3rd Party Appeal

Correspondence Coversheet

SCANNED

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	Brendan O'Flaherty	30/10/2025	Valid	No

Issue	Participant	Representative
BP01M — English	Brendan O'Flaherty	—

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 JM
Lauren Simone Murphy, Administrative Assistant

Date 6/11/25

Correspondence Coversheet

Payment ID: **FEE-PAY-000239**

An Coimisiún Pleanála

Section:	Processing
PA Name:	Wexford County Council

Submission Reference:	20250962W

Date:	30/10/2025
Name:	Brendan O'Flatherty
Total:	€220.00 ✓

Attachments/Comment:	—

Created By:	Pádraic Keane
Channel:	Registered Post

Multiple 2

DOD: 6/10/25

LID: 3/11/25 ✓

Ack ✓

Name + address ✓

Comhairle Contae
Loch Garman

Comhaltas
Fleadh Cheoil
na hÉireann
2024 - 2025 Wexford

Wexford
County Council

11 September 2025

AN COIMISIÚN PLEANÁLA
LDG- Fee-Pay - 000239
ACP-
30 OCT 2025
Fee: € 20 Type: EG
Time: 9:57 By: Rapid

Brendan O'Flaherty
Four Winds
Kilmore Quay
Co. 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 **Brendan O'Flaherty** on 08-Sep-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

"Four Winds"
Kilmore Quay
Co. Wexford

Ph: 086-8139923

27/10/2025

Re: Appeal against granting of Planning No. 20250962W at Beak & Neamestown, Kilmore Quay, Co. Wexford (Developer: Robert Roche) by Wexford County Council.

Dear Sir/Madam,

I wish to lodge an appeal against the granting of the above planning application. Therefore, please find attached:

- Appeal details
- Acknowledgement of Submission Letter from Wexford County Council.
- Necessary fee of €220.

I make my appeal under the following headings (detailed further in the accompanying document):

1) Appropriate Assessment & Natura Impact Statement (NIS)
2) Environmental Impact Assessment Report (EIAR)
3) Ecological Report
4) Bat Surveys
5) Bird Surveys
6) Flora & Fauna
7) Treelines, Hedgerow & Water Pooling
8) Wastewater Connection
9) Coastal Erosion
10) Car Dependency
11) Landowner Consent
12) Management & Operation
13) Planner's EIA Report
14) Unnamed Watercourse
15) Photomontages
16) Not in Keeping with Area & Scale
17) Overlooking/Loss of Privacy
18) Archaeological Report
19) County Geological Report
20) Lack of Social Infrastructure
21) Masterplan
22) Pedestrian Safety
23) Presentation of Reports

Grounds for Appeal against planning No. 20250962W - Tourism Resort Complex at Beak and Nemestown, Kilmore Quay, Co. Wexford compiled by Paula E. Redmond (Adv Dip Planning & Environmental Law, King's Inns, MSc, HDip, BEng Civil Engineering, MIEI).

1) Appropriate Assessment & Natura Impact Statement (NIS)

In their letter dated September 25th 2025 to Wexford County Council, The Department of Housing, Local Government & Heritage state that *the information contained in the NIS is insufficient to support the conclusion that the proposed development will not adversely affect the integrity of any relevant European site.* They also highlight severe discrepancies between the status of birds listed in the AA screening report and the official status in 2017 Article 17 Report 1 and Birds of Conservation Concern in Ireland 2. They state

Nature Conservation

Appropriate Assessment

There are significant concerns in relation to both the accuracy of the baseline information included in the Natura Impact Statement (NIS), which forms part of the basis for the Appropriate Assessment (AA), and also in relation to the completeness of the AA. This Department considers therefore that the information contained in the NIS is insufficient to support the conclusion that the proposed development will not adversely affect the integrity of any relevant European site

It should be noted at the outset that the conservation status of qualifying interest (QI) species and habitats and special conservation interest (SCI) Birds, as listed in the AA screening, in almost all cases does not correspond to the status in either the 2017 Article 17 Report1 (although this has been cited as the source for the species and habitats conservation status) or the Birds of Conservation Concern in Ireland2 listings (which have been referenced elsewhere in the NIS). Sources for the local bird population data on which the AA is based appear to be limited to Site Synopses and the recent breeding/winter bird surveys carried out for the proposed development. IWeBS (Irish Wetland Bird Survey) data does not appear to have been consulted. The Ballyteigue Burrow Conservation Objectives Supporting Document3 , although cited in the NIS, does not appear to have been taken into account in assessing the significance of bird usage of the site. For example, there is an apparent

contradiction between the "Good" conservation status of Lapwing in the AA screening, and its classification as Highly Unfavourable – Declining in the Conservation Objectives Supporting Document, as well as its Red listing in Birds of Conservation Concern in Ireland

Please note that the conservation status of the Lapwing is noted as "good" in *5.1.6 Qualifying Interests and Conservation Objectives* of the *Appropriate Assessment (AA) Screening & Natura Impact Statement (NIS) Report.*

Please see Appendix A, relevant extract of letter from the Dept. of Housing, Local Government & Heritage attached.

The above is a severe lacuna in the NIS.

TABLE 8. ASSESSMENT OF THE POTENTIAL IMPACT OF THE PROPOSED DEVELOPMENT ON THE QIS AND SCIS OF THE RELEVANT EUROPEAN SITES. THOSE QIS/SCIS FOR WHICH NOTABLE IMPACT PATHWAYS WERE IDENTIFIED HAVE BEEN HIGHLIGHTED IN GREEN states the number of breeding pairs of various QIS birds on the Saltee Islands SPA. The NIS does not state the source for the figures of breeding birds. I assert that some of these figures may be inaccurate. For example, it states that that there are 73 pairs of breeding herring gulls on the Saltee Islands. However, there were 115 pairs recorded on Saltee Island Great alone in the 2015-2018 period – the most up to date figures I could source - please see Appendix C attached.

5.3.4.5 *Mitigation 5: Acoustic and Visual Barriers* of the NIS states

Noise levels at the Site in conjunction with wintering waterbirds present in along the shoreline will be monitored regularly by a suitably qualified ornithologist to ensure the effectiveness of the acoustic barriers (see section 5.3.4.1).

I assert that the above is too vague. No details are given as to what level of noise is deemed acceptable – what is the point of monitoring if there is no reference given for acceptable/unacceptable levels? In addition, no details are given as to what the aforementioned ornithologist will use as a baseline for monitoring of wintering bird numbers.

Also, no details are given of what steps are to be taken if the noise levels are too high or wintering birds appear to be impacted.

5.3.4.9 *Mitigation 9: Removal of Invasive Flora* refers to herbicide as a method of removal for Montbretia and that physical removal is difficult. I assert that insufficient detail has been given in relation to how the invasive species will be treated. If herbicide is to be used, what sort of herbicide will be applied? This is particularly relevant given that at the narrowest point the subject site is located just 14m from a SAC and SPA.

4.3.2.1 *Hydrological Pathways* of the NIS states

Direct Pathways

The Site is located on the coast of the Irish Sea and lies directly adjacent to Saltee Islands SAC (000707) and Seas off Wexford SPA (004237), separated by a distance of approximately 14m at the closest point.

Certain activities are prohibited except under licence in SPAs. *S.I. No. 300/2019 - European Union Habitats (Saltee Islands Special Area Of Conservation 00707) Regulations 2019* states in relation to prohibited activities

ARC 18 *Application of pesticides, including herbicides. [Consent is not required for these activities on established reseeded grassland or cultivated land provided it is greater than 20m from a river, stream or floodplain; or greater than 50m from a wetland, lake, turlough or pond.]*

It must be noted that in addition to the proposed sites proximity to the Saltee Islands SAC, there is also an existing pond onsite and unmapped stream which discharges directly to the sea.

2.12 Proposed Foul Water Drainage of the *Civil Engineering Planning Report* states

An extensive engagement process was undertaken between DRA Consulting and the Uisce Éireann CDS Team to agree the wastewater loading from the proposed development and following this process, a Confirmation of Feasibility (COF) was issued on 29/04/25. This COF confirmed that the connection, up to the said maximum reserve capacity was feasible, subject to the upgrade of the Kilmore Quay WWTP to the Phase 2 design horizon (planning reference 2019/1633). A copy of the Confirmation of Feasibility is contained in Appendix E for reference. The upgrade works are required to be funded by the developer and Robert Roche has discussed and agreed this requirement with Uisce Éireann.

Irish Water were granted a ten year planning permission in 2020 (planning no. 20191633 applies) for

PERMISSION TO CONSTRUCT A NEW WASTEWATER TREATMENT PLANT IN KILMORE QUAY IN TWO PHASES. PHASE 1 (A) WASTEWATER TREATMENT PLANT (WwTP) WITH A CAPACITY OF 850 POPULATION EQUIVALENT (PE) AT NEMESTOWN; (B) 2 NO. WASTEWATER PUMPING STATIONS (WwPS) AT CROSSFARNOGUE; (C) 8.5 KMS OF PIPELINE IRISH WATER INTENDS TO DELIVER THIS PHASE WITHIN 5 YEARS. PHASE 2 CONSTRUCTION OF MODULAR EXPANSION OF THE WwTP TO PROVIDE A TREATMENT CAPACITY UP TO 1,900PE.

1.3.2.2 Foul Drainage of the EIS states

During the Operational Phase, foul water from the Site will be connected to the Kilmore Quay Wastewater Treatment Plant (WwTP) located to the east of the Site. All foul water will be pumped to the Kilmore Quay WwTP for treatment, prior to discharge in the East Irish Sea to the south. The Kilmore Quay WwTP was completed in 2023 (prior to the commencement of works on the Proposed Development) and can now serve a Population Equivalent (P.E.) of 850. The current summer P.E. is noted as being approximately 652 P.E. within the NIS submitted as part of the application for the Kilmore Quay WwTP. Future connection to this WwTP has been agreed with Irish Water by the applicant and a Confirmation of Feasibility was issued by Irish Water on the 29th of April 2025.

As can be seen from the above, the current full capacity of the WwTP is almost met during summer months.

An Taisce stated in its letter to Wexford County Council dated September 8th 2025

4. Wastewater Treatment

It is submitted that the capacity of the local wastewater treatment plant (WWTP), currently under construction, must be able to accommodate the increased volumes of wastewater arising from the proposal. This would minimise adverse environmental impacts from foul water run-off during the operational phase of the proposal. We note that Uisce Éireann has already agreed to facilitate the connection to the WWTP. The applicant notes that the WWTP will have the potential for future expansion. The WWTP must be able to accommodate the maximum possible load from the proposed development at the originally planned capacity and not be reliant on future expansions.

2.13 *Water Supply* of the *Civil Engineering Planning Report* states

Priority Geotechnical Ltd. have undertaken extensive testing on the existing well on site to determine if there is sufficient stable supply available to support the development. The testing included the construction of 3 Nr. monitoring wells, various pump tests and water quality sampling. Assessment of this data by DNV has indicated that there is a stable supply available, which is capable of supplying the average daily demand of the development. Water quality samples were also assessed for potability. The results for samples collected at the pumping well (baseline and during pumping) meet the applicable drinking water parametric values for the parameters analysed. Details of the testing and analysis are included in the Hydrological Assessment Report by DNV.

It is therefore proposed that the development will be served by 2 Nr. groundwater wells with a supplementary back-up mains supply from Uisce Eireann feeding into a drop tank to prevent backflow into the mains water system. 24-hour water storage will be provided on site.

A Pre-Connection Enquiry was submitted to Uisce Éireann on the 01/11/24 showing a proposed connection to the existing water mains in the R739. The pre-connection enquiry sought a connection from Uisce Éireann to supply the full water demand for the development (assuming failure of pump system). An extensive engagement process was undertaken with the Uisce Eireann CDS Team and a Confirmation of Feasibility (COF) was received from Uisce Éireann on 29/04/25. This COF confirmed that the connection to the existing

watermain was feasible subject to 1.6km of water network upgrades being undertaken which must be funded by the developer.

The 1.6Km of water network upgrades do not appear to have been included in the AA and EIS report. As they appear essential for the development, I assert that this is a severe lacuna in the AA & EIS. I assert that this could constitute "project splitting".

In addition, *5.3 Groundwater Levels* of the *Hydrological Assessment Report* submitted as part of the planning application states

Groundwater levels were recorded by PGL at the wells during pre-pumping conditions (baseline conditions) on the 7th and 16th of October 2024, post-pumping conditions on the 21st of October 2024 and during the hydrogeological tests (i.e. step test and pumping tests) undertaken.

