3rd Party Appeal

Correspondence Coversheet

Case Number	Case Priority	Case Lodged On	Case EO	PA Reg. Reference
PL-500109-WX	Normal	21/10/2025	Cathy Carleton	20250962W

Case Details

Planning Authority
Wexford County Council

PA Reg. Reference
20250962W

Summary Description
10 year planning permission for development of an Integrated Tourism Resort Complex. A Natura Impact Statement (NIS) and Environmental Impact Assessment Report (EIAR) has been submitted with the application.

Site Location
Beak and Nemestown, Kilmore Quay, Co. Wexford.

Correspondence Details

Correspondence Type	Received From	Lodged On	Validity	Valid OH Req
3rd Party Appeal	Andi McGarry and Lisa and Philippa Kinneen	30/10/2025	Valid	No

Issue	Participant	Representative
BP01M — English	Andi McGarry and Lisa and Philippa Kinneen	—

Response Date Applicable	Number of Days Allowed	Keep Copy of Letter	Return Docs	Keep Envelope
■	28	■	☐	■

Comments
—

Filing

Attach to File ☐

Return to EO ☐

Signatures

Signed Cathy Carleton

Cathy Carleton, Executive Officer

Date 30/10/2025

Signed LM

Lauren Simone Murphy, Administrative Assistant

Date 6/11/25

Correspondence Coversheet

Payment ID: **FEE-PAY-000236**

An Coimisiún Pleanála

Section:	Processing
PA Name:	Wexford County Council

Submission Reference:	20250962W

Date:	30/10/2025
Name:	Andi McGarry, Lisa Kinneen, Pippa Kinneen
Total:	€220.00

Attachments/Comment:	—

Created By:	Pádraic Keane
Channel:	By Hand

Multiple

DOD: 6/10/25

LID: 3/11/25 ✓

Ack ✓

Name + address ✓

The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902,

AN COIMISIÚN PLEANÁLA
LDG- ABP-324236
ACP-
30 OCT 2025
Fee: € 220 Type: Cash
Time: 10:43 By: Hand

Re: Planning number 20250962W 10 year planning permission for development of an Integrated Tourism Resort Complex. Beak/Nemestown, Kilmore Quay Co Wexford.

ABP Reference: PL-500109-WX.

Dear Sir/ Madam,

We wish to appeal the decision on the above Planning Application that was granted on the 6th of October 2025 by Wexford County Council. Please find enclosed the fee of €220, receipt of observation (from address: The Moorings, Kilmore Quay, Wexford) and the supporting documents for this appeal. We wish to appeal the decision on the following grounds;

1. Development Not in Keeping with Size and Scale of Village or Landscape

Kilmore Quay's LCU (landscape character unit) is identified as a distinctive coastal landscape and an area with a high sensitivity to change which means it has a limited ability to absorb new developments, as stated and defined by Wexford County Council in the Wexford County Development Plan 2022-2028. The Integrated Tourism Resort is alien to a largely untouched landscape and skyline and this development would impinge on the uniformity of the area. According to Fáilte Ireland one of the main reasons tourists come to Ireland is *because* of these untouched landscapes. We should (according to and advised in the WCDP 2022-2028) be using and developing on existing structures instead of encouraging destruction of landscapes and habitats for developments in known and identified sensitive areas. Fáilte Ireland's draft Strategic Environmental Assessment Environmental Report for Wexford (2025) stated that tourism development has the potential to change the landscape character of a county's distinct landscapes.

This is an irreversible development being put upon a working fishing village which is already thriving under tourism by utilising small local businesses (which is the appeal of the area to valued seasonal visitors). The development design and layout is not in keeping or respectful to the look, feel, landscape or culture of the village. It is not in keeping with the vernacular architecture, St Peter's Church or the protected sites that surround it, such as the SPA Salee Islands, SPA Ballyteige Burrow

or SAC Folorns Point. It will dwarf the surroundings of the tranquil site adjacent to the village of Kilmore Quay and the perennial houses of Nemestown, the Little Beach and the recommended geological NHA St Patrick's Bridge which is a haven for wildlife. The build is a contradiction to the WCC Development Plan (2022-2028) of protecting Wexford's natural heritage landscapes, protecting and empowering rural communities and again not developing on sensitive coastal landscapes so as not to speed up issues such as overdevelopment, coastal erosion, rising sea levels which affect communities and wildlife. The overall design of the Tourism Resort Complex is overbearing and fails to integrate with the village successfully. Development is the greatest threat to archaeological, architectural and cultural heritage. Sites and features of historical and cultural significance can be lost through development on, or adjacent to, sites or their setting impacted. Where is the logic of compromising what makes this working fishing village of 447 people (2022 census) unique and authentic?

