

File With _____

SECTION 131 FORM

Appeal NO: ACP 323171

Defer Re O/H

Having considered the contents of the submission dated/ received 19-09-25
from

Stephen Kellegan 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 planning issues

E.O.: Rosa O

Date: 3/10/25

For further consideration by SEO/SAO

Section 131 not to be invoked at this stage.

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

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

Please prepare BP _____ - Section 131 notice enclosing a copy of the attached submission

to: _____ Task No: _____

Allow 2/3/4weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORM

Appeal No: ACP 323171-25

M _____

Please treat correspondence received on 19/9/25 Reg Post as follows:

1. Update database with new agent for Applicant/Appellant _____ 2. Acknowledge with BP <u>23</u> 3. Keep copy of Commission's Letter <input type="checkbox"/>	1. RETURN TO SENDER with BP _____ 2. Keep Envelope: <input type="checkbox"/> 3. Keep Copy of Commission's letter <input type="checkbox"/>
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Amendments/Comments
<u>Stephen Kelleghan Response to S131</u>

4. Attach to file (a) R/S <input type="checkbox"/> (d) Screening <input type="checkbox"/> (b) GIS Processing <input type="checkbox"/> (e) Inspectorate <input type="checkbox"/> (c) Processing <input type="checkbox"/>	RETURN TO EO <input checked="" type="checkbox"/> <i>James Sweeney</i>
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	Plans Date Stamped <input type="checkbox"/>
	Date Stamped Filled in <input type="checkbox"/>
EO: <u>Rosa</u>	AA: <u>[Signature]</u>
Date: <u>19/9/25</u>	Date: <u>22/9/25</u>

Planning Authority Reference: **2460322**
Site location: **Reenroe, Emlaghmore West, Ballinskelligs**
Developer: **Rínn Rua Holiday Park Ltd.**

18/09/2025

Dear Sir/Madam,

I received your letter dated **10th September 2025**, Case Number **ACP-323171-25**,
Planning Authority Reference Number: **2460322**

Below are my further objections

From the additional information provided I feel that none of my objections were considered, from what I can see slight adjustments have been made to the wastewater system only, however it does not take away from the fact that the location is still of a high environmental **RISK in this location** , it is still with the same low lying area (possibly not even a meter above sea level.)

Another point to make is about the daily amount of wastewater stated in the revised Civil engineering report that states there would be **144,400 litres of wastewater PER DAY** , to put that in context , that's waste water for an extra **963 people** approx. in the beach/bay area location per day (equivalent to having **241 dwellings with accommodation for 4 people**).

The archaeological survey didn't reveal anything new, however, that's not the point, the application still does not take the fragile sites already identified on the beach into consideration with regards the proposed increased activity in large numbers, this is a fragile beach, which at this moment has most of the sand removed on the western side from sea erosion, also as recent as 4 weeks ago revealed the wreck of a large ship on the western side near the proposed site at low water.

I also object to the use of the word "**HOTEL**" being used , when in fact this is a block of fully **self-contained apartments**, that could be rented , leased or sold individually as a dwelling at a later stage, this is **Not A Hotel**.

So, I would like to lodge my objections again and the notes above in light of the new information provided by the developer:

Please note my objection to the above planning application in its current form, I've detailed my reasons below.

- **Incorrect development type for Location**

A Development of this kind in this location **conflicts** with the **Kerry County Development Plan 2022-2028** Volume 6 section **1.12.2 Caravan, Glamping and Camping developments**, its states – "**Parks will not generally be permitted in proximity to the coastline, outside of lands specifically zoned**" - this site **is** on the **Coastline** and was never specifically zoned for this type of "Holiday Park" development and structures.



- **Wastewater Sewerage Location Risk**

The development wastewater sewerage plant has been proposed directly behind the Reenroe Beach barely above sea level, it is a low lying area that bounds the beach that is continuously being eroded by the frequent storms and climate change, this is of a high environmental **RISK in this location**, and surrounding beaches Trá na Sasanach, Emlaghmore river and Ballinskelligs Blue flag beach.