6. *Conclusion* of the *Hydrological Assessment Report* states

The test results are considered representative of site conditions at the time of testing. However, the potential for seasonal variations in groundwater quality and capacity cannot be discounted and should be considered in future infrastructure planning.

The tests were carried out in October 2024. Highest demand for water in Kilmore Quay would be in the summer months due to tourists in the area. This is also the driest part of the year. I therefore assert that testing at a drier time of the year than October would give a more accurate indication of whether the proposed wells can cater for the proposed development.

Details of the proposed acoustic barrier, such as type of barrier, proposed location etc. are not included in the NIS. This is a severe lacuna in the NIS. This issue was raised by the Department of Housing, Local Government & Heritage in their letter dated September 25th 2025 to Wexford County Council in relation to *Disturbance to Qualifying Interest species and habitats Species with high and medium sensitivity to disturbance* which have been recorded on or adjacent to the proposed site.

Disturbance to Qualifying Interest species and habitats Species with high and medium sensitivity to disturbance, including Bar-tailed Godwit (SCI for Ballyteigue Burrow Special Protection Area (SPA) (Site Code: 004020); disturbance distance up to 300m5) have been recorded on or adjacent to the site. The proposed mitigation for the construction stage is an acoustic barrier, but no specifications or other details are provided, other than that such barriers are available online. A specific description of the barrier that will be used, and where it will be located, should be included in the NIS.

The above issues are compounded by the fact that there is potential for significant effects from noise and visual disturbance to qualifying species of Ballyteige Burrow SPA.

4.4.4 Disturbance and / or Displacement of Species
4.4.4.1 Construction Phase of the NIS states

Taking the above into consideration and adopting the precautionary principle, ***there is the potential for noise and visual disturbance during Construction leading to significant effects on some of the waterbird species of Ballyteige Burrow SPA.***

It must be noted that according to the *Appropriate Assessment (AA) Screening & Natura Impact Statement (NIS) Report* two SCI species of nearby SPAs were recorded on the proposed development site.

4.4.4.2 Operational Phase of the NIS states

Ballyteige Burrow SPA – Noise & Visual Disturbance states
During Operation, there is the potential for disturbance to species as a result of increased human presence, particularly given the proposed path connecting the Proposed Development with the nearby Kilmore Quay village, located northwest of Ballyteige Burrow SPA which is designated for waterbird species that forage in the wetland habitats (670m west of the Site). In order to assess the potential for significant effects, the Waterbird Disturbance Toolkit is referred to (Cutts et al, 2013), which contains information on the noise and visual disturbance on different waterbirds caused by walkers along the beaches. As shown in Figure 9 above, walkers using flats may constitute a 'High' disturbance activity in terms of visual disturbance, although noise disturbance will be low. As such, visual disturbance is the focus

of the assessment of potential for significant effects on SCI bird species, illustrated below in Figure 10 extracted from Cutts et al (2013).

As per Lewis et al (2019), "Disturbance from humans walking with/without dogs is consistently found to the most disturbing activity at sites during assessments undertaken for SPA conservation objectives". However, it is worth noting that during the most sensitive time for wintering bird species, which, broadly speaking, runs from October to February, inclusive, will also coincide with times that beaches are used less frequently by walkers due to weather conditions. This is confirmed within the Conservation Objectives Supporting Document (NPWS, 2014c) "Human recreational activities at coastal sites occur less frequently during winter months and the range of activities is much reduced". Furthermore, this document continues, "recreational activities across the site are limited because of the site's relative inaccessibility". As a result of the above and given the large variety of alternative beaches in Wexford and available within the vicinity of the Proposed Development, there is no potential for significant effects on the SCI waterbird species for which Ballyteige Burrow SPA is designated.

The above paragraph is misleading and not reflective of the details in *Ballyteige Burrow Special Protection Area (Site Code 4020), Conservation Objectives Supporting Document* (May 2014) produced by the National Parks & Wildlife Service (NPWS). As can be seen from the relevant extract below, it does say that the site is "relatively inaccessible". This is due to the fact that the main access points are in Kilmore Quay and Cullenstown. The population of Kilmore Quay is relatively low (population of 447[1]), so the only persons accessing at the Kilmore Quay location would be locals or tourists. If the proposed development is built there will be hundreds of additional people in the area who potentially will access Ballyteige Burrow.

With regards to winter months, the extract below clearly states *while in the winter the coast is popular for recreational walking.* Again, the additional persons that the proposed development will bring to the area will result in potentially large number of persons accessing Ballyteige Burrow.

[1] Central Statistics Office (CSO). Census 2022. Available: https://visual.cso.ie/?body=entity/censusurbanprofiles

Relevant extract from *Ballyteige Burrow Special Protection Area (Site Code 4020), Conservation Objectives Supporting Document* Version 1 (May 2014)[2]

5.4.3 Overview of activities at Ballyteige Burrow

Recreational Disturbance

Recreational disturbance In general, recreational activities across the site are limited because of the site's relative inaccessibility. The main access points to the shore are at Kilmore Quay and Cullenstown and in the summer season both locals and tourists use accessible areas of the coastal strip for walking, swimming and beach recreation, while in the winter the coast is popular for recreational walking. Due to the shelved nature of the coastline, swimming in this area is dangerous (NPWS, 2000).

The popularity of Ballyteige Burrow for walkers in the winter is noted in *Ballyteige Burrow Special Protection Area (Site Code 4020), Conservation Objectives Supporting Document* Version 1 (May 2014). It states in *5.4.5 Discussion*

Human recreational activities at coastal sites occur less frequently during winter months and the range of activities is much reduced. At Ballyteige Burrow, despite its relative inaccessibility, recreational walking is still noted to be a popular and regular activity within several subsites.

I assert that the increase in tourists/walkers that could be brought to Ballyteige SPA could potentially lead to negative effects on the SPA such as disturbance to birds etc. As noted in the extract from the EIS above *Disturbance from humans walking with/without dogs is consistently found to the most disturbing activity at sites during assessments undertaken for SPA conservation objectives.*

Ballyteige Burrow Special Protection Area (Site Code 4020), Conservation Objectives Supporting Document Version 1 (May 2014) also states

...The above points also highlight the complex nature of waterbird behaviour and species specificity, as well as the need for careful consideration of the impacts of disturbance upon waterbird species when undertaking Appropriate Assessments or other environmental assessments. This review could therefore form the starting point for any future study aiming

[2] National Parks & Wildlife Service (NPWS). (2025). Available: https://www.npws.ie/sites/default/files/publications/pdf/Ballyteige%20Burrow%20SPA%20(004020)%20Conservation%20objectives%20supporting%20document%20-%20[Version%201].pdf

to quantify the effects of activities/disturbance events across the site, as well as to help identify the extent to which existing use and management of the site are consistent with the achievement of the conservation objectives described in Part Three of this document.

If the proposed development is granted, there will be a significant increase in visitors to Ballyteige Burrow. This is compounded by other issues caused by the development that will potentially impact bird activity, such as noise, height of development (leading to possible collisions from birds) etc.

It must be noted that Ballyteige Burrow contains numbers of certain species of national and international importance.

As stated in *1.2 Introduction to Ballyteige Burrow Special Protection Area* of *Ballyteige Burrow Special Protection Area (Site Code 4020), Conservation Objectives Supporting Document* Version 1 (May 2014)

The site supports non-breeding (wintering) Lightbellied Brent Goose and Black-tailed Godwit in numbers of international importance plus a further five waterbird species in numbers of all-Ireland importance.

Ballyteige Burrow Special Protection Area (Site Code 4020), Conservation Objectives Supporting Document Version 1 (May 2014) also highlights how the significance of even short-term displacement of birds should not be underestimated. It states in *5.4.5 Discussion*

Any activity that causes disturbance can lead to the displacement of waterbirds. The significance of the impact that results from even a short-term displacement should not be underestimated. In terms of foraging habitat, displacement from feeding opportunities not only reduces a bird's energy intake but also leads to an increase in energy expenditure as a result of the energetic costs of flying to an alternative foraging area. Displacement also has knock-on ecological effects such as increased competition (within and/or between different species) for a common food source. In areas subject to heavy or on-going disturbance, waterbirds may be disturbed so frequently that their displacement is equivalent to habitat loss. When disturbance effects reduce species fitness17 (reduced survival or reproductive success) consequences at population level may result.

5.2.1 *Potential Impacts of the Proposed Development* of the NIS states an "estimated" construction phase duration of 2 years. I assert that the phase may be longer. However, even

if 2 years is correct, this is a significant time for potential negative impact on the surrounding SACs and SPAs.

I assert that granting the proposed development, given the various issues outlined above, would be contrary to Objective NH04 of the *Wexford County Development Plan* 2022-2028 which states

To protect the integrity of sites designated for their habitat and species importance and prohibit development which would damage or threaten the integrity of these sites. Such sites include Special Areas of Conservation (SACs) and candidate SACs, Special Protection Areas (SPAs), Natural Heritage Areas(NHAs) and proposed NHAs, Nature Reserves, Refuges for Fauna and RAMSAR sites. To protect protected species wherever they occur.

In addition to possible problems in relation to correct baseline details in relation to birc species and numbers on the subject site. I assert that the NIS fails to adequately discuss how the baseline scenario would evolve without the proposed development, as required by Schedule 6 Paragrah 1of the *Planning & Development Regulations*, 2001.

4.2.2 Relevant Field Survey results of the NIS also states

There are areas where water is pooling along the southern bounds of the Site, indicated on Figure 5. A number of SCI wintering bird species were observed utilising these areas, which overlap entirely with the 100m coastal buffer zone.

The above implies that due to the "buffer" zone, that the areas where water is pooling will remain for birds to "utilise" following development. However, as can be seen from *FIGURE 4. PROPOSED LANDSCAPE PLAN FOR THE SITE EXTRACTED FROM DHLA (2025)* that two new attenuation ponds are proposed along the south western boundary of the development site, a substantial distance from where the water is currently pooling. Thus, the water currently pooling in the areas described above will runoff into these new attenuation ponds. The new ponds are not located in the 100m "buffer" zone. Again, as noted above, it is proposed to include walkways in the so called "buffer" zone, therefore it will not act as an untouched/unused buffer. Not only will it undergo development (of the proposed paths) if the proposed development is built but it will be used by guests of the hotel.

4.3.2.2 Hydrogeological pathways of the NIS states that there is potential for pollutants to migrate via the bedrock to the Saltee Islands SAC and Seas of Wexford SPA. It sites the proposed 100m "buffer" zone as a method of offsetting this risk stating that the "buffer" zone will be undeveloped. However, pathways are proposed in the "buffer zone". Please see relevant extract below.

4.3.2.2 Hydrogeological pathways
Generally, groundwater flows towards the coast within a groundwater body. During groundworks and other construction activities, the ground will be exposed. Although unlikely, accidental discharges to ground could potentially migrate vertically downward to the underlying bedrock aquifer and laterally within the aquifer to the downgradient ***Saltee Islands SAC (000707)*** *and* ***Seas off Wexford SPA (004237)****, given the close proximity (c. 14m). However, as a component of the design of the Proposed Development, a 100m coastal buffer will be left undeveloped along the southern bounds of the Site – with a small walking path being the only feature included within the buffer zone.*

4.3.2.3 Air pathways states that *Due to the nature and localised scale of the proposed works,* air emissions will be limited *to brief to temporary dust generation within 25m of the Site.* The proposed site is located 14m from Saltee Islands SAC (000707) and Seas off Wexford SPA (004237), at their closest point. Therefore, within 25m. However, the NIS argues that the distance will be further due to the proposed 100m "buffer" zone. However, development of pathways within the "buffer" zone is proposed. Obviously, any sort of excavation will cause dust. Therefore, I assert that there is the potential for dust to impact Saltee Islands SAC (000707) and Seas off Wexford SPA (004237). Please see relevant extract of the NIS below.