2. Roads and Traffic

There will be simply too much traffic both in the construction phase and the operational phase on the R739 and the L3068. There will be construction traffic and heavy machinery on narrow rural roads. This will be for 3+ years. The roads within the village will not be able to cope, we do not have the infrastructure to facilitate the proposed resort traffic in the operational phase. It is envisioned that during their stay guests will be using other means of transport into the village i.e. walking/cycling. This is all assumptions - that people won't want to use their car in a rural area (a village where having your own transport is necessary to get around). As the resort will be open all year round, we cannot imagine most guests walking/cycling to the village or beyond in the Winter. The extra daily 1,034 vehicle trips (Traffic and Transport Assessment p.30) all year round to and from the resort will be a hindrance not only to residents' daily lives but to emergency services such as Guardaí, ambivalences, fire services and lifeboat. Many of the lifeboat volunteers travel into the village. Any delays in getting to the lifeboat will potentially impact the time to save lives in our working fishing village and harbor. There could also be an increase in collisions either with cyclists or vehicles where cyclists or ebikes may not know they are sharing roads with pedestrians. The village itself has narrow roads and becomes congested in the Summer. With no footpaths it poses a potential hazard for pedestrians which the Resort could exacerbate by causing an increase in traffic all year round.

3. Water

The water quality in the village is poor and regularly cuts off around the County. If the Resort Complex is built this could become even more of an issue as there will be a restaurant, swimming pool, lodges, conference centre, bathrooms and 800 plus people to avail of these facilities and amenities. Changes in land use can also have an effect on water which the site will be doing as it is currently agricultural land. The tourism sector interacts with many different sectors and therefore, can

influence water quality and quantity particularly during peak periods. The development could put pressure on water quality, as could the tourism activities that follow.

4. Sewage

Tourism in County Wexford has the potential to increase the stress on urban wastewater systems, and in turn increase stress on the sensitive areas (Failte Ireland, SEA ER of Wexford, 2025). The sewage in Kilmore Quay has been under pressure for a number of years. The sewage system and treatment plant seemed to finally be resolved, although many Nemestown residents are not connected to it. This development could put a strain on the system and this influx may negatively impact current and future developments for residents and local businesses in the village.

5. Impacts on Residents

There will be countless impacts on residents. With 61 objections to this planning application, this makes it quite clear that it is already impacting many people in different ways. In the construction phase, which will last three years, there will be a great deal of noise pollution, light pollution and dust pollution with works going on from 07:00am- 07:00pm which will cause a great deal of stress and impact the residents' physical health and mental health. In the operational phase there will be a loss of natural light, potential effects on their water and sewage i.e being cut off, possible noise pollution from the resort guests and longer wait times and access to local amenities, due to the resort's proximity to the village. As well as affecting them in terms of seeing a place of great geopiety and beauty getting stripped away and replaced with something not in keeping and in some cases looking into their homes and breaching their privacy. No amount of mitigations will make these impacts disappear.

6. Tourism

The current level of tourism in Kilmore Quay is mostly manageable and welcomed. Tourism can be great for an economy, but if not carried out responsibly it can lead to consequences like destroying the authenticity of a place, culture, community or wildlife and can lead to overtourism and overdevelopment. Fáilte Ireland in the SEA ER of Wexford 2025 stated: *Tourism activities and the development of associated infrastructure close to ecologically sensitive areas can give rise to additional pressure on the biodiversity of these areas. Since many tourism sites in Wexford are tied to natural landscapes, protecting nature will be essential for adaptation.* Whist the EPA (2024) state: *Tourism has historically been an important sector of the Wexford economy. Wexford's diverse natural landscape, including mountains, rivers, and extensive coastline enhances its appeal. The tourism sector has resulted in significant pressure on water, waste and road infrastructure in many popular*

tourist destinations. These points of concern for Wexford's tourism industry should be fully considered in regards to approving this development.

The construction stage may also harm local businesses that cater to tourism. It may discourage customers to stay in B&B's / Guesthouses closest to the development. Not only will it affect their views which is a unique selling point for B&Bs and Guesthouses in this area but they will also suffer in the construction phase due to dust and noise created by construction. These and other local businesses of all kinds have worked hard for and built up the tourism industry in Kilmore Quay and the surrounding areas up to this point. People come here for what we already have, a remote authentic fishing village with small local businesses, beaches, thatched cottages, working harbour, landscapes and the Saltee Islands. The Little Beach is quite small and is a popular swimming spot with visitors and residents alike. The Burrow is marked as unsafe for swimming and is not as widely used for this purpose by visitors and families. Thus, the extra resort visitors would come to the Little Beach and this could result in overcrowding on the beach. It may also lead to problems for fishermen on the working harbours. With a lack of parking in peak Summer months, many visitors still park on the piers affecting the fishermen's work. On the other hand, if the visitors remain in the Resort this may lead to the resort monopolising the tourism business leading to no economic benefit for local businesses and people. To risk people's livelihoods and our nature with something which may not be economically viable in the end could be considered as unjust.

