2000** status should alone make this proposed development contrary to policy. More specifically, it is clearly stated in the KCDP that "***development plans cannot contravene the EU Habitats and Birds Directives or adversely affect Natura 2000 sites***" (KCDP 1.7).

Meanwhile, in the eastern portion of the site, the seasonally inundated wetlands would be subjected to the additional stress emanating from the proposed treatment plant for the enormous amount of effluent accompanying such a huge development. In addition, the high flood risk factor in this low-lying landscape undermines the very premise upon which effective sewage treatment is based.

On the beach below, even the volunteers in the "Ballinskelligs Environmental Action Group" (BEAG) would be hard-pressed to continue with their periodic cleanups, given the anticipated litter associated with an influx of seasonal residents and campers.

Meanwhile, the noise emanating from so many people in holiday mode, together with the associated road traffic, would ensure that much of what currently makes Reenroe special would be gone for good. Rural tranquility would be replaced by urban bustle, and commercial revenue would be prioritised over local well-being.

The turnover of holiday-makers would peak every summer, and then they would be gone. Deterioration of the visual and ecological qualities of the natural landscape would remain.

5. Impacts on Community and Residents

Recreational Amenity

Quite apart from the Reenroe headland being zoned "agricultural" and leased to a local sheep farmer, it provides natural shelter for the beaches flanking its eastern and western sides. The more easily accessible beach (Trá Rinn Rua) plays an especially important role in local life, as also does the headland's Cliff Walk (endorsed by "The South Kerry Development Partnership").

While much effort has been expended on attempting to prove the technical feasibility of the proposed project, that does not determine if it is the best interests of the local community. To the contrary, the proposed large-scale residential development on this exposed coastal headland would seriously injure the visual amenities and natural beauty of this particularly sensitive landscape. This type of development would be wholly inappropriate to the character and setting of this section of the Kerry coastline. It would, moreover, harm the living conditions and rights of the local community.

In this relatively remote part of South Kerry, local walkers, swimmers, runners, hikers and fishers habitually use what nature has to offer. Apart from its glorious scenery, what makes Reenroe particularly attractive is its serene and uncrowded ambiance. Even on a rainy day, some simply drive there to gaze out to sea. Reenroe is a special place, and not one to be radically urbanised for commercial purposes.

Residential Amenity

Noise pollution (whether from constant lorry traffic or the operation of heavy machinery) would have a devastating, ongoing impact on neighbouring residents, particularly those in the three long-established houses on-site. No relevance should be attached to the developer's assumption that these houses are only occupied in the July-August period, as this is not true.

Implementation of the proposed development plan would destroy the residential amenities of our own home. The below ground service lines to our home (water, electricity, phone) could well be severed at any time during the 5-year construction period. That and the constant noise level would make our house virtually uninhabitable and certainly unenjoyable, while simultaneously lowering its market value.

Even after the initial 5-year period had elapsed, the devaluation of our property would remain. It would have become a mere adjunct to a newly-created urban landscape. Immediately to the rear, a new cul-de-sac flanked by 25 houses would remain, with the nearest such property being a mere 10 metres from our own. The fact that the applicant has chosen to call them lodges as opposed to houses does not take anything away from the fact that these would be 3-bedroom properties flanking a newly-constructed road graced by municipal-type street lights! Clearly, encroachment of this type of urban development would destroy the intrinsic rural character and ambiance of our property. It would, in effect, become an involuntary appendage to a newly-created town imposed on the countryside without adequate justification.

Separate Development

Meanwhile, the outstanding seaward view from our house would now be permanently marred by the imposition of four highly visible and obtrusive structures on the adjoining floodplain below our house, namely a surf shop, a change room building with extensive bathroom facilities, a café and an associated parking lot.

Clearly, a strategic flood risk assessment (SFRA) of this specific coastline should have been carried out prior to any plans being made for its commercial development. Flood events, emanating from rising sea levels and more frequent extreme weather events should be cause for very serious concern. Already, from local observation, this particular floodplain is subject to both annual flooding and the deposition of stones hurled up by enormous breakers during winter storms. Climate change will indubitably exacerbate this situation over the coming years.