4.3.2.3 Air pathways
Direct pathways
The Construction Phase of the Proposed Development could introduce dust and noise impacts transferable via air pathways, spread of invasive flora, as well as increased lighting and human activity at the Site and in the vicinity of the Site during the Construction and Operational Phases.
Dust

The Site is located on the coast of the Irish Sea, 14m from Saltee Islands SAC (000707) and Seas off Wexford SPA (004237), at their closest point. Due to the nature and localised scale of the proposed works, which will limit air emissions to brief to temporary dust generation within 25m of the Site (based on TII assessment criteria for moderate sized construction sites) and emissions from construction machinery and vehicles (NRA, 2011), and given the size of the Proposed Development Site, dust generation and deposition during construction has the potential to degrade habitats within 25m of the proposed development site (NRA, 2011). However, as a component of the design of the Proposed Development, a 100m coastal buffer is to be left undeveloped along the southern bounds of the Site, which will intervene any dust generated at the Site; as such no dust-related impacts are anticipated to affect Saltee Islands SAC or Seas off Wexford SPA

4.3.2.3 Air pathways states under *Indirect Pathways*

Collision Risk
Additionally, the construction of multi-storey buildings in the form of a three-storey and potentially a four-storey building may lead to increased flight line obstruction/bird collisions in an area where previously no structures existed, affecting Ballyteige Burrow SPA (004020), Seas off Wexford SPA (004237) and Saltee Islands SPA (00004002).

I assert that the NIS should be based on factual details in relation to the proposed development and that the insertion of *potentially* above is not acceptable.

4.4.6.2 Likelihood of Collision Impacts of the NIS states

As there were no large flocks comprising SCI bird species of Ballyteige Burrow SPA, (largest no. of birds at one time comprised eight individual redshanks on the 19th of November 2024), the likelihood of collisions of significance impacting upon the SCI bird species for which Ballyteige Burrow SPA is designated is low.

As can be seen from the above, collision risk is not ruled out, instead the NIS argues that if they do occur that they will not be significant on the SCI bird species for which Ballyteige Burrow SPA is designated. I assert that the construction of buildings of the scale proposed in such an environmentally sensitive area, on a site that is obviously utilised by numerous red

and amber listed birds, including those which are qualifying interests of the nearby SPAs is unacceptable.

4.4.6.1 Collision Risk of the NIS states

Of the SCI birds for which Ballyteige Burrow SPA is designated, only blackheaded gulls were observed flying over the Site. Black-headed gulls were recorded using the Site during five of the six surveys…

TABLE 5-13. BIRDS RECORDED AT THE SITE DURING THE PRELIMINARY WALKOVER SURVEY IN DECEMBER 2023 states that Black-headed gull (*Chroicocephalus ridibundus)* roosting in a group of 100-200 birds was observed in a field directly east of the subject site. This is evidence that large flocks of Black headed gulls fly in the area. This would appear to contradict the assertion in *4.4.6.2 Likelihood of Collision Impacts* of the NIS that the likelihood of significant collisions is low.

4.4.6.3 Building Height of the NIS states

The Proposed Development entails the construction of a hotel development of up to 4 storeys and as such, the risk of migrating birds colliding with the structure due to its height is deemed to be negligible (Migrating species tend to commute far above this with Swans and Geese flying up to 2500ft (ca.750m) during migration along Irish Coasts (Irish Aviation Authority, 2020). Birds that fly over the Site to commute between feeding grounds at various locations would fly lower than this, however, once the proposed structures are made of visible materials i.e., not entirely comprised of reflective materials such as glass, the birds would simply fly around or over them.

I assert that the statement above that birds flying between feeding grounds would *simply fly around or over* the proposed development is nonsense. I assert that due to the scale of the building, not only in terms of height but length, and the location of the hotel building on the site (the closest proposed building to the sea), that the proposed development is likely to disturb bird flight paths.

4.4.8 Potential for In-combination Effects of the NIS only considers developments within 1km of the site. Thus, the only development it considers is the recently completed WwTP adjacent to the development site. As discussed in Point 2: Environmental Impact Assessment Report (EIAR) below, I also assert that the "In-combination review" of the EIAR is

inadequate, however, even that includes two additional developments. As discussed further in that section I highlight the omission of other very relevant developments in the locality. Many of the other developments in the local area are significant developments requiring and NIS. I assert that the use of only developments within 1Km of the proposed development is a severe lacuna in the NIS.

5.3.4.5 Mitigation 5: Acoustic and Visual Barriers of the NIS states

- *Acoustic barriers should be installed along the entire length of the southern boundary of the area for development, throughout the duration of the Construction Phase and until Operational Phaseearthen berms and supplementary planting becomes established / effective. Acoustic barriers are readily available online and have the benefit of reducing noise levels by up to 43dB1.*

- *Acoustic barriers should be opaque so as to additionally reduce visual disturbance. As per Cutts et al (2013), the removal of the majority of visual stimuli in combination with the reduction in noise levels will decrease overall disturbance to waterbirds that may be using the shoreline to 'Low level disturbance'. This is defined as "Works that are out of sight of birds and create a low-level noise" at the bird, both of which will be achieved by the installation of the opaque acoustic barriers.*

As discussed earlier, I assert that the type of acoustic barrier required should be stated. Without knowing the exact type to be used, how is one to know what level of noise reduction it can provide? The above states that barriers are available to reduce noise *by up to 43dB1.* This would imply that the maximum possible reduction achievable with use of the barriers is *43dB1.* Given the stated potential for negative effects on the adjoining SPAs and SACs, surely the required barrier should be stated.

Given that birds can fly above the subject site, I assert that it is impossible to have works that are *out of sight of birds.* I assert therefore that the mitigation measures proposed in relation to acoustic and visual issues are entirely inadequate.

5.3.4.6 Mitigation 6: SCI bird-friendly Construction Phase Lighting states

Construction work will generally be confined to daylight hours and lightning will generally not be required for the Construction Phase. There will however be occasions where the

provision of portable lighting may be required. Where possible, the Construction Phase lighting will be switched off during non-working hours.

The above implies that not only may artificial light be required but it may be left on all night.

Condition No. 4 of the grant of permission states

Prior to commencement of development, a revised Construction Management Plan shall be submitted for the written agreement of the Planning Authority. This shall include the following details:

...c. Permission shall be sought from the Planning Authority for the operation of the plant outside the hours 0700 to 1900, Monday to Friday and 0700 to 1600 hours on Saturday. Operation of the plant shall not occur during Sundays and Bank Holidays...

The *Construction Environmental Management Plan* states

Construction Phase Lighting
To minimise potential disturbance to local bats due to lighting during the construction phase, construction works will be carried out during normal daylight working hours as follows:
• Monday to Friday: 08:00 and 19:00; and,
• Saturdays: 08:00 to 14:00
• No Sunday work will generally be permitted.
Where nighttime lighting cannot be avoided due to health and safety concerns, the lighting within the Proposed Development will be designed and installed to minimise the impact on local wildlife and in accordance with the Bat Conservation Trust guidelines on artificial lighting and bats (ILP, 2023) and in accordance with recommendations provided in the Guidelines for Ecologically Responsible Lighting (Crymble et al., n/d):

The above implies that there should be no lighting on the development site at night time. However, *10.5.1 Construction Phase* of the EIAR references security lighting stating

The expected landscape and visual impacts include:
• Numerous large, brightly coloured earth moving equipment, construction machinery, cranes operating on the site and construction site offices/facilities, security lighting and fencing etc,

There is clearly a discrepancy between the work hours stated in the planning conditions and in the *Construction Environmental Management Plan*, with the planning conditions permitting work from 7am, not 8am Monday-Friday as suggested in the *Construction*

Environmental Management Plan. In addition, the planning conditions allow for work from 7am to 4pm on Sundays, whereas the *Construction Environmental Management Plan* state Saturday hours as 8am to 2pm. In fact, the planning conditions suggest that hours could be extended once *permission* is obtained from Wexford County Council.

As the planning conditions request an updated Construction Environmental Management Plan incorporating the details contained in Condition no. 4 of the planning permission, this effectively means that the working hours will be the longer hours as outlined in Condition No. 4. The estimated construction time for the development is given as approximately 3 years. This means that work will be completed through a number of autumns and winters when daylight hours are short and light quality can also be poor. I assert therefore that it is very likely that artificial light will be required on the subject site. This is compounded by the duration of construction.

Therefore I assert that Mitigation Measure 6 is not adequate.

In addition, the NIS states in *5.3.1 Summary of Potential Effects*

Operational Phase include:

- *Spread of invasive species from the Site to the QI habitats of Saltee Islands SAC or the habitats supporting SCI species of Seas off Wexford SPA in the event that invasives are inadvertently introduced by landscaping.*
- *Light disturbance to SCI species of Seas off Wexford SPA and Saltee Islands SPA.*

5.3.5 Operational Phase
5.3.5.1 Mitigation 10: SCI bird-friendly Operational Phase Lighting
Artificial lighting at the Site should be designed so as to minimise any potential for significant effects on SCI birds in flight throughout the Operational lifetime of the Site. Consideration should be given to the following common issues that arise as a result of light pollution: glare, light trespass, over-illumination and sky glow (Crymble, n/d). The following measures will ensure the protection of seabirds and other birds in flight throughout the lifetime of the Operational Phase of the Proposed Development:

• LED luminaires possessing a warm white spectrum (<2700k) will be used so as to reduce the blue light component. LED lights are also ideal due to their sharp cut-off, lower intensity, and dimming capabilities.
• External lighting will be set on motion-sensors and short (1min) timers.
• Balcony lighting should be switched off as default, with the option to turn lights on given to the room's occupants using a timer switch.
• Column heights should be carefully considered to minimise light spill. The shortest column height allowed should be used where possible.

• Fixtures should be downward facing with limited light spill. As a last resort, accessories such as baffles, hoods or louvres will be used to reduce light spill and direct it only to where it is needed.
• There will be no light spill outside of the southern boundary of the Site onto the shoreline, and light will be directed away from the shoreline. This should be relatively easy to achieve with the 100m coastal buffer in place along the southern bounds within which no development aside from a small path is to occur.
• Hotel guests should be informed upon arrival of the steps taken by the hotel owner or operator to reduce light pollution and the reasons why they are being implemented.

I assert that the proposed development will produce a level of light that will negatively affect biodiversity in the area. I assert that the above mitigation measures are not sufficient.

Mayo Dark Skies in their article entitled *Ecologically Friendly Lighting Practices*[3] state that a lighting level of 2200k should be used to *protect biodiversity corridors (lower again for bat sensitive areas)*. They recommend a maximum light level of 2200k along rivers and water bodies.

Lighting near waterbodies - public lighting along rivers and water bodies should be adaptive and using the lower correlate colour temperature possible to avoid environmental harm to aquatic species. Maximum levels of 2200 kelvin are recommended and the use of adapting/timing to avoid lights being on all night unnecessarily.

The above states *Balcony lighting should be switched off as default, with the option to turn lights on given to the room's occupants using a timer switch.*

I assert that the above is not a mitigation measure as guests' behaviour in regards to lighting on balconies cannot be controlled.

There will be no light spill outside of the southern boundary of the Site onto the shoreline, and light will be directed away from the shoreline. This should be relatively easy to achieve with the 100m coastal buffer in place along the southern bounds within which no development aside from a small path is to occur.

The above refers again to the proposed "buffer zone". Again, as noted earlier, the "buffer" zone is to contain pathways. Are these pathways to go unlit? These pathways are not just referenced as pathways for leisure use, they are referenced as pedestrian links to Kilmore Quay. Therefore, they would need to be lit for people to use them at evening & night-time. In

[3] Mayo County Council. (2025). *Ecologically Friendly Lighting Practices*. Available: https://consult.mayo.ie/ga/node/4033?language=ga

the darker part of the year, it can be dark from 4pm onwards. Are these paths to remain unlit and therefore not be a viable pedestrian link to Kilmore Quay?

• *Hotel guests should be informed upon arrival of the steps taken by the hotel owner or operator to reduce light pollution and the reasons why they are being implemented.*

The above implies that hotel guests will be informed about light pollution in an effort to stop them contributing to it. The method by which the guests will be informed is not given – will it be via written material or verbally etc.

Other mitigation measures quoted are equally vague, such as the below.

Column heights should be carefully considered to minimise light spill. The shortest column height allowed should be used where possible.

No details of actual column heights are quoted.

I assert that due to the vague nature of some of the mitigation measures listed, along with the reliance of actions of guests – which cannot be controlled – that the mitigation measures quoted are unsatisfactory. I assert that the proposed development will result in light pollution that could negatively affect biodiversity.

5.3.4.9 Mitigation 9: Removal of Invasive Flora

As discussed further in I assert that insufficient details in relation to type of herbicide and potential negative effects on the adjacent SPAs and SACs has been outlined.

Given the close proximity of the proposed site to 2 no. SPAs and 2 No. SACS and the potential for significant negative effects, as outlined in the EIAR, in the absence of mitigation. I assert that the proposed development should not be granted given what I assert are the flawed outlined mitigation measures outlined above.