7. Lack of Meaningful Engagement

This is Kilmore Quays biggest development to date. To have one consultation in May 2025 about a project which is going to change so many variables and which has been considered by the WCC since 2023, could be considered as unfair by the community. Kilmore Quay has had development in the past which locals and residents have accepted such as a caravan park, new roads, promenades with lights, developments to the piers, chain stores replacing small businesses to name a few- all the while adapting to an influx of tourists. Therefore not being 'anti-development' by any measure. Although changing the village, most of these previous developments have not drastically changed the character of Kilmore Quay overnight. The layout and design of this development has Kilmore Quay becoming a side note and afterthought in its own village. We disagree with the timeframe and planning given for this. There was little time to comprehend and read the application and its accompanying documents on the planning portal. This proposal has had a few years to formulate and the 61 objectors got a few weeks to write and submit an appeal. There seems to be a focus on the economic benefits of the resort without consideration for the community and a lack of meaningful engagement throughout.

8. Design and layout

The Planners Report (p.33) states '*that the development has been designed in such a manner that the integrity of Kilmore Quay will be maintained and significant negative impacts on the character of the village will be avoided. In addition, the proposed separation distance between existing homes and the proposed tourist resort will help to avoid loss of residential amenity'*. We disagree with this statement. In some instances parts of the resort buildings and lodges are looking into houses and windows and it is a breach in privacy. *"The Proposed Development can be defined as a hotel complex outside a built-up area with a site area of 20.3 hectares.."* The Resort site is not outside a built up area but adjacent to a built up area and once built, will be part of this built up area.Wexford County Council, in approving this project are establishing a permanent complex upon a community, the design and layout of which, does not match this working fishing village's character. It could be considered as a mismanagement of protected and unprotected sites and of a village full of cultural and built heritage.

9. Erosion

Various parts of the bankside from St Patrick's Bridge down to Kilmore Quay are susceptible to erosion. An increase in activity on shorelines is proven to contribute to erosion and disturb local ecosystems. The Tourism Resort Complex would be built on an area identified by the OPW as prone to erosion (Irish Coastal Protection Strategy Study, 2013). The Wexford County Council Climate Action Plan 2024-2029 stated that based on the risk assessment, the most significant current climate risks in County Wexford are identified as: *River Flooding; Coastal Flooding; and Coastal Erosion.* Tacumshin to Kilmore Quay was additionally identified as an area prone to erosion in Chapter 12 of the Local Development Plan 2022-2028 (Coastal Zone Management and Marine Spatial Planning). The size and scale of the Resort may exacerbate this pressing issue of erosion. The planned coastal path which will garner more human activity may also add to this issue. The internal report from the Coastal Engineer states: *"It is noted from the Preliminary Coastal Erosion Assessment in consideration of the 0.1% AEP (1 in 1000 year) HEFS++ coastal flood scenario (i.e. 2.0m sea level rise), a minor area of the site adjacent to the south-eastern corner may be inundated"*. Which minor area will be inundated and will it have a knock on affect to any residential properties or nearby SPA sites? Could it lead to more minor or major inundated areas? Will it affect the Resort Complex in the future? In the 4.3.3 Site Specific Flood Risk Assessment it states: "*The Southern section of the site is liable to flooding from the Irish Sea in extreme scenarios."* As sea levels, coastal flooding and storm surges rise, this extreme scenario may be more likely to occur. We would worry that the construction phase and the operational phase of this development would add a strain to an already eroding coastline. The building of this resort does not line up with and is a contradiction of the Coastal Zone

and Maritime Area objectives currently in place, to *carefully* consider developments in identified high risk vulnerable coastal areas prone to erosion (WCDP 2022-2028).

10. Impacts on Wildlife/ Environment

Failte Ireland SEA ER of Wexford 2025 states: *Tourism based infrastructure can impact designated sites during both construction and operation. The development of the infrastructure required to increase visitor numbers and to promote outdoor activities linked to natural heritage areas could lead to the loss of habitat, including habitats that are Qualifying Interests of European Sites, and also habitats that support Qualifying Interest habitats and species. This can include habitats and species outside the Natura 2000 network, for example, areas used for feeding by wintering birds which lie outside the boundary of an SPA.* They also state in the same report: *Direct species mortality is possible as a result of site clearance, tree felling and vegetation removal as part of any infrastructure construction required to promote tourism • Disturbance can occur during construction and operation of infrastructure as a result of noise, both within and outside the footprint of the development. • Increased visitor numbers and/ or events can result in disturbance to wildlife. • Water quality impacts arising from both the construction and the operation of tourism infrastructure have the potential to directly and indirectly affect a wide range of habitats and species. • Accidental pollution events can result in sediment and pollutants entering sensitive watercourses resulting in a deterioration in water quality.* A recent European Environment Agency (EEA) report states that Ireland's natural environment is in a *very poor state*, with 85% of its protected habitats in unfavorable condition. Will this development add to these statistics?