The extreme risk of odour and pollution is one that could be detrimental to water quality, wildlife habitation and shore nesting birds, fish stocks and tourism, and in turn pose a risk for the river Inny and Lough Currane which are World renowned Atlantic Salmon and Sea trout fisheries with spawning fish returning through Ballinskelligs bay, there is also a risk to the Sea Bass fisheries within the Reenroe area.

In general, the location and size of such a wastewater sewerage treatment plant is a risk to the immediate surrounding area of Ballinskelligs Bay and Inny Estuary which is a **Special Area of Conservation** governed under the S.I. No. 287/2018 - European Union Habitats (000335) Regulations 2018.

This area is also highlighted in the **Kerry County development plan Volume 5 section 3.2** as an area of **Coastal flooding and erosion**; this erosion can quite clearly be seen directly in front of the area proposed for the waste water sewerage treatment plant for this planning application.

- **Archaeological site damage risk**

Within Reenroe beach are historical sites detailed in "***The Iveragh Peninsula – An Archaeological survey of South Kerry***" page 26-27, it details a "pre-bog field wall and 27 Cultivation ridges, in recent years these are becoming more frequently visible after storms as the sands are eroded away, with the proposed increase of approx. 1000 people over the holiday periods there is a huge risk not only to these but to the Special area of Conservation and the protection within.

- **Road structure and traffic risk**

The scale of this development will create issues for the already deteriorating road network, it will create a risk to locals and wildlife on link roads that run directly to Reenroe beach, these roads are not suitable for the increased amount of traffic and size of vehicles that this would generate, the road that runs from "**Barrys Cross to Reenroe Cross**" is already an issue at busy holiday times and would not be suitable for the increase or size/weight of camper vans, caravans, buses and trucks to service such a site.

- **No long-term Sustainability, over commercialising Kerry Tourism in a visually sensitive area**

This is not a **“Sustainable Development”** for future generations in the South Kerry area. There is very little long-term benefit to the community with this type of development, construction is minimal, the units are of a **mobile nature** and are manufactured elsewhere and transported in, they are basically “plug-n-play” units. All units are **“Self-Contained”** and within a caravan park style development and it is highly likely that access and facilities would be limited to anyone not a “resident” which would be normal with this type of facility. There would be minimal employment with only seasonal work and no long-term employment opportunities. There is no long-term benefit to the local community only short-term gain.

There is an onus on the current generation to protect and maintain the area environmentally, economically and sustainably for the future generations and protect what is **“Kerry Tourism”** and why tourists come here **from all over the world for unspoilt landscapes, beaches and away from commercialised “Holiday Resort” type locations.** There is a balance as to how that is achieved how it lives with local communities. A development of this nature would only open the door for future developments of this type around **South Kerry further commercialising the coastline**, thus conflicting with what **Kerry tourism** is promoting, Kerry attracts 1.5 million tourists annually (*Kerry CoCo tourism website*), they come for the natural unspoilt landscape, rich in community, history and tradition.

This site is part of the **coastline**, and this application cannot be looked at in isolation within the immediate area of the site, it is located in an area of World-renowned extreme beauty, the site can be seen from an elevated visible line of sight for miles from the **“Ring of Kerry” N70** from Waterville to Coomakista, and a development of this nature would not be in keeping with that coastline beauty and environment and why people visit South Kerry and the greater KERRY area.

The natural beauty of the coastline is also pointed out in the **Kerry County development plan** volume 1 within **Landscape Review** page 279-280 it classes the Landscape around the Ballinskelligs area (inclusive of Reenroe) an area of **“Visual sensitivity = HIGH”**. This type of proposed development would have an adverse effect on the natural beauty and Tourism for the location into for future generations.