2) Environmental Impact Assessment Report (EIAR)

Table 2-2 List of Cumulative Schemes of the EIAR list three developments.
I assert that the list is not comprehensive. For example, it does not include planning no. 20231081 (granted June 2024) for

Permission for a ten year planning permission for a renewable energy development comprising the construction of a solar farm of 44.4ha and related works in the townlands of Hooks, Pembrokestown, Richfield (Reclaimed), Inish and Ballyteigue Slob, Riesk, Yoletown, and Kilcowan Lower. The proposed development will consist of: a) A 21 MWp solar farm comprising ground mounted solar photovoltaic (PV) panels, b) 7 no. inverter/transformer power stations, c) 3 no. spare parts storage containers, d) provision of a new site access from the northwest of the site, e) construction of internal cable duct to connect the solar array to the existing Richfield Wind Farm 38kv substation, f) provision of 2 no. containerised substations adjacent to the existing Richfield Wind Farm substation, a transformer, grid compensation equipment and lighting, g) 2 no. temporary construction compounds., h) All ancillary development such as 2.2m high stock proof post and wire fencing, CCTV and drainage infrastructure. This application is seeking a ten year permission and a 35 year operational period from the date of overall commissioning of the solar farm. This application is accompanied by a Natura Impact Statement (NIS).

The omission of the above application is of particular relevance as an NIS was required and it is in close proximity to the same SPAs and SACs that the subject site is. The site is located approximately 5Km north west of the proposed development site.
It must be noted that all three of the listed developments in *Table 2-2 List of Cumulative Schemes* required a NIS.
In relation to cumulative effects, the EIAR simply lists three developments. It does not discuss possible cumulative effects in relation to issues such as hydrology, flora, fauna etc.

A full ecological survey does not appear to have been undertaken. No stand alone ecological report was submitted as part of the planning application. It is usual for a stand alone ecological report comprehensively covering all flora, fauna and habitats on a subject site be provided. This is compounded by the need for an EIS due to the large scale nature of the proposed development.
Flora and fauna are discussed in the EIAR including details of desk and field surveys. However, as discussed in the relevant sections below I assert that details provided of survey results etc. are lacking. I also have concerns in relation to how surveys were conducted. Given the size of the development site and its proximity to numerous SPAs and SACs, I assert that this is a severe lacuna in the environmental assessments.

5.2.3 *Field Surveys* of the EIAR states

To determine the likely ecological constraints at the Site, a multidisciplinary walkover survey was carried out on the 5th of December 2023 and updated on the 7th of June 2024. This survey covered the following aspects:

- *Habitat mapping to level 3 (Fossitt 2000)*
- *Preliminary Bat Roost Assessment and Habitat Suitability Survey*
- *Bird Scoping Survey*
- *Invasive Flora Survey*
- *A search for signs of protected fauna (e.g., mammals, reptiles, amphibians)*

As highlighted in Point 1: Appropriate Assessment & EIS The Department of Housing, Local Government & Heritage in their letter dated September 25th 2025 to Wexford County Council raised issues in relation to deficiencies in the baseline data for the proposed development site.

10.5.2.1 Potential Landscape Impact of the EIAR states

As the main tree, hedge and shrub elements of the proposed development establish and grow the mass of the proposed development will become more broken up and less visible. This will further reduce the initial landscape impacts from moderate to minor or negligible.
In addition, it is worth mentioning that developments that at first might be regarded by the public as notable can be expected overtime to gradually diminish and will be perceived as part of the background with time.

I assert that the above is an irrelevant observation. Yes, the proposed development if built will seem obtrusive to locals when built. Yes, they eventually are likely to get "used" to it being there. However, it will still look out of place due to its scale in what is a low build area. This is compounded by the coastal location and sensitive nature of the adjoining areas.

3) Bat Surveys

No stand alone bat survey document appears to have been submitted as part of the application. A bat transect survey was conducted, however no static bat transect survey was conducted. It states in the EIAR in relation to the bat transect survey

The surveyor was equipped with a Elekon Batlogger M2 detector and powerful L.E.D. torch and head torches. Surveys started at sunset and continued for 1-2 hours, along a predesigned transect route with regular point counts...

First, I assert that a *powerful L.E.D. torch* should not have been used as this would disturb, startle and frighten away bats.
In addition, static detectors should have been used to gain more accurate results. This is compounded by the shear size of the site. The above extract states that the survey continued for 1-2 hours – this is very vague, the precise time should be recorded. In addition, given the size of the site, the time required to traverse it would be significant, therefore, each point could not be passed very many times in such a short period of time.

Bat Mitigation Guidelines for Ireland – V2 published by the National Parks & Wildlife Service (NPWS) recommend the use of static detectors. They recommend that they are left insitu for over one week for large projects. Please see extract below and Appendix F attached

The use of static detectors has increased significantly in recent years as the technology has improved and equipment has become more affordable. These devices offer many advantages over conventional hand held detectors due to the length of time they can be left in situ. It is recommended that they are left in place for a minimum of one week, but for larger projects it can be useful to leave them in situ for longer. As well as recording the species present, including quieter species potentially missed during a walked survey, the resulting data from these devices can provide an overview of diurnal and even seasonal activity patterns...
5.3.4.2.2.3 Bat Roost Emergence Surveys states
...As a general guide, low activity comprises less than 10 bat passes per hour, medium is equal to or greater than 10 bat passes per hour, and anything above 50 bat passes per hour is considered high.

According to *TABLE 5-10. BAT ROOST EMERGENCE SURVEY RESULTS* on September 3rd 2024 there were 66.7 bat passes per hour (bph) recorded by "detector 2" for the Common Pipistrelle bat. This is high according to the extract above. 10.7 bph were recorded for the Soprano Pipistrelle on the same date on the same detector – this equates to medium activity.

5.3.4.2.2.3 Bat Roost Emergence Surveys also states

Surveyors noted that although the number of bat passes appeared to be high, passes could be attributed to a small number of bats passing through repeatedly. Furthermore, no activity was observed until approximately 15-30 minutes into the survey having commenced, which further supports the lack of roosting at the Site; it is presumed bats are roosting elsewhere in the wider area, but commuting through the Site on the way to their foraging location.

The statement of *Surveyors noted that although the number of bat passes appeared to be high, passes could be attributed to a small number of bats passing through repeatedly* could be misleading. While a high number of bat passes per hour could indicate a lot of activity by a small number of bats, it could also indicate a lower activity by a large number of bats.

In relation to no activity being observed until 15-30 minutes into the survey, I assert that this does not prove that no bat roosts are present on site. Different species of bats emerge at different times. Emergence time also varies depending on the time of year. This is highlighted in the extract below from the *Bat Mitigation Guidelines for Ireland – V2* which states

The optimum time for dusk surveys at buildings, particularly during early summer is for the two hours after the first bats emerge as this will cover the emergence period as well as the first return to the roost for some species. The time of first emergence varies between species, with Leisler's leaving around sunset and Natterer's bats leaving about 1 hour after sunset. Bats using underground sites during the summer may not emerge till much later, perhaps even 4 hours after dark. Towards dawn, many bats swarm outside their roosts and surveys beginning about 90 minutes before sunrise and continuing until 15 minutes after sunrise ('sunrise surveys') are recommended. In autumn, it is possible to detect the social calls of males of some species of bats, notably Leisler's and pipistrelles. Surveys at this time of the year should begin about 30 minutes after the species' emergence time and it may be necessary to set the bat detector to record lower frequency social calls.

In addition, according to *Table 3.3 Summary of emergence times extracted from Andrews & Pearsons, 2022* of *Bat Surveys for Professional Ecologists, Good Practice Guidelines published by the Bat Conservation Trust UK*, the mean time for the Common Pipistrelle to emerge after sunset is 24.8 minutes.

4) Bird Surveys

The breeding bird survey noted numerous bird species breeding onsite including Meadow Pipit (*Anthus pratensis*) which is a red listed species. Curlew (*Numenius Arquata*) which are also red listed were noted in the same survey. *TABLE 5-14. BIRDS RECORDED AT THE SITE DURING THE THREE BREEDING BIRD SURVEYS* stated that they were *Non-breeders foraging in a small pool on the site.* Red listed species were also noted in the preliminary walkover of December 2023 including two no. Common Snipes (Gallingo gallingo) described in *TABLE 5-13. BIRDS RECORDED AT THE SITE DURING THE PRELIMINARY WALKOVER SURVEY IN DECEMBER 2023* as *flushed from wet areas BC4 habitat.*

The wintering bird survey of December 11th 2024 noted 65 no. individual Black-headed Gull *(Chroicocephalus ridibundus*), an amber listed species at *the small pool to the southwest of the Site*. On the same day 12 no. Oystercatcher (*Haematopus ostralegus*), a red listed species were noted at the same pool. Six no. Redshank (*Tringa tetanus*) and 1 no. Snipe (*Gallinago gallinago*), both red listed species were noted on the same day at the same pool.

The pool to be maintained onsite is on the eastern side. Therefore, I assume the pool referred to above is where water was recorded as "pooling" on the southern edge of the site in drawings submitted as part of the planning application. If the proposed development is built, water will no longer pool in this area as attenuation ponds are proposed further east outside of the "buffer zone"

The above number of birds show the importance of the site to birds in the area.

5.3.4.3.2.3 Wintering Bird Surveys

The results of the wintering bird surveys undertaken at the Site and along the shoreline to the south of the Site are summarised below in

Table 5-15. A number of red and amber listed species have been recorded both using the Site and using the shoreline to the south, as well as a few green-listed species.
The greatest number and variety of species were recorded on the final survey on the 7th of February 2025. The lowest activity levels along the shoreline were noted on the 11th of December 2024, although the lowest activity levels overall (encompassing the Site of the Proposed Development and the shoreline) were recorded on the 19th of November 2024. Oystercatcher, cormorant, redshank and a variety of different gull species were all recorded regularly along the shoreline in small groups across the six wintering bird surveys. gull species were also regularly recorded using the southern bounds of the Site where water pools had formed and were regularly recorded flying overhead. While some of the below listed species may overlap with nearby SCIs of SPAs, the number of birds present does not meet the criteria to be classed as being of international, national or county importance, and are considered to be of importance in the locality (NRA, 2009b).

While the numbers of birds that are qualifying species of adjacent SPAs noted on the subject site may not be *of international, national or county importance*, qualifying species clearly use the subject site for foraging, hunting and breeding. While the subject site is not within a SPA or SAC it is located adjacent to four (2 no. SPAs and 2 no. SACs). If qualifying species are negatively affected by the proposed development it is very relevant as it could negatively affect species numbers on the qualifying site.

Large proportions of the birds noted on the wintering bird field surveys as outlined in *TABLE 5-15. WINTERING BIRDS RECORDED BOTH WITHIN THE SITE AND ALONG THE SHORELINE TO THE SOUTH OF THE SITE* were red or amber listed species.

5.3.4.3.2.1 Bird Scoping Survey of the EIAR states

During the Site walkover on the 5th of December 2023, 17 no. confirmed species of birds were recorded (Table 5-13) at the Site. Of these, four are red-listed, five are amber-listed and the remaining species are green-listed. One of the species, herring gull (Larus argentatus), corresponds with the SCI species for which nearby Ballyteigue Burrow SPA (004002) is designated, while bar-tailed godwit and black-tailed godwit are SCI species of nearby Saltee Islands SPA. Additionally, unidentified raptor feeding signs were identified at the Site in the form of dead gull remains, including large numbers of feathers suggesting plucking.

The above figures equate to 53% of the birds noted on site being either red or amber listed.

If we take the figures from *TABLE 5-15. WINTERING BIRDS RECORDED BOTH WITHIN THE SITE AND ALONG THE SHORELINE TO THE SOUTH OF THE SITE* we can see that the majority of species observed were red or amber listed species. Please see table below

Survey Area	Total No. of Bird Species *	No. Amber Listed	Percentage Amber Listed	No. Red Listed	Percentage Red Listed
"Within Site Boundary"	55	29	53%	21	38%
"Saltee Shore"	41	16	39%	15	36%

* Total figure of species observed on each day of six day survey

As can be seen from the table above, a higher proportion of the birds observed on the subject site were either amber or red listed when compared to those on "Saltee Shore". This clearly indicates the importance of the subject site for bird life. As can also be seen from the above, 91% of the birds observed on the subject site were amber or red listed. 75% of the birds observed on the "Saltee Shore" were either amber or red listed.