We cannot see how a tourism resort of this size and scale, even with the planned mitigations, would not have adverse impacts on the current habitats and on the wildlife which depends on it to survive, which have previously lived here relatively undisturbed. This site is situated in between two SPA sites (Saltee Islands, Ballyteige Burrow, designated for their impressive bird population and ecological importance) and SAC (Forlorn Point). The surrounding water at the Bridge and Little Beach is also part of Saltee Islands SAC habitat. SPA Tacumshin Lake is also nearby and St Patricks Bridge recommended Geological NHA is adjacent to the site. Importantly, wildlife does not see the red lines of their designated areas or coastal buffer zones of where they can/ cannot go and regularly use other habitats as hinterlands.

This build, although taking biodiversity into account in its design i.e. including landscaped mounds to reflect the Ballyteige Burrow Dunes, is going against some of the WCC Development Plan and nation wide objectives by not protecting an existing thriving habitat. This build could affect many Habitat Directive or Bird Directive protected species present on and adjacent to the site such as grey seal, gannets, little egret, arctic tern, common tern, sandwich tern, little gull, mediterranean gull, dunlin,

otters. Threats from the Tourism Resort include light pollution, run off, dust pollution, noise pollution, human activity causing disturbance and change of behaviours in bird and other wildlife, displacement, habitat destruction, collision risks (see Department of Housing Local Government and Heritage report) and water contamination in the construction and operational phase. Fresh water springs are all along the foreshore; the birds and mammals use this for drinking and preening. These undocumented springs might be disrupted / corrupted by the build and foul water could make it back to groundwater and may bubble up affecting wildlife or the habitat. Another threat is that we have meadows of eelgrass which the brent geese come to feed on and is a nursery for marine life and any pollution could affect eelgrass irrevocably. Any and all new activity could affect these organisms. If built, it may also affect the Saltee Islands, as they will continue to be a unique selling point. This will bring more people to the site, already being over visited in the Summer months and could cause disturbance to colonies of birds. It may also affect SPA Ballyteige Burrow, where currently a local conservation group is working on a strategy on how to preserve and protect the dunes from coastal erosion and human activity.

The EIAR concluded that "if mitigation measures proposed are implemented and adhered to it is ***unlikely*** *that there will be significant adverse impacts to the area as a result of the proposed development and related activities"* and the Planners Report stated *"it is considered that subject to compliance with the following conditions, the proposed development would not* ***seriously*** *injure the amenity of the area.. Once the* ***recommended*** *measures outlined in the following sections are implemented in full, no* ***adverse*** *effects on the relevant European sites or their QIs/SCIs are* ***anticipated..*** *" "Where potentially significant effects were identified, a range of mitigation and avoidance measures have been* ***suggested*** *to avoid them..".* We need to be ***certain*** in order to build something that has the potential to affect so much wildlife. It cannot just be 'unlikely', 'recommended', 'anticipated' or 'suggested'. That is not good enough. How will we know due diligence is implemented and the mitigations suggested are followed? Do the threats remain the same if they are not?

We disagree with the decision that the development will not have adverse effects on the site, adjacent sites or on the wildlife and marine life. According to the *Department of Housing Local Government and Heritage,* the results in the reports conducted by DNV have not proven beyond scientific doubt that the development will not pose a threat to our biodiversity. The issue pointed out by the *Department of Housing Local Government and Heritage* was that DNV was conducting research for an insufficient amount of time. "*The winter bird surveys, which are the only source of recent bird data considered, were limited to six visits over a three-month period, within a single winter season, while the breeding survey period ran from April to June (three visits). It would have been expected that the full "winter" survey period covered in IWeBS would be used for this development, i.e., September to*

March, and that the post-breeding/autumn passage period (July to September) would have been considered in the survey design. This is a significant deficiency in the data.." and in addition they state some species have been *'overlooked'* or not accounted for. This is significant and should not be ignored. The precautionary principle was also used in these reports such as for lizards- but why was it not used for other species too? Even if there was no evidence of them or other species on those days when the survey was taken (ie the otter) does not mean they are not there or that if they have gone, that they cannot come back. For example, bird numbers in Ireland are dwindling with 63% of birds on the red, amber and green list. We need to ensure that there is a habitat still here for them for when they do, just like the lapwings and corncrakes have done in other parts of Ireland.

11. Alternative Uses for Land

The EIAR stated *"It is considered unlikely that any alternative process would result in less of an impact to the surrounding environment."* Smaller developments requiring less construction, time, waste, potential run off, light, people, trampling, pollution, litter, removal of green spaces would have less of an impact to the surrounding environment. Currently, there is no threat, there is farming land which has a symbiotic relationship with the land by providing a habitat for wildlife and growing and providing food and importantly is in keeping with its surroundings. With erosion, storms and sea levels all increasing, taking any green spaces/habitats/ hinterlands away, especially those in close proximity to EU protected areas will indeed impact the environment. No matter how many bird boxes or bio ponds there are it's still 800 plus people waste and disturbance, where before it was just agricultural land. It is still taking away an already thriving habitat to cater to tourism.