Nevertheless, the applicant proposes the construction of a separate development on this highly inappropriate site. It would consist of three buildings, serviced by six toilets and six shower stalls. The stormwater dispersal from this separate development would add considerably to that already being piped from the rest of the proposed development, with its associated prospect of even more serious beach scouring. It is even more concerning that no indication is given as to how the sewage from this facility would be managed, given its location on the opposite side of the public road and downstream from the proposed treatment plant.

The location of this commercial cluster would also be highly inappropriate, in as much as it would lead to traffic congestion and obstruct the only road access to our home. The plan is to situate the cluster at the junction where the public road meets the coastal access route to our property, with said junction also doubling as the starting

point for the Cliff Walk. To add to the problem, the cluster features traffic access openings onto both the public road and our sole access road.

When the anticipated traffic fostered by these business outlets is added to that of beach goers and hikers, traffic bottlenecks would inevitably ensue. Access to and from our property would be seriously hindered and might well pose health risks in a medical emergency.

Summary of Grounds for Refusal

This proposed development fundamentally contradicts the Kerry County Development Plan and principles of proper planning and sustainable development on multiple critical grounds:

Settlement Hierarchy Violation: The proposal seeks to create a settlement of over 1,000 people in open countryside, outside any recognised settlement boundary. This directly contravenes the KCDP's settlement hierarchy (Section 4.2) and Policy Objectives SS-1 and RCI-1, which restrict rural development and direct growth to established settlements with adequate infrastructure.

Environmental Non-Compliance: The development threatens protected Natura 2000 sites, SAC, SPA, and PNHA designations, in direct contravention of EU Habitats and Birds Directives. The proposed wastewater treatment system in sensitive bogland violates KCDP policies on wetland protection (11-15) and poses unacceptable risks to water quality and coastal ecosystems.

Infrastructure Inadequacy: The site lacks essential public infrastructure (water, sewerage, transport, emergency services) required for a development of this scale. The proposal would also create significant road safety hazards, contrary to Kerry's Road Safety Action Plan 2024 objectives.

Visual and Environmental Impact: The development would create an inappropriate urbanisation of a visually sensitive coastal landscape, contrary to KCDP Policy Objectives LCA-5 (coastal visual protection) and 11.6.3.2 (integration requirements), while threatening the Dark Sky Reserve designation.

Mischaracterisation of Use: The description as a "hotel" development appears designed to benefit from historical permission while actually proposing large-scale residential accommodation that should be assessed under current residential and tourism development policies.

Recommendation

An Coimisiún Pleanála is respectfully requested to endorse the decision of the planning authority to deny permission for this application as it:

1. Contravenes fundamental settlement hierarchy policies and the sequential approach to development.

2. Fails the proper planning and sustainable development test under the "Planning and Development Act 2000" (as amended).

3. Threatens protected environmental designations and EU directive compliance.

4. Would create a precedent for inappropriate rural development contrary to national and local planning policy.

5. Lacks adequate infrastructure capacity and poses public safety risks.

In short, the proposal represents exactly the type of unsustainable, car-dependent development that modern planning policy seeks to prevent.

On the natural scale, it poses a profound threat to the natural environment and ecology of the Reenroe Headland and its adjoining wetlands and beaches.

On the human scale, it would completely transform an area and a way of life, while negatively impacting the views and prospects of the area.

On the regulatory scale, many of its propositions contravene key provisions of the Kerry County Development Plan and are contrary to the proper planning and sustainable development of the area.

We therefore respectfully request that the appeal lodged by An Rinn Rua Holiday Park Ltd. be denied.

Is sinne le meas,

Eugene McMahon

Anne McMahon

Kerry County Council,
County Buildings, Tralee, Co. Kerry.
Tel: (066) 7183582 Fax: (066) 7120328
E-mail: plan@kerrycoco.ie;

Comhairle Chontae Chiarraí,
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Guthán: (066) 7183582 Faics: (066) 7120328
Web: http://www.kerrycoco.ie

Planning and Development Regulations 2001 (as amended).