The site is clearly used by qualifying interest species of the adjacent. SPAs. The above details shows the importance of the subject site for bird activity including, red, amber and green listed species. I assert that no matter what mitigation measures are implemented that bird activity will be negatively impacted on the subject site due to disturbance from people, buildings, noise & removal of foraging and suitable breeding areas.

Table 3-2 County Wexford Settlement Hierarchy of the *Wexford County Development Plan* 2022-2028 categorises Kilmore Quay as a 3b Strategic Settlement. 3.6.4 *Level 3b Strategic Settlements* states under *Development Approach*

- *...Protect and enhance amenities, heritage, green infrastructure and biodiversity in these settlements....*

I assert that the granting of the proposed development would be contrary to the above.

In their letter to Wexford County Council dated September 8th 2025, An Taisce raised concerns in relation to disturbance of qualifying species from nearby SPAs using the proposed site stating

We note that bird surveying done on the site identified several bird species, including qualifying interests of the nearby SPAs, using the subject site, primarily the southernmost area which will form part of the 100m coastal buffer zone. The applicant states that this area will not be subject to development, however, a new walking path will run through the area. NIS section 4.4.4.2 assesses potential disturbance as a result of walkers on beaches, however, the potential for ex-situ disturbance as a result of walkers on the proposed path in the buffer zone also requires assessment. It is submitted that signage and other deterrence measures to prevent walkers from leaving the proposed path should be included.

The above recommended details were not requested by Wexford County Council.

Figure 10-9 Sections showing buildings absorbed into the landscape of the EIAR states that the existing "open boundary" along the subject sites boundary with the proposed development is to be maintained. This means that anyone walking along the proposed walkways in the "buffer" zone will be able to step directly down onto the beach from the subject site.

It must be noted that the area of the proposed 100m "buffer" zone is marked as *Landscaped Parks* on the drawing entitled *Kilmore Quay Masterplan Land Uses* of the *Architectural Design Statement* submitted as part of the planning application.

I assert that there are various lacunae in the recorded bird survey findings. For example, the number of curlew observed (*Numenius Arquata*) *foraging in a small pool on the site* is not noted.

TABLE 5-15. WINTERING BIRDS RECORDED BOTH WITHIN THE SITE AND ALONG THE SHORELINE TO THE SOUTH OF THE SITE notes 4 no. red listed species on the site

on Survey 1: 5th November 2024. It gives the total no. of each of three of the red listed species but does not give the total no. for the fourth – Meadow Pipit (*Anthus pratensis*).

On the 11th December 2024 a Skylark (*Alauda arvensis*) was noted. However, *TABLE 5-15. WINTERING BIRDS RECORDED BOTH WITHIN THE SITE AND ALONG THE SHORELINE TO THE SOUTH OF THE SITE* does not note its BoCCI status as it does for the other listed birds. It should be noted that it is "amber".

5) Flora & Fauna

A comprehensive list of flora onsite is not provided in the documents submitted as part of the planning application. Only invasive species present are noted. Details such as length of hedgerow and how much is to be retained are not noted.

ABLE 5-17. EVALUATION OF DESIGNATED SITES, HABITATS, FLORA AND FAUNA RECORDED WITHIN THE SITE AND THE SURROUNDING AREA. THOSE IDENTIFIED AS KEY ECOLOGICAL RECEPTORS (KERS) ARE HIGHLIGHTED IN GREEN

5.3.4.4.2 Field Study Results of the EIAR states

There was no evidence indicating that the Site is regularly used by protected mammals such as badger (Meles meles) or otter (Lutra lutra) ...

...While there is some suitable habitat for otter in the form of a wet drainage ditch on-Site and the connected shoreline to the south of the Site, no evidence of otter was noted, although this species has been recorded in the 2km grid squares that encompass the Site (NBDC) and its presence cannot be precluded.

Brendan O'Flaherty has observed otters in his garden at his pond. His residence is located adjacent to the proposed development site – please see site location map attached.

6) Treelines, Hedgerow & Water Pooling

4.2.2 Relevant Field Survey results of the NIS states

The habitats present within the Site, as recorded during the field survey, are described in this section, and summarised below. Site photographs are included in Appendix I for context, and a map of the habitats is presented Figure 5 below.

The majority of the Site consists of arable crop (BC4) habitat which was cut just prior to the survey. The entrance road to the Site contains dry meadows and grassy verges (GS2), which forms a mosaic with the scrub (WS1) habitat. A small unmapped stream runs along the eastern boundary of the Site, discharging into the sea to the south of the Site. Some areas of the Site are bounded by fenceline only, while others are hedgerow (WL1), treeline (WL2) or scrub (WS1). A raised pond (FL8) with steeply sloping edges is located to the east of the Site. A cluster of four derelict buildings are situated to the west by the entrance road to the Site.

While *Figure 5 HABITATS FOUND AT THE SITE OF THE PROPOSED DEVELOPMENT* of the NIS maps the location of the above mentioned habitats, no arboricultural report was included with the planning application. Hedgerow measurements are not given – neither existing or what length is to be removed. Tree numbers, species and condition are not given. Neither are details of what trees are to be removed or retained.

7) Wastewater Connection

Kilmore Quay WWTP does not currently have capacity to cater for the proposed development. In their letter dated 25th September 2025 to the developer, Uisce Eireann state that an upgrade to *the phase 2 future design horizon* will be necessary to accommodate the proposed development. They also state that *Uisce Eireann currently have no plans to undertake these works as part of their capital investment programme, therefore the applicant will be required to fund these upgrade.*

8) Coastal Erosion

The *Environment Report (Coastal)* prepared by Wexford County Council's coastal engineer states that *the Irish Coastal Protection Strategy Study (ICPSS) shows the location as a shoreline subject to future erosion at the medium confidence level.*

The *Irish Coastal Protection Strategy Study* (ICPSS) provided strategic assessment of the extent of coastal erosion and coastal flooding. The study was completed in 2013. The relevant document for the proposed site is *Irish Coastal Protection Strategy Study Phase 2 - South East Coast* published in June 2010.

Given the time elapsed since the ICPSS, I assert that the information, or at least some of the information, contained therein is out of date. This fact is acknowledged in *12.5.4 Coastal Erosion* of the *Wexford County Development Plan* 2022-2028 which states in relation to the ICPSS

It is important to note that the impacts of climate change and the related sea level rise and increased frequency and severity of coastal storms are not taken into account in these studies.

There have been various incidents of coastal erosion in the last number of years along the relevant coastline. For example, in 2024, approximately three metres of cliff land fell into the sea along the Kilmore/Rosslare coastline – please see appendix B attached.

The *Environment Report (Coastal)* prepared by Wexford County Council's coastal engineer states that Objective CZM35 applies to the subject site. This objective is the basis for the 100m "buffer" zone being provided – please see Objective CZM35 below.

Objective CZM35 (new developments within settlements with no coastal protection works)

Within established coastal settlements located on a soft shoreline and where there is an identified coastal erosion risk and where there are no coastal protection works in place and no such work is underway or planned by the Council, the Council will only consider the development of infill sites where the development is ***a minimum of 100m*** *(or such*

greater distance as may be specified by the Planning Authority having regard to the data sources referred to in Objective CZM29) from the soft shoreline. In those circumstances the following applies:

a. *The development must not extend the length of the coastline that may require coastal protection works in the future.*

b. *The applicant must objectively establish based on the best scientific information available at the time of the planning application that the likelihood of erosion at the location is minimal taking into account, inter alia, any potential impacts of the proposed development on erosion or deposition.*

c. *The onus will be on the applicant to provide the evidence (including appropriate modelling which incorporates climate change) to demonstrate that the development will not be at risk over its lifetime. The Planning Authority will have regard to recent and historic trends and events and the data sources referred to in Objective CZM29 in assessing such applications.*

d. *The applicant must also demonstrate that the proposed development will not pose a significant or potential threat to coastal habitats or features, and is compliant with the Habitats Directive.*

I assert that the proposed 100 metre "buffer zone" is inadequate to prevent possible coastal erosion and negative effects to the adjoining SACs & SPA. It must be noted that a minimum of 100 metres is required – I assert that a larger "buffer zone" should have been requested. Given the total site area of 20.3 hectares, a larger buffer could be provided. This is compounded by the fact that the "buffer zone" includes walking paths. Therefore the "buffer zone" will not act as an undisturbed buffer. This issue was raised by An Taisce in their letter dated September 8th 2025 to Wexford County Council which states

We note that bird surveying done on the site identified several bird species, including qualifying interests of the nearby SPAs, using the subject site, primarily the southernmost area which will form part of the 100m coastal buffer zone. The applicant states that this area will not be subject to development, however, a new walking path will run through the area. NIS section 4.4.4.2 assesses potential disturbance as a result of walkers on beaches, however, the potential for ex-situ disturbance as a result of walkers on the proposed path in the buffer

zone also requires assessment. It is submitted that signage and other deterrence measures to prevent walkers from leaving the proposed path should be included.

As found in *Shannon Regional Fisheries Board v. ABP* [1994], a purposive approach to interpretation should be given. In addition, *EPA vs. Harte Peat Ltd.* (2014) IEHC 308, found that an interpretive approach that gives greatest protection to the environment should be used.

I assert that the proposed development is contrary to the objectives below of the *Wexford County Development Plan* 2022-2028

Objective CZM01

To ensure the sustainable development of the county's coastal areas and the maritime area for the long term benefit of coastal communities and the economic well-being of these areas and the county whilst protecting and enhancing environmental quality and managing and restoring biodiversity.

Objective CZM03

To maximise the economic development potential of the county's coastal and maritime areas subject to compliance with the objectives of the County Development Plan with regard to the location of economic development, the protection of the scenic amenity and views associated with coastal areas and the maritime area which is crucial to the tourism industry, the protection of the amenity, livelihood and cultural well-being of coastal communities, the protection and restoration of coastal features, habitats and species, compliance with the Habitats Directive and normal planning and environmental criteria and the proper planning and sustainable development of these areas.

I also assert that the proposed development is contrary to the below tourism objectives of the *Wexford County Development Plan* 2022-2028

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.

Objective TM04

To implement the County Wexford Tourism Strategy 2019-2023 subject to compliance with the Habitats, SEA, EIA and Water Framework Directives and normal planning and environmental criteria.

9) Car Dependency

Public transport to Kilmore Quay is limited. The only public service connection is Wexford Bus' Route 390 service. There are six services from Wexford Town to Kilmore Quay. Monday to Sunday (0:7:00, 08:25, 11:30, 13:30, 15;30 & 17:35). On Sundays just three services operate (11:30, 13:30, 15:30). There are also six return services to Wexford on Monday to Saturday (07:35, 9:30, 12:30, 14:30, 16:30 & 18:30). Again, on Sundays, three operate (12:30, 14:30 & 16:30) – please see Appendix D attached.

This means that the planned development will be car dependent. I assert that not only will the volume of traffic created by the proposed development potentially cause traffic disruption and traffic safety issues, it is contrary to Wexford County Council's climate action plan.

In addition, the proposed development appears contrary to *The Wexford Destination and Experience Development Plan* (Wexford *DEDP*). This is a five year tourism development plan for County Wexford developed through a programme of research and consultation guided by the V.I.C.E. (Visitor, Industry, Community, Environment) model for sustainable tourism.

STRATEGIC OBJECTIVE 3 of *The Wexford Destination and Experience Development Plan* is to *Ensure the destination is easy to access, navigate and consume.* It states

Maximise the potential of existing accommodation hubs to act as gateways into the rural and coastal Wexford experience.

Despite the large volumes of additional traffic that will be generated in Kilmore Quay as a result of the proposed development, no traffic impact assessment report appears to have been conducted.

10) Contrary to *The Wexford Destination and Experience Development Plan*

The Wexford Destination and Experience Development Plan states under *Coastal Activity Centres*

OBJECTIVE: Develop a best-in-class coastal activity tourism destination that motivates domestic and international visitors to explore Wexford's coastal communities.

Elevating the Wexford outdoors experience requires a sustainable development focus on both the rural and coastal experience. Wexford's heritage as a coastal destination provides the platform to further enhance the coastal tourism experience and grow its appeal to international visitors. This will require an experience development focus on a number of coastal areas to include Hook Head Peninsula, Curracloe, Rosslare and Courtown. These areas will be assessed to understand their capacity to develop into coastal tourism activity hubs.

As can be seen from the above *Hook Head Peninsula, Curracloe, Rosslare and Courtown* are earmarked to become *coastal tourism activity hubs, not* Kilmore Quay.