12. Anomalies

There have been a few inconsistencies in the application, reports and conditions. 1. The Chief Fire Officer was listed as a Consultee but has not responded as of the 26/10/2025. Permission was granted before plans were responded to by the Chief Fire Officer. 2. Similarly the Disability Access Officer wrote a one line response that DAC reports are needed for all buildings. Yet permission was still approved before these were received. 3.There is a discrepancy in one of the conditions which mentions a multi-story car park but there is no mention of this in any of the other plans. 4. Site notices are still up as of 23/10/2025, despite instructions to take them down immediately which all parties received. 5. The commissioned environmental impact assessment report carried out by DNV did not account for species such as lutra lutra (an otter) and were in the vicinity for an insufficient period of time (according to the Department of Housing Local Government and Heritage) approximately 13 days overall. 6.The AA and NIS report states 'All works carried out as part of the proposed Development will comply with the Statutory Legislation including the Local Government Acts, 1977

Comhairle Contae
Loch Garman

Comhaltas
Fleadh Cheoil
na hÉireann
2024 - 2025 Wexford

Wexford
County Council

4 September 2025

Andi McGarry & Lisa & Philippa Kinneen
The Moorings
Kilmore Quay
Wexford

ACKNOWLEDGEMENT OF RECEIPT OF SUBMISSION OR OBSERVATION ON A PLANNING APPLICATION

THIS IS AN IMPORTANT DOCUMENT

KEEP THIS DOCUMENT SAFELY. YOU WILL BE REQUIRED TO PRODUCE THIS ACKNOWLEDGEMENT TO AN BORD PLEANÁLA IF YOU WISH TO APPEAL THE DECISION OF THE PLANNING AUTHORITY. IT IS THE ONLY FORM OF EVIDENCE THAT WILL BE ACCEPTED BY AN BORD PLEANÁLA THAT A SUBMISSION OR OBSERVATION HAS BEEN MADE TO THE PLANNING AUTHORITY ON THE PLANNING APPLICATION.

PLANNING AUTHORITY NAME: **WEXFORD COUNTY COUNCIL**

PLANNING APPLICATION REF NO: **20250962W**

APPLICANT: **Robert Roche**

LOCATION: **Beak/Nemestown, Kilmore**

A submission/observation in writing has been received from **Andi McGarry & Lisa & Philippa Kinneen** on 4 September 2025 in relation to the above planning application which was received by the Planning Authority on 05-Aug-2025.

The appropriate fee of €20.00 has been paid.

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

WEXFORD COUNTY COUNCIL

pp. Emma Seaver.

Staff Officer
Planning and Development

Planning Authority Stamp

Comhairle Contae Loch Garman Wexford County Council
An Charraig Leathan, Loch Garman
Carricklawn, Wexford Y35 WY93
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and 1990 and the contractor will cooperate fully with the Environmental Section of *Fingal County Council* in this regard'(pg.91). This is an anomaly.

13. Planners Report

"The Planning Authority consider that a five year permission is more appropriate as this would enable future development on the lands if the tourist complex did not prove viable and would also avoid capacity in the WWTP been tied up for a lengthy period if the project fails to materialise". (p28) We would question how this build would be carried out safely, attentively and adhere to all conditions within five years instead of the initially requested ten years as planned. We would be interested in what said future development plans are if the project fails to materialise, which now seem more likely given the more appropriate period of time considered.

14. Mitigation Measures

Synergy DNV was commissioned to carry out an EIAR by the applicant. The DNV concluded no effects or environmental impacts would occur on the site or the adjacent protected sites if the suggested mitigations were followed. DNV have also stated in their EIAR that they are not liable for any consequences that could happen due to the results produced in their report. Who is liable in the event of an ecological casualty if DNV are not responsible for the consequences of the report results? In the decision makers statement, which centres around the environment, it states that there is sufficient information provided by DNV and concludes that there will be no adverse effects as long as mitigations are followed. The Department of Housing Local Government and Heritage, a Government Body whose goal is to conserve and manage Ireland's unique heritage for the benefit of present and future generations, as a support to economic renewal and sustainable employment and in compliance with legal obligations stated that they cannot exclude beyond scientific doubt that the development will not have an impact on EU sites. They state: *"In conclusion, this Department considers that it has not been proven beyond reasonable scientific doubt that the proposed development will not lead to adverse effects on the sites that have been assessed in the NIS....Therefore, the conclusion that the proposed development will not affect the integrity of any relevant European site is not supported by the current information provided."* The NIS states, in phase 1 before mitigations, that they cannot exclude that this development won't affect EU sites. But that if the mitigation measures are followed then the impacts are assumed not to happen.

However, in the conditions, condition number 6 it states that *The mitigation measures outlined in the Natura Impact Statement and the Environmental Impact Assessment Report dated 05/08/2025 shall be undertaken* ***except where otherwise agreed with the Planning Authority.*** Which mitigations do they mean? Which will be agreed not to be adhered to? If any of these mitigations suggested are not

adhered to the original threats and impacts remain very much there and may operate in that specific manner. This condition disregards the seriousness, the consequences and the overall point of mitigations completely. Every and all mitigations should be adhered to so as to prevent as much effect on the environment, wildlife and on people as possible.