In the map below from the **Kerry County Development plan volume 4 Maps – Map P**, it points out the **“Visually Sensitive Area”** designated by **Kerry County Council**, I have circled the proposed site location in a red ring to highlight that it is surrounded by numerous Views and Prospect points for miles around Ballinskelligs bay from the **Ring of Kerry N70 road** and the **R566 & R567**. In short it would be visible for miles.

Also in the **Kerry County development plan** volume 1 appendices page 113 where it states – **“Due to the coastal nature of this area, overlooking Ballinskelligs Bay and Kenmare Bay, it has a high scenic value,”** although this is with regards wind turbine locations the sentiment remains the same.

- **Medical and Public services**

The proposed increase in population would put a strain on the already stretched Local Medical services that are available to the local population, only recently proposals at a Ministerial level have been put forward to provide 1 additional GP to deal with the local population needs that are already suffering, this is also reflected with other public services - Garda, Fire and Ambulance service numbers are already inadequate to deal with the local populace never mind for such a proposed population increase with a development like this.

- **Water Supply and infrastructure**

Water supply is already under pressure during the summer period at a local level, with the size and scale of this proposed development it is questionable if there would be sufficient water services to supply the development on the scale and type proposed.

- **Kerry International Dark Sky Reserve**

As per the ***Kerry County Council website*** -

The Kerry International Dark Sky Reserve has been designated Irelands first International Dark Sky Reserve and is one of only three gold tier reserves on the planet and the only gold tier reserve in the Northern Hemisphere.

It is also the only 'living' reserve on the planet where locals live and work in the reserve, under a blanket of stars!

The reserve includes the following areas in South Kerry: Kells, Caherciveen, Portmagee, Valentia Island, The Glen-St. Finian's Bay; Ballinskelligs; Waterville; Caherdaniel and Dromid.

Visit this region of Kerry for spectacular views of the Milky Way, the Andromeda Galaxy, Star Clusters and Nebula and much more.....enjoy the dark side of Kerry!

[Enjoy the Stars | kerrycoco.ie](http://kerrycoco.ie)

With over **200+** external site lights within this holiday resort proposal, situated on the headland visible for miles from around the bay, not including the internal illumination emitted from each self-contained unit and buildings, a development of this scale/type would be a **RISK** to losing the **Dark Sky Status** for the Ballinskelligs Bay area and the income generated by the related tourism.

- **Other concerns**

It is clearly pointed out in this proposal that all the units are of a **"Self-Contained"** nature, most are built for a "mobile" nature and in an exposed environment such as Ballinskelligs bay with increased storms it is questionable as to the suitability for such a site on a head land exposed to the Atlantic. The development would have a short operating season, thus it may not be commercially viable purely based on tourism, my concern is - should this become an issue, that the units could be "repurposed" from short term tourism letting to **"long term living"** in a location that's not fit for that purpose.


Conclusion

A Holiday Park development of this size and nature in this location of natural beauty and culture would not enhance the **Kerry tourism profile or Ballinskelligs**, it would over-commercialise the area and coastline opening the door for further developments of this nature ruining the views and vistas for what Kerry is known for World wide. There is also an environmental, wildlife concern/risk to Reenroe beach with both the additional population and services dealing with waste water sewerage located beside a coastline beach that is being eroded on a daily basis, it is also beside an **SAC**. Insufficient road network and Stretched Public services are also a concern for the increase in population, and It would also have no benefit for long-term structured employment and economic benefit to the community, as is the nature of this type of development. It is not in keeping with the Kerry County Development plan.

Alternative

I do believe however that the Ballinskelligs locality would benefit from a proper **"Hotel"** purposed solely for the use of **"Tourism"** on a scale in keeping with the beauty of the area and the Kerry County development plan, I feel that this could be achieved on this site and would be beneficial to the area, the economy and long-term employment. I feel this could be the right balance between a commercially viable business and the sensitive environmental area of beauty that is South Kerry. A **Hotel** in this location would be a benefit to the Owner, Community and tourist alike.

Yours Sincerely,


Stephen Kelleghan.

Emlaghmore East

Ballinskelligs

Co.Kerry.