The Plan also states

Guiding Principles

Sustainable tourism development guidelines and management practices are applicable to all forms of tourism in all types of destinations, including mass tourism and the various niche tourism segments. Sustainability principles refer to the environmental, economic, and socio-cultural aspects of tourism development, and a suitable balance must be established between these three dimensions to guarantee its long-term sustainability. To ensure the successful implementation of the Wexford DEDP experiences and the creation of a sense of place, the following guiding principles have been established to guide certain recommendations and projects listed in this section.

- *All projects are self-sustainable, meaning they have access to capital and are not relying solely on grant aid to be developed or maintained.*
- *All projects are on-message with the Wexford DEDP experiences and are aligned to the broader mission of Ireland's.*

As highlighted above, the proposed development does not appear to be *on-message with the Wexford DEDP.*

11) Landowner Consent

Brendan O'Flaherty owns some of the lands where 2 no. walkways from the development are indicated– please see Appendix G attached. There are no existing paths insitu and he has never given his consent for these lands to be used or for planning permission to be applied for on his lands.

12) Management & Operation

Inadequate details have been provided in relation to who will operate the proposed development. If no details are provided in relation to who the operating company will be, this increases the risk that the development could be unsuccessful.

The Wexford Destination and Experience Development Plan (Wexford *DEDP*) states

Guiding Principles

Sustainable tourism development guidelines and management practices are applicable to all forms of tourism in all types of destinations, including mass tourism and the various niche tourism segments. Sustainability principles refer to the environmental, economic, and socio-cultural aspects of tourism development, and a suitable balance must be established between these three dimensions to guarantee its long-term sustainability. To ensure the successful implementation of the Wexford DEDP experiences and the creation of a sense of place, the following guiding principles have been established to guide certain recommendations and projects listed in this section.

- *All projects are self-sustainable, meaning they have access to capital and are not relying solely on grant aid to be developed or maintained.*
- *All projects are on-message with the Wexford DEDP experiences and are aligned to the broader mission of Ireland's.*

13) Planner's EIA Report

The planner's EIA report states

It is considered that there is not the potential for adverse impacts on the receiving environment as a result of the construction, and operational phase of the proposed development as outlined in the planning report which accompanies this EIAR report.

I assert that the above statement is inaccurate. There is *potential* for adverse impacts. This is clearly outlined in the NIS & EIAR. Without mitigation measures or should the mitigation measures fail it is very likely that there will be adverse effects.

14) Unnamed Watercourse

There is an unnamed watercourse onsite that outfalls directly to the sea.

1.3.2.1 Surface water of the EIS states

There is an existing stream / wet drain on the eastern boundary of the site which runs in a southerly direction and discharges directly to the sea. This stream is not mapped by EPA or the Water Framework Directive but is visible on OSI 6-inch map as shown in Figure 2 (Source: GeoHive).

I assert that the mitigation measures outlined in the NIS & EIAR are not adequate to ensure that no pollution will occur to this watercourse.

15) Photomontages

No photomontages to show what the proposed development will look like from the nearest adjoining residences are shown. There are also no photomontages to show what the development will look like from the coast and sea off the development site.

Residents who live adjoining the subject site cannot visualise the proposed development without these images being provided.

16) Not in Keeping with Area & Scale

Kilmore Quay predominately consists of low rise buildings with the exception of some commercial buildings located on the quayside. The houses adjoining the subject site are one-two storey dwellings. The topography of the area is flat.

Volume 7: Landscape Character Assessment of the *Wexford County Development Plan 2022-2028* states in *6.1 Visual Impacts*

The capacity of an area to visually absorb development is also influenced by a combination of the following factors:- 1 Mandatory objective 2(e) of Section 10 of the Planning and Development Act, 2000 (as amended). 1. Topography - development in elevated areas will usually be visible over a wide area; development in enclosed areas will not. 2. Vegetation - areas which support (or which have the potential to support) trees, tall hedges and woody vegetation can screen new development from view. Areas which cannot easily sustain such vegetation will be unlikely to screen new development. 3. Development - New development is less likely to be conspicuous in the context of existing development in the landscape. Impacts may be individual or cumulative, resulting in the gradual erosion of the scenic quality of the area. They may be extensive or cover a small area but be significant. The may be temporary, short, long term or permanent and their significance depends on both the nature of the development, the capacity of the landscape to absorb and the value that is placed on the specific landscape. Impacts may be due to the siting of a development or they may be due to the scale or design. They may also be because the resulting development is alien to the environment in which it is situated. There will be a presumption against developments which are located on elevated and exposed sites. The impacts associated with such developments are further increased when the development, when viewed in context, will break the skyline.

The proposed development is significant with a site area of over 20 hectares. The proposed building heights are entirely not in keeping with the low rise nature of adjoining properties. The site location is coastal, located directly on a headland adjoining 2 no. SPAs and 2 no. SACs. The topography of the area is flat. I assert that the proposed development will "break the sky line" from certain angles. It will be highly conspicuous from the sea.

6.2 Landscape and Visual Impact Assessment In general, the visual impacts of most development will be assessed by the Council in the normal course of the assessment of the planning application. In some instances the Council may require an applicant to prepare a Landscape and Visual Impact Assessment to assist in the assessment of a given development on the landscape due to either the scale, siting or design of the development or the sensitivity of the landscape. Landscape and Visual Impact Assessment (LVIA) is a tool used to identify and assess the effects of change resulting from development on the landscape as an environmental resource and on people's view and visual amenity. An LVIA should identify the significance and magnitude of effects that are expected to occur as a result of a proposed development.

Despite the scale of the proposed development and the sensitive receiving landscape, no *Landscape and Visual Impact Assessment* was completed. Computer generated images were provided but as highlighted no images were provided from the perspective of adjoining properties or from the sea.

I assert that the proposed development is contrary to the objectives of the *Wexford County Development Plan* 2022-2028 outlined below

Objective L09 To protect views worthy of protection, including views to and from sea, river, landscape feature, mountains, tourism sites, landmark structures such a bridges and urban settlements from inappropriate development that by virtue of design. scale. character or cumulative impact would block or detract from such views.

Objective L12 To adopt a presumption against developments which are located on elevated and exposed sites and where the landscape cannot accommodate such development with appropriate mitigation.

Objective L14 To require Landscape and Visual Impact Assessment Reports to be submitted for developments which may have a significant negative impact on the landscape.

Objective L05 To ensure that developments are not unduly visually obtrusive in the landscape, in particular, in or adjacent to the Upland, River Valley, Coastal or Distinctive Landscape Character Units.

Objective L06 To ensure that, where a development will have a negative impact in the Upland, River Valley, Coastal, or Distinctive Landscape Character Unit, an overriding need is demonstrated for that particular development and ensure that careful consideration is given to site selection. The development should be appropriate in scale and be sited, designed and landscaped in a manner which minimises potential adverse impacts on the subject landscape.

The scale of the proposed buildings also gives rise to concerns in relation to bird collisions. *This is particularly relevant given the sites close proximity to numerous SPAs and SACs.*

4.4.6.2 Likelihood of Collision Impacts of the AA & NIS states

The physical location of buildings and structures can influence the likelihood of bird collisions, with structures placed on or near areas regularly used by large numbers of feeding, breeding, or roosting birds, or on local flight path, such as those located between important foraging and roosting areas, can present a higher risk of collision.
The Site itself, although located adjacent to Seas off Wexford SPA, is not adjacent to an SPA designated for wetland bird populations. Ballyteige Burrow SPA is located c. 670m west of the Site and is designated for wetlands and waterbirds. Eight SCI bird species for which Ballyteige Burrow SPA is designated were recorded along the shoreline to the south of the Proposed Development Site during the six wintering bird surveys undertaken. Of these, oystercatcher, curlew, redshank and black-headed gulls were recorded on three occasions; the remaining species, namely, bar-tailed godwit, black-tailed godwit, grey plover, and ringed plover were only recorded using the shoreline during the final survey on the 7th of February 2025. As there were no large flocks comprising SCI bird species of Ballyteige Burrow SPA, (largest no. of birds at one time comprised eight individual redshanks on the 19th of November 2024), the likelihood of collisions of significance impacting upon the SCI bird species for which Ballyteige Burrow SPA is designated is low.

I assert that the NIS is deficient. It fails to take into account species for which the site is not listed and implications for habitats outside of the site. Following *Holohan & ors. V. An Bord*

Pleanála, the NIS must catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are likely to affect the conservation objectives of the site.

It is clear from the wintering bird survey conducted that a high level of bird activity occurs on the site. This is compounded by the sites scale and coastal location adjoining the seashore. The fact that there *were no large flocks comprising SCI bird species of Ballyteige Burrow SPA* recorded on the wintering bird field survey, this does not mean that bird collisions are unlikey. I would assert that given the scale of the proposed buildings in such a coastal location which adjoins numerous SPAs and SACs that the likelihood of bird collisions is high. This is compounded by the low rise nature of adjoining buildings and the low lying topography of the area generally.

4.4.6.3 Building Height of the AA & NIS states

The Proposed Development entails the construction of a hotel development of up to 4 storeys and as such, the risk of migrating birds colliding with the structure due to its height is deemed to be negligible (Migrating species tend to commute far above this with Swans and Geese flying up to 2500ft (ca.750m) during migration along Irish Coasts (Irish Aviation Authority, 2020). Birds that fly over the Site to commute between feeding grounds at various locations would fly lower than this, however, once the proposed structures are made of visible materials i.e., not entirely comprised of reflective materials such as glass, the birds would simply fly around or over them.

17) Overlooking/Loss of Privacy

The proposed development will cause overlooking and loss of privacy to adjoining properties. This is compounded by the scale of the development. Due to the range of buildings included in the development, some adjoining properties will suffer overlooking from a number of buildings.

18) Archaeological Report

No archaeological report was submitted as part of the planning application. In their letter to Wexford County Council dated 22nd August 2025, the Dept. of Housing, Local Government & Heritage stated that an archaeological impact assessment (AIA) *should be requested and submitted as part of Further Information* (F.I.). No such details were requested by Wexford County Council.

19) County Geological Site

St. Patrick's Bridge, which is a County Geological Site (CGS) is a long narrow tidal ridge of bouldery gravel extending almost 4 kilometres south from the Nemestown shore towards the Saltee Islands.

All sites of geological heritage importance are currently classified as CGS until such time that the most significant sites can be designated as geological NHAs.[4]

The County Geological Report for the site states that *This important County Geological Site merits designation as a Geological NHA* – please see Appendix H attached.

The proposed development site is located adjacent to the above CGS. I assert that the proposed development due to its scale and location could visually detract from the above feature.

Objective NH06 of the *Wexford County Development Plan* 2022-2028 states

To recognise the importance of recommended Geological Natural Heritage Areas, proposed Natural Heritage Areas and County Geological Sites and protect the character and integrity of these sites where appropriate. The Council will consult Geological Survey Ireland where a development is proposed that may impact on geological sites.

[4] Geological Survey Ireland. (2025). *Local Authorities and the Heritage* Council. Available: https://www.gsi.ie/en-ie/programmes-and-projects/geoheritage/activities/county-geological-site-audits/Pages/Local-Authorities-and-the-Heritage-Council.aspx

20) Lack of Social Infrastructure

Kilmore Quay is a small village with a population of 447 people.[5] It states in the *Architectural Design Report* submitted as part of the planning application that the proposed development will require approximately 120-200 staff. Based on these numbers, there is not a large enough employment pool in the village to cater for this demand. This is further evidenced by the proposal to build 11 no. staff accommodation apartments containing 55 no. bedrooms. Even if we just assumed that 55 extra people (based on bedroom no.) were brought into the area, that would equate to a population increase of 12.3%.

21) Masterplan

1.12 Kilmore Quay Masterplan of the *Architectural Design Report* submitted as part of the planning application states

Masterplan Introduction
Wexford County council had requested a review of the lands in the ownership of the applicant with regards to potential connections to the adjoining beach and also connections via routes from and through the subject site to Neamestown and Kilmore Quay village.
A masterplan was then prepared which outlined connection from and through the subject site but also reviewed the potential future uses of adjoining lands

1.12 Kilmore Quay Masterplan states that *five sites were included in the area of the Masterplan*

It also states that *Approximately 62% of the masterplan area will be taken up by the Kilmore Quay Resort...*

Proposed Masterplan provides a map outlining the five no. sites and proposed land uses. Kilmore Quay does not have an LAP as its population is not large enough. The formulation of the aforementioned "masterplan" with assigned land use zonings is effectively acting in part as an LAP. However, this was done with no public consultation and it does not appear to have undergone AA Screening.