15. Adherence to Local Development and Action Plans

This development does not align with many objectives in local plans. It is not adhering to many objectives in the Wexford County Development Plan 2022-2028 (*TM01, TM02 TV08, TV21, TV22, TM13, TM17*) and it is not adhering to many of the objectives in the Coastal Erosion Management within this plan. It is not adhering to many of the objectives in The Wexford County Council Climate Action Plan 2024-2029 or the objectives of Heritage 2030. It is not adhering to many commitments in all these local and national plans to protect habitats, rural communities, natural heritage and geological heritage, our wildlife or our built and cultural heritage for future generations. The decision appears to be ignoring these objectives but prioritising objectives that cater to tourism development. There needs to be consideration for small coastal communities who have already given so much of themselves to tourism.

Fáilte Ireland's own objectives regarding tourism in Wexford stated : "*Objective TM01: To protect and sustain the natural, built and cultural features that form the basis of the county's tourism industry including landscapes, historic buildings and structures, habitats, species and areas of natural heritage value and water quality. • Objective TM03: To facilitate the development of a sustainable diversified tourism industry at appropriate locations and at a* ***suitable scale****, subject to compliance with the objectives of this chapter and normal planning and environmental criteria. (Fáilte Ireland SEA Environmental Report 2025)."* This development is not a suitable scale nor compliant with these objectives and yet Fáilte Ireland approved this development. The Wexford County Council Climate Action Plan 2024-2029 (WCCCAP) Goal C states: *Protect and enhance the natural Environment in County Wexford to support biodiversity, mitigate against climate change and reduce the negative impacts of climate change. Objective: Wexford County Council will support and facilitate the protection, management, and enhancement of the natural environment of County Wexford.* This development is not in keeping with this objective and could potentially harm a habitat and other SPA, SAC, MPA protected areas adjacent to it.

Due to the reasons outlined above we respectfully ask that this decision to grant permission for the Integrated Tourism Complex is reviewed and reconsidered.

Signed,

Andi McGarry, Lisa Kinneen, Pippa Kinneen

Andi McGarry - Lisa Kinneen, Pippa Kinneen.

WEXFORD COUNTY COUNCIL
RECEIVED AT COUNTER
4 SEP 2025
PLANNING SECTION

The Moorings,

Kilmore Quay,

Wexford,

Ireland

28/08/2025

Re: Planning number 20250962W

10 year planning permission for development of an Integrated Tourism Resort Complex. Beak/Nemestown, Kilmore Quay Co Wexford.

To: Planning Department, Wexford County Council.

Dear Sir/Madam,

We wish to make observations on the above Planning Application. Please find enclosed the fee of €20.

We object to the application on the following grounds;

1.0 Impact on Landscape Integrity

1.1.) The Integrated Tourism Resort Complex will have a major impact on a Recommended Geological NHA, St Patrick's Bridge, a significant glacial moraine left from the ice ages and to the attached Little Beach, causing landscape degradation and impacting the integrity and character of the site due to the size and scale of the resort. This intrusive development is not sustainable or appropriate management of a Recommended Geological NHA, or of our vulnerable biodiversity depending on this habitat to survive. The Wexford County Development Plan 2022-2028 aims to protect and conserve our biodiversity of protected and unprotected species and our designated and undesignated heritage sites including geological sites and landscapes. We believe this development would actively contribute to habitat loss and degradation of the site and landscape integrity.

1.2.) This development is not respectful in the landscape's context of Nemestown, St Patrick's Bridge and The Little Beach which is an intimate and profound landscape, and the Tourism Resort Complex,

due to its size and the facilities offered, would affect the authenticity of this heritage site. It does not fit with any of the other surrounding perennial residential buildings in Nemestown or with Kilmore Quay's built heritage assets in the main village, namely the vernacular architecture- thatched cottages or St Peter's Church, or with the natural assets SPA, SAC designated Saltee Islands, SPA Ballyteige Burrow or SAC Forlorn Point.

1.3.) Kilmore Quay's LCU (landscape character unit) is a coastal landscape and an area with a high sensitivity to change and has a limited ability to absorb new developments, as stated in the WCDP 2022-2028. This resort is alien to a largely untouched landscape and skyline and would impinge on the uniformity of the area. According to Fáilte Ireland one of the main reasons tourists come to Ireland is *because* of these untouched landscapes. We should (according to and advised in the WCDP 2022-2028) be using and developing on existing structures instead of encouraging destruction of landscapes and habitats for significant developments in known and identified sensitive areas.

2.0 Erosion

2.1) The Tourism Resort Complex would be built on an area identified by the OPW as prone to erosion (Irish Coastal Protection Strategy Study, 2013). Various parts of the bankside from St Patrick's Bridge down to Kilmore Quay are susceptible to erosion. This build would exacerbate erosion as an increase in activity on shorelines is proven to contribute to erosion and disturb local ecosystems as noted from many academic studies.We would worry that the construction phase and the operational phase of this development would add a strain to an already eroding coastline. The building of this resort doesn't line up with the Coastal Zone and Maritime Area objectives (WCDP 2022-2028) currently in place, to *carefully* consider developments in identified high risk vulnerable coastal areas prone to erosion.