ACKNOWLEDGEMENT of RECEIPT of SUBMISSION or OBSERVATION on a PLANNING APPLICATION

17/06/2024

Eugene and Anne McMahon,
Reenroe,
Emlaghmore West,
Ballinskelligs,
Co Kerry.

PLANNING AUTHORITY NAME: **Kerry County Council**

Ref: 2460322
APPLICANT'S NAME: RÍNN RUA HOLIDAY PARK LTD.
DEVELOPMENT ADDRESS: REENROE EMLAGHMORE WEST BALLINSKELLIGS, CO. KERRY
DEVELOPMENT DESCRIPTION: DEVELOPMENT AT A 22.6HA SITE AT REENROE, EMLAGHMORE WEST, BALLINSKELLIGS, CO. KERRY. THE DEVELOPMENT WILL CONSIST OF AN INTEGRATED TOURISM/ LEISURE PARK FIRST COMPRISING OF THE PARTIAL DEMOLITION, EXTENSION AND REDEVELOPMENT OF THE EXISTING DERELICT HOTEL, TO INCLUDE; 4 NO. SELF-CATERING STUDIO APARTMENTS; 3 NO. ONE BED SELF-CATERING APARTMENT; 15 NO. TWO BEDS SELF-CATERING APARTMENTS; A BAR; DINING ROOM; ROOFTOP RESTAURANT; SHOP; ESB SUBSTATION AND SWITCH ROOMS; STANDBY GENERATOR ROOM, AND BIN STORES.
THE REMAINDER OF THE PROPOSED DEVELOPMENT WILL INCLUDE THE FOLLOWING: 6 NO. HOBBIT HUTS, 21 NO. GLAMPING PODS, 25 NO. HOLIDAY HOMES, 144 NO. MOBILE HOMES, 20 NO. CAMPERVAN STANDS, 0.8HA TENT CAMPING AREA, WASHROOM AND TOILET FACILITIES 58M2, MAINTENANCE BUILDING 618M2, LEISURE COMPLEX (WITH A SWIMMING POOL) 1,339.5M2, SURF SHOP 191.7M2/CAFÉ 126.5M2, NATURAL PLAY AREA, CENTRAL PARK AREA, 151 NO. CAR PARKING SPACES, INCLUDING COACH PARKING, 40 NO. BICYCLE SPACES, EV CHARGING POINTS, INTERNAL ROADS, FOOTPATHS, WASTE STORAGE AREAS, WIDENING OF BEACH ACCESS ROAD TO 6M FOR TWO-WAY TRAFFIC INCLUDING A PEDESTRIAN/CYCLE PATHWAY, UPGRADING OF EXISTING CLIFF WALK, NEW ACCESS ROAD AND SERVICES LINES TO TWO NEIGHBOURING DWELLINGS TO THE SOUTHWEST OF THE DEVELOPMENT SITE, NEW WASTEWATER TREATMENT SYSTEM WITH CLEAR WATER PUMP STATION AND UV SYSTEM, DRAINAGE AND

PERCOLATION AREAS, 2 NO. STANDBY GENERATORS, WATER SERVICES AND LANDSCAPING. THE PROJECT INCLUDES ALL ANCILLARY AND ASSOCIATED WORKS NECESSARY TO FACILITATE THE DEVELOPMENT.

AN ENVIRONMENTAL IMPACT ASSESSMENT REPORT HAS BEEN PREPARED IN RESPECT OF THE PROPOSED DEVELOPMENT AND ACCOMPANIES THIS APPLICATION.

Dear Sir/Madam,

A submission/observation in writing has been received from Eugene and Anne McMahon on 13/06/2024 in relation to the above planning application.

The appropriate fee of €20.00 has been paid. (Not applicable to prescribed bodies)

The submission/observation is in accordance with the appropriate provisions of the Planning and Development Regulations, 2001 (as amended) and will be taken into account by the Planning Authority in its determination of the Planning application.

Yours sincerely,

pp Sheilanne Brosnan

A.O. Planning

This is an important document!

Keep this document safely. You will be required to produce this acknowledgement to An Bord Pleanala if you wish to appeal the decision of the planning authority. It is the only form of evidence which will be accepted by An Bord Pleanala that a submission or observation has been made to the planning authority on the planning application.