[5] Central Statistics Office (CSO). (2025). Census data 2022. Available. https://visual.cso.ie/?body=entity/censusurbanprofiles

In addition, the AA documents submitted as part of the planning application failed to consider the larger "masterplan".

As found in *Fitzpatrick & anor -v -An Bord Pleanala & Ors* [2019] IESC23in regards to EIS it is obligatory to take account, as far as practicably possible, of potential later phases of the masterplan.

22) Pedestrian Safety

2.2 Access to The Site of the *Architectural Design Statement* states *Pedestrian access is provided from the scheme as follows: 1. From the R739 access road entrance (north of the site). 2. Through the adjoining lands to Echo Beach (west of the site).*

There is no public footpath provided from the above mentioned accessways along the R749 into Kilmore Quay.

2.2 also refers to the pedestrian access below

3. Via the existing Mass Path to the south west of the site to Kilmore Quay.

Two pathways are shown on drawings submitted for planning on lands to the southwest. As discussed further in Point 11: Landowner Consent above, these are shown crossing Brendan O'Flaherty's land. He states that there are no paths insitu and that he does not give permission for his land to be included in the application for planning permission.

22) Presentation of Reports

The EIAR contains no Table of Contents, making it difficult to navigate. A Table of Contents is essential in a document of its size (606 pages).

23) Conflicting Details

The various documents submitted as part of the planning application refer to different estimated construction periods, varying from 2 years to 3 years. The construction period is very relevant given the location of the proposed development to numerous SPAs and SACs as

construction activities have been outlined as potentially having negative effects on the SPAs and SACs.

5.2.1 *Potential Impacts of the Proposed Development* of the NIS states an "estimated" construction phase duration of 2 years.

The *Outline Construction & Environmental Management Plan* (OCEMP) states an estimated construction period of 36 months.

Appendix A

An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

Planning Ref: 20250962W
(Please quote in all related correspondence)

22 September 2025

Director of Services-Planning
Wexford County Council
County Hall
Carricklawn
Wexford
Y35 WY93

Via *eReferral* or email: control@wexfordcoco.ie

Re: Notification under Article 28 (Part 4) or Article 82 (Part 8) of the Planning and Development Regulations, 2001, as amended.

Proposed Development: A 10 year planning permission for development of an Integrated Tourism Resort Complex. The development will consist of: A central hotel, ranging in height from 1 to 4-storeys over a lower ground floor providing 163 no. bedrooms, 42 no. family suites (84 no. bedrooms), bar and restaurants, function/conference centre facility and spa/leisure complex with swimming pool; 55 no. large family friendly tourist lodges comprising 2 no. 8-bed, 2 no. 6-bed, 21 no. 4-bed and 30 no. 3-bed lodges; Pavilion restaurant; 11 no. staff accommodation apartments providing 55 no. bedrooms in 6 no. 2-storey buildings; External sports, recreation and play facilities provided throughout the site; Refurbishment and reuse of the Beak farmstead buildings and courtyard for tourism and heritage purposes, with family lodge reception and recreation management, resort shop, café/restaurant, arts/crafts spaces; Facilities also include maintenance store, bicycle shelters, car / bus drop-off and parking, landscaped green spaces with pedestrian routes through the site, PV panels, ESB substations and pumping station; Vehicular access to the development is from the Kilmore Road (R739) with pedestrian/cycle connections into Kilmore Quay village centre and to Nemestown; A section of c.85m of new footpath is proposed connecting Echo Beach to Ard Na Ba along the R739 and a new pedestrian crossing of the R739; All associated site works and services at Beak/Nemestown, Kilmore.

A Chara

I refer to correspondence received on 15 August 2025 in connection with the above.

Aonad na nIarratas ar Fhorbairt, Oifigí an Rialtais, Bóthar an Bhaile Nua, Loch Garman, Y35 AP90
Development Applications Unit, Government Offices, Newtown Road, Wexford, Y35 AP90
manager.dau@npws.gov.ie
www.gov.ie/housing

Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Archaeology

The proposed greenfield development site covers an area of c. 20.3 hectares in a coastal location, which may have been suitable for human settlement in the past. There is a possibility that archaeological remains may survive within the footprint of the proposed development and a fieldwork-based archaeological impact assessment (AIA) is recommended to determine the nature and extent of any surviving archaeological remains and to develop an informed archaeological mitigation strategy in advance of any planning decision.

An AIA report prepared by Horizon Archaeology Ltd is included in the Environmental Impact Assessment Report (EIAR) submitted with the planning application. The archaeological assessment was largely desk-based and the report recommends that a fieldwork-based archaeological assessment, in the form of geophysical survey and archaeological testing (licensed under the National Monuments Acts 1930-2014), should be conducted at the site.

This Department recommends that a fieldwork-based AIA, as described below, be prepared to assess the potential impact, if any, on archaeological remains in the area where development is proposed to take place. The AIA should be requested and submitted as Further Information. This will enable the Planning Authority and this Department to formulate an informed archaeological recommendation before a planning decision is taken.

Fieldwork-based AIA to be requested as Further Information;

1. The applicant is required to engage the services of a suitably qualified archaeologist to carry out a fieldwork-based archaeological impact assessment of the proposed development. No sub-surface work should be undertaken in the absence of the archaeologist without his/her express consent.

2. The archaeologist shall carry out any relevant documentary research and inspect the site. The assessment shall involve documentary and cartographic research, an examination of the proposed plans for development, a review of the completed desk-based Archaeological Impact Assessment Report (Horizon Archaeology, EIAR Chapter 12, 31/07/2025), geophysical survey and archaeological testing (licensed under the National Monuments Acts 1930-2014). Test trenches shall be excavated at locations specified by the archaeologist within the proposed development area, having consulted

the site plans, results of geophysical survey and fieldwork, to determine the presence/absence of archaeological remains.

3. Having completed the work, the archaeologist shall submit a written report, including an archaeological impact statement, to the Planning Authority and to this Department in advance of the planning decision. Where archaeological material/features are shown to be present, preservation in situ, the establishment of sufficient 'buffers' to ensure preservation of archaeological remains, review of development layout and design, preservation by record (excavation) or monitoring, may be required and suggested mitigatory measures shall be outlined in the report and the Planning Authority, in consultation with this Department, will advise further with regard to any archaeological requirements following receipt of the assessment.

4. The Planning Authority and this Department shall be furnished with a final archaeological report describing the results of any subsequent archaeological investigative works and/or monitoring following the completion of all archaeological work on site and the completion of any necessary post-excavation work. All resulting and associated archaeological costs shall be borne by the developer.

Reason: To ensure the continued preservation (either in situ or by record) of places, caves. sites, features or other objects of archaeological interest.

Nature Conservation

Appropriate Assessment

There are significant concerns in relation to both the accuracy of the baseline information included in the Natura Impact Statement (NIS), which forms part of the basis for the Appropriate Assessment (AA), and also in relation to the completeness of the AA. This Department considers therefore that the information contained in the NIS is insufficient to support the conclusion that the proposed development will not adversely affect the integrity of any relevant European site.

It should be noted at the outset that the conservation status of qualifying interest (QI) species and habitats and special conservation interest (SCI) Birds, as listed in the AA screening, in almost all cases does not correspond to the status in either the 2017 Article 17 Report[1] (although this has been cited as the source for the species and habitats conservation status) or the Birds of Conservation Concern in Ireland[2] listings (which have been referenced elsewhere in the NIS).

Sources for the local bird population data on which the AA is based appear to be limited to Site Synopses and the recent breeding/winter bird surveys carried out for the proposed development. IWeBS (Irish Wetland Bird Survey) data does not appear to have been consulted. The Ballyteigue Burrow Conservation Objectives Supporting Document[3], although cited in the NIS, does not appear to have been taken into account in assessing the significance of bird usage of the site. For example, there is an apparent contradiction between the "Good" conservation status of Lapwing in the AA screening, and its classification as Highly Unfavourable – Declining in the Conservation Objectives Supporting Document, as well as its Red listing in Birds of Conservation Concern in Ireland.

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, as the occurrence of a post-breeding tern roost at St Patrick's Bridge adjacent to the proposed development site (PDS), for example, has been overlooked. This roost contains SCI tern species from the Lady's Island Lake breeding colony. For example, a significant proportion of Sandwich Terns move westwards from Lady's Island Lake along the coastline after the breeding season[4]. It would also have been expected that the bird surveys would span more than a single year, to produce a more robust dataset.

The following issues, in particular, have not been adequately addressed in the NIS; either because specific impacts have not been considered, or because the proposed mitigation lacks detail or a satisfactory explanation of its effectiveness:

Disturbance to Qualifying Interest species and habitats

Species with high and medium sensitivity to disturbance, including Bar-tailed Godwit (SCI for Ballyteigue Burrow Special Protection Area (SPA) (Site Code: 004020); disturbance distance up to 300m[5]) have been recorded on or adjacent to the site. The proposed mitigation for the construction stage is an acoustic barrier, but no specifications or other details are provided, other than that such barriers are available online. A specific description of the barrier that will be used, and where it will be located, should be included in the NIS.

The main mitigation proposed for recreational disturbance during the operational stage is the implementation of a 100 metre "buffer zone" between the proposed development and the shoreline. However, this zone will contain pathways running close to the shoreline (although not leading directly to the shoreline). Further clarification is needed as to how shoreline

access will be prevented, since the southern boundary will not be defined, according to the landscaping plan.

The delay in timing for the proposed screening planting to mature sufficiently to be effective has not been addressed (noting that in winter its screening potential will be reduced by loss of foliage in deciduous species), nor has the potential for the buffer zone to be reduced by erosion, effectively bringing the pathways closer to the shoreline.

The issue of increased recreational use of nearby sites as a result of the proposed development, and associated risk of disturbance to SCI or QI species and habitats, has been poorly covered. The Saltee Islands Special Area of Conservation (SAC) (Site Code: 000707) QI habitats adjacent to the shoreline (Intertidal reef community complex; Intertidal mudflats and sandflats and their associated community complexes) have not been considered at all, while the impact on QI habitats for Ballyteigue Burrow Special Area of Conservation (SAC) (Site Code: 000696) (including Fixed Dunes, with a national conservation status of Bad-Deteriorating in the 2019 Article 17 report) has not been assessed as significant, since currently trampling is not considered to be the main threat. However, this does not take account of any projected future increase in recreational use of the site. The potential for increased recreational traffic to the Saltee Islands Special Protection Area (SPA) (Site Code: 004002) and consequent risk of increased disturbance to breeding seabirds as a result of the proposed development has not been addressed, nor has the increased potential for disturbance to Grey Seals as a result of more frequent boat traffic to the Saltee Islands. As already mentioned, the potential *ex situ* effects on Lady's Island Lake Special Protection Area (SPA) (Site Code: 004009), particularly post-breeding tern roosts, have not been considered.

While there is at the moment less recreational use of the shoreline area in winter, as mentioned in the NIS, there is significant potential for an increase in winter use from the current winter levels, if the proposed development remains open throughout the winter. It is noted that the Draft Wexford Destination and Experience Development Plan[6] includes year-round tourism as a Strategic Goal (Strategic Objective 1). The potential impacts on the availability of the beds of Eelgrass (*Zostera*) adjacent to the shoreline here for foraging waterbirds, in the event of increased recreational use of the shoreline, should be addressed.

Collision risk

The computer-generated images of the southern elevation of the main block of the proposed development appear to contradict the description of the use of visual heterogeneity in the building ensuring the lack of large expanses of glass. This Department considers that the proposed design of the southern elevation represents a significant collision risk and is in

marked contrast with the northern elevation. There appears to have been little attempt to incorporate specific design features on the southern elevation to minimise the collision risk[7].

Although gull species were observed flying over the site during the bird surveys, no information has been provided on species-specific flight paths in the vicinity of the proposed development. In addition to migration flights, these may include daily movements between foraging and roosting areas as well as movements in response to the tidal cycle and are likely to be at a lower height than long distance migration flights. Local flight route data should be an important component of species-specific and site-specific collision risk modelling.

Lighting

Although the use of bird-friendly external lighting is proposed as mitigation, the development will lead to a significant source of lighting along this stretch of coastline. The building height and design, with extensive use of glass on the southern elevation, means that the cumulative effect of internal building lighting is likely to have equal if not greater significance than external lighting in terms of its disorientating effect on seabirds. This cannot be mitigated by screening planting due to the height of the upper storeys and therefore mitigation in the building design would have been expected. The fact that balcony lighting is included at all in the design (even if the default setting is "off") will exacerbate the lighting issue. The issue of disorientation of SCI birds of the Saltee Islands SPA and the Seas off Wexford candidate Special Protection Area (cSPA) (Site Code: 004237) has been previously raised as a concern by this Department and is discussed as a potential negative impact in the NIS, but has not been adequately mitigated.