3.0 Threats to Wildlife

We cannot see how a resort of this size, even with the planned mitigations, would not have irreversible impacts on the adjacent habitats of marine life and wildlife, which have previously lived here

relatively undisturbed. Therefore, we are concerned with the results produced in the EIAR carried out by DNV.

This site is situated in between two SPA sites (Saltee Islands, Ballyteige Burrow designated for their impressive bird population and ecological importance) and SAC (Forlorn Point). The surrounding water at the Bridge and Little Beach is also part of Saltee Islands SAC habitat. NPWS (2014) stated: "*Many waterbirds may at times use habitats within the immediate hinterland of the SPA or in areas outside it but are ecologically connected to it. Significant habitat change or increased levels of disturbance within these areas could result in the displacement of one or more listed waterbird species from areas within the SPA and/or a reduction in their numbers*". Many species protected by the EU Habitats Directive from the Saltee Island habitat such as the gannet, cormorant and the grey seal can be found on/near St Patrick's Bridge and The Little Beach. The Brent Geese, which we have previously counted in flocks of 200, come to feed on the beds of seagrass. Seal pups get beached on the Little Beach in strong storms. Otters, another EU protected species, have been sighted on the bridge and the surrounding Little Beach many times in the past, which was notably unaccounted for and reported to show no evidence of in the EIAR. We and other members of the community have seen otters and cubs and have pictures of them fishing on St Patrick's Bridge. This brings into question if the EIAR/ NIS may have missed other important/ protected species/ impacts on the habitat.

Concerns for wildlife are as follows:

3.1.) Even with mitigations, we cannot see how dust pollution from construction for 36 months, which in the EIAR stated will be a high danger to wildlife in this duration, would not end up in the SAC protected waters or the reef, possibly harming the water quality or harming the marine life/ wildlife for example the birds, otters, or degrade beds of seagrass which are a food source for Brent Geese and nursery for countless marine life. How can we be assured there will be due diligence or that good practice will be monitored? Whose responsibility is it if an ecological disaster occurs?

3.2.) Even with mitigations, we cannot see how noise pollution from construction for 36 months will not discourage birds or other species from their habitat, alter their behaviour, or cause displacement in ecologically connected SPA or SAC areas.

3.3) The increase in human activity in the construction phase for the planned 36 months would surely cause degradation of the habitat and the increase of human presence/disturbance/litter in the operational phase would all cause stress on protected and unprotected birds, displace migratory water birds and other vulnerable wildlife like otters, destroying their quality of life.

3.4.) Even with mitigations, we cannot see how light pollution from the Resort would not affect the quality of life for nocturnal animals such as hedgehogs, otters, bats (three species of bat named in the EIAR) and wintering birds in the autumn and winter months when lights will be switched on earlier, altering their behaviours and/or causing displacement. Again, this particular part of Kilmore Quay has not had much development- the wildlife that depend on this habitat is not accustomed to lights, noise, dust, vibrations or copious amounts of people.

The Integrated Tourism Resort Complex could cause serious harm and pose a threat to wildlife and this habitat in the hinterland between the named SPA sites and to protected and unprotected species in a recommended geological natural heritage area and on the integral coastal habitat which one of the WCDP (2022-2028) objectives is to protect and conserve for future generations. We need to protect the habitats we still have, even though, for example, the bird numbers in Ireland are dwindling, so that when they return there's still a home for them here. There are biodiversity elements included in the plan but does it justify potentially permanently damaging an already thriving one? Once a heritage site is gone, we can never get it back. For these reasons we believe the Integrated Tourism Resort Complex should be approached and reviewed with grave consideration and impacts on this site be thoroughly assessed by the Council.

4.0 Concerns for Residents

4.1) Noise pollution for 36 months in the construction phase and light pollution in the construction and operational phase and dust in the construction phase will all grossly impact the residents in the area's quality of life for a prolonged period.

4.2.) The water and sewage in the area have already been under pressure as it is and the proposed development will place further strain on this system, especially with additions of a swimming pool, mini golf course, restaurants, among many other facilities all requiring these amenities. Will this

affect future planning permission for local residents who may need it for housing or other developments?

4.3) Like the water and sewage, there are at present struggles with parking, traffic congestion in peak seasons and a lack of footpaths which already have a negative effect on residents and visitors. The development and the influx of traffic it would bring would intensify these issues. Traffic congestion from the site in the operational phase going through the R739 could cause disruptions to locals' daily lives and pose a danger to life. Traffic congestion in the operational phase on small roads which were not built for this influx would be dangerous, especially with an increase in cyclists and pedestrians (as the plan proposes) namely traffic on the R739 and the L0368. In addition, there may be a strain or delay on emergency services due to construction traffic/ congestion in the construction and operational phases.

4.4.) Tourism can bring economic benefits to an area and improve the quality of life for residents but this resort may have the reverse effect and reduce the quality of life for residents and businesses and could increase the cost of living. With this significant addition, Kilmore Quay may struggle with overtourism and turn into a tourist attraction as opposed to a place to live. Tourists may outnumber the residents (447 per 2022 census and an estimated influx of over 800 resort guests and additional staff, if the resort is successful, along with all the usual seasonal visitors). As visitor numbers increase, so does the demand for resources, water, waste management and energy, and this can exceed available resources. This can lead to increased prices, shortages, loss of identity and displacement of communities due to the prioritisation of tourists demands. The profits may only benefit large corporations who operate the Tourism Resort Complex. The guests may just as easily stay within the confines of the resort, and locals and businesses become left out of the visitor economy and benefits that the resort provides. The development regardless if it's a success or failure may impact the charm, untouched landscapes and affect the star quality of the heritage village, (previously called "the jewel in the crown of South Wexford") the very reasons why valued visitors have been returning for years time and time again.

4.5.) Mental distress to local residents seeing a place of outstanding universal value, natural heritage, authenticity and meaning being degraded, devalued and destroyed, and the socio-cultural implications on the community, the face and feel of the heritage village being changed permanently.

Summary

This particular development is unsuitable for this area. It is adding an estimate of over 800 people to a part of Kilmore Parish (Nemestown) that has never witnessed this level of tourism before.
Kilmore Quay and Nemestown, its people, its heritage, its flora and fauna don't just exist for tourism and this needs to be accounted for and recognised so that it is not a village entirely dependent on tourism or developed and sanitised solely for tourists benefit and experiences. There needs to be protection for places that have a sense of geopiety to local people from developments like the proposed Integrated Tourism Resort Complex.

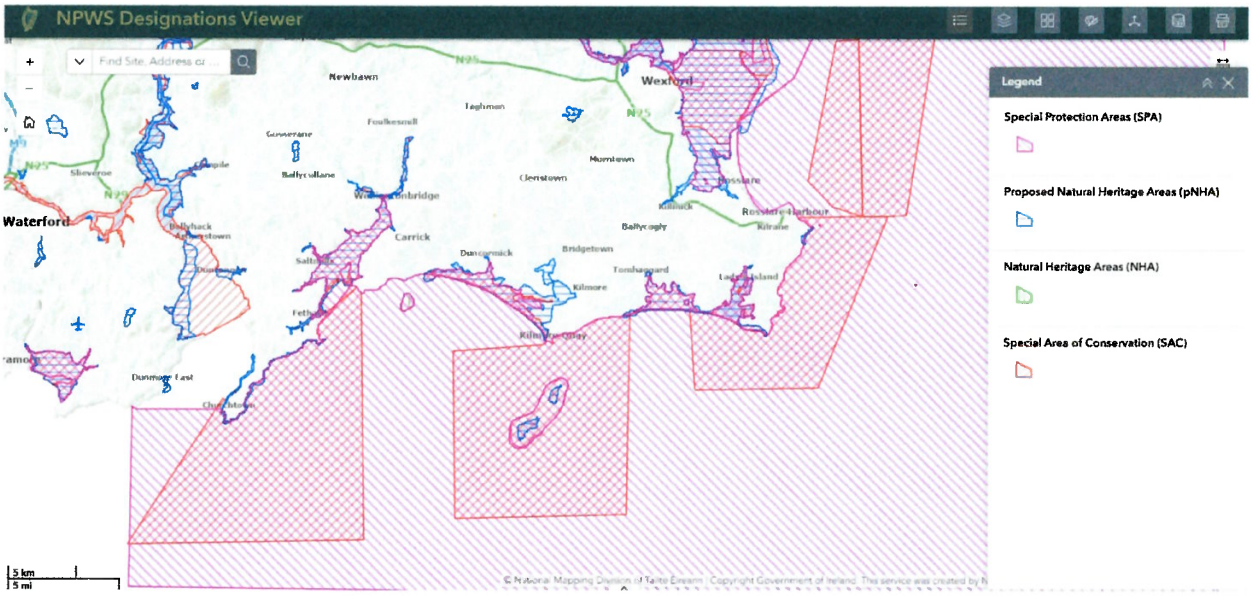
Best wishes,

Andi McGarry, Lisa Kinneen, Philippa Kinneen

Andi McGarry Lisa Kinneen Philippa Kinneen.

Supporting Documents

1. *SPA and SAC boundaries around the site.*



2. *Little Beach on a Summer day*



3. *Warning sign on Burrow Beach*



4. *Site notice still up on the 23rd of October.*



5. *Crumbling bank at the site*



6. *Eelgrass washed ashore*



7. *Sightings of lutra lutra (otters) from various residents who live adjacent to the site and otter sightings at the bridge*









8. *Birdlife at the bridge and Beak field that the development might impact (photos taken on site)*































9. *Some marine life at the reef that the development might impact. (Photos taken on site)*

















10. *Example of Blowout on Burrow Dunes due to coastal erosion and human activity on SPA Ballyteige Burrow Dunes*