Loss of ex situ foraging habitat

The proposed development will result in the loss of winter foraging habitat for SCIs of the Ballyteigue Burrow SPA. The SPA consists of dune habitats adjacent to the shoreline, as does Tacumshin Lake Special Protection Area (SPA) (Site Code: 004092) further to the east, therefore the PDS contains conveniently-situated coastal fields for both SPAs. for winter foraging. The proposed mitigation for habitat loss (creation/retention of a wetland area together with low mound landscaping), is unlikely to be attractive for winter foraging birds, which prefer an open aspect with a wider view to allow early detection of any threats. The proposed wetland area is in close proximity to the pathways and some buildings, and details are required of how access from the pathways and disturbance will be prevented.

Coastal erosion

The photographic record in the Preliminary Coastal Erosion Assessment clearly shows an actively-eroding coastline adjacent to the southern boundary of the PDS. Almost all of the photos show recently exposed bare soil caused by slippage of the bank; of the few that do

not, evidence of bank slippage can be inferred from the overhanging vegetation curtain in almost all cases. The predicted erosion line shown adjacent to the proposed development is for a five-year scenario (2030), so that this time period may have already elapsed by the time the development is operational. Therefore expert longer-term erosion modelling is required. It is noted that the 2050 erosion line has been shown only to the east of the development site; however, this Department considers that the modelling for 2050 (at least) will need to include the proposed development itself, as well as further west towards Ballyteigue Burrow. The potential for progressive reduction of the 100 metre "buffer" zone between the development and the shoreline due to erosion will need to be addressed, as will the potential for accelerated coastal erosion of QI habitats at Ballyteigue which may be rendered less resilient due to pressure from an increased level of recreational use. The NIS should address these issues, taking longer-term modelled predictions into account.

Invasive species

While recommendations have been made for invasive species control on site, these are not specific; but rather constitute a general discussion on approved methods. An Invasive Species Management Plan is required in order to ensure the long term effectiveness of the proposed control methods.

Wastewater treatment plant capacity

Wexford County Council must be satisfied that the timescale for the proposed phased expansion of the Wastewater treatment plant will be in keeping with its projected peak capacity loading as a result of the cumulative effect of the current development operating at its peak capacity, the general population usage during the peak season, and loadings from other proposed developments in the area. It would be very important that the expanded capacity would be operational in advance of any potential exceedance of its current capacity loading.

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. In addition, the NIS has not addressed potential impacts on Lady's Island Lake SPA. 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.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) referrals@npws.gov.ie, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Is mise, le meas

Anne-Marie Bradley

Anne-Marie Bradley
Development Applications Unit
Administration

[1]NPWS (2019). The Status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Overview. Unpublished NPWS report.

[2]Gilbert, G; Stanbury, A and Lewis, L (2021) Birds of Conservation Concern in Ireland 4: 2020 – 2026. Irish Birds 43: 1 – 22

[3]NPWS (2014) Ballyteigue Burrow Special Protection Area (Site Code 4020) Conservation Objectives Supporting Document Version 1

[4]Murray, T., Walsh, A., and Daly, D.(2020) Post-fledging dispersal of juvenile Sandwich Terns from Lady's Island Lake, County Wexford, Ireland. Ringing & Migration, 35:1, 16-20. DOI: 10.1080/03078698.2021.2001675

[5]NatureScot (2022) Disturbance Distances in selected Scottish bird species. NatureScot Guidance.

[6]Fáilte Ireland (2025) Wexford Destination and Experience Development Plan (Draft)

[7]American Bird Conservancy (2015) Bird-Friendly Building Design

Coastal erosion cause for concern among Wexford residents

Updated / Wednesday, 10 Apr 2024 10:40



Many stretches of the Irish coastline are prone to erosion

There have been renewed demands for action to be taken to protect vulnerable parts of Ireland's coast, following further damage wreaked by the stormy weather of recent days.

Many stretches of the Irish coastline are prone to erosion because of their sandy nature, particularly during windy spells, while climate change and its consequent effects of more frequent storms and rising sea levels has exacerbated the problem.

One length of south Co Wexford shoreline which has been battered several times in recent years took another hit at the weekend due to Storm Kathleen.

Up to three metres of cliff land fell into the sea.

At Sea View, close to Rosslare and Kilmore Quay, a fourth access route to serve a group of houses called Connibeg Cottages and Lismore Cottages was installed by Wexford County Council (WCC) less than two years ago, but is now out of commission because of erosion, while the development has heightened worries about the future of the houses themselves.

Andrew Grant has lived in Connibeg Cottages with his family for several years.

"At the beginning it wasn't so bad with the coastal erosion, but the last three, four years now have just ramped up, year after year after year," Mr Grant said.



Mr Grant said erosion is a cause of concern for his entire family

He said: "The effect being we're losing a lot of land.

"We're on our fourth road now, so our road is destroyed, and we're very worried about losing the house, being homeless."

Rock protection works carried out by WCC and the Office of Public Works (OPW) over two years ago stopped the sea from getting too close to the cottages themselves, but the scale and pace of erosion means they could come under further threat in the years to come, if it continues unabated.

This issue is a cause of concern for residents including Mr Grant.

"To have a home for my family, to be able to have somewhere to work and bring in an income, and for my children, I'm worried as well about this erosion, it plays on their minds as well," Mr Grant said.

"They worry about losing their house, they worry about having to go somewhere else, that they'll have to change friends," he said.

"It's a big, big worry. It affects not just me, but the family in general," he added.

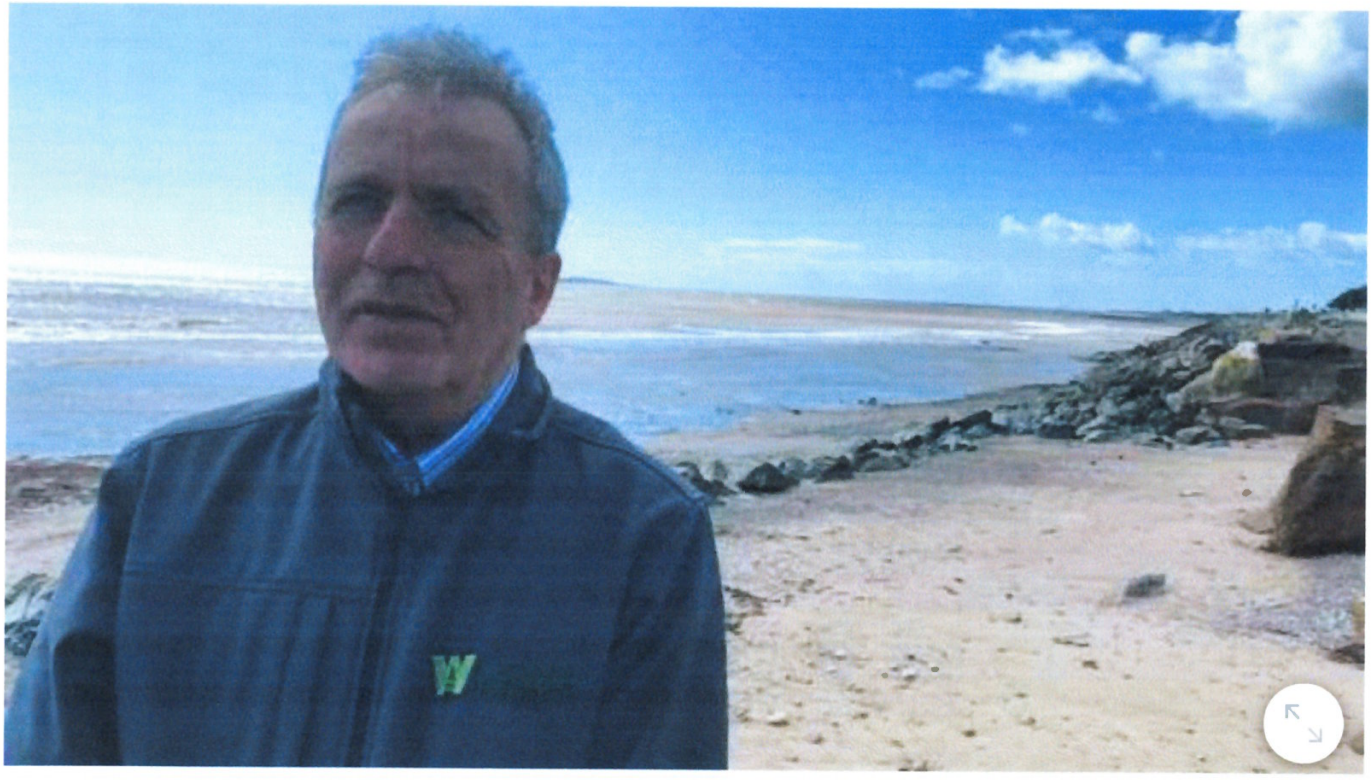


Mr Forde said over the weekend 'three metres at the edge of the access road' had been lost

Senior engineer with WCC Ger Forde said the average loss of coastline over the years was about half a metre per year, but in recent times this has increased significantly.

"Over the weekend here, we lost about three metres at the edge of the access road and the access road to seven of the houses here has gone," he said.

Storm activity during the last number of years has increased, bringing more erosion to soft coasts such as south Wexford.



Mr Forde said residents have 'a major concern' about the impact future erosion can have

Read more: [Storms adding to Ireland's coastal erosion problem]

"We can see the effects of climate change here in Wexford with the frequency of storms and the intensity of them, and we have specific objectives in our climate action plan to deal with both mitigation and adaptation." Mr Forde said.

He said that work has "achieved the objective of protecting houses" to date, but local residents have "a major concern" about the impact future erosion can have.

"We're prioritising areas where there's public infrastructure like public roads and also houses," he said.



Ms McDonald said the coastline is 'very vulnerable'

Local Fianna Fáil county councillor Lisa McDonald said the storms hitting the southeast coast lately are of the intensity which used to be associated only with the southwest of the country.

Ms McDonald said: "Our coastline here is not rocky, it's very vulnerable, it's very soft, very soft soil.

"We've been known for our golden beaches but now we're seeing large chunks of our coastline being eaten up by each storm.

"Here today, you can see in Sea View the results of Storm Kathleen."

Planning permission was granted to the council yesterday for further rock armour work, to add to the protection work carried out two years ago, but it now needs to go to tender.

"The process is too slow," Ms McDonald said.

"We need the OPW to keep the speed up because climate change has sped up and if it doesn't keep pace with climate change, we'll see large chunks disappear into the sea," she added.

More from RTÉ On Climate.

CLIMATE

Privacy

ted from RTE.ie

The Saltee Islands

Saltee Islands


Atlantic Puffin

Marine wonderland

Easily accessible and supporting twelve species of breeding seabirds in summer, the Saltee Islands are one of the best known and most popular bird islands in Ireland. In addition to the sights, sounds and smells of the seabird cities in high summer, a visit to the islands brings the diverse mixture of pleasures of time spent on the sea, impressive cliff scenery, wild flowers in bloom, the magic of a world apart, a Grey Seal rookery, outstanding marine life in the surrounding waters, and the ever-present possibility of experiencing something new, unusual or exciting.

Some basic facts

The Saltee Islands complex comprises two islands, several adjoining nearshore and offshore islets and sea rocks and a large area of surrounding seabed. The two islands are called Saltee Island Great, the large island on the right when viewed from the mainland, and Saltee Island Little.

The islands are located in the Celtic Sea off Kilmore Quay on the sunny south coast of County Wexford[1].

* **Saltee Island Little** lies about 3.8km south of Kilmore Quay and has an area of about 37ha. The island is whale-backed in shape with low cliffs on its shores and rising to over 30m along its centre.
* **Saltee Island Great** lies about 6km from Kilmore Quay, has an area of about 89ha, and is wedge-shaped. Saltee Island Great ascends from a low shore on the mainland side to 20-30m high cliffs on its south-eastern side[2]. It rises to an altitude of 58m at its southern summit.

The foundation of rock

The Saltees are composed of a fine, pinkish-brown granite. The Saltee Granite extends over a large oval area of seabed. Formed some 436 million years ago during the Silurian Period of geological time, the granite is one of several intrusives that cored the centre of the former Caledonian Mountains[3].

Placename

The name 'Saltee' is interpreted as a combination of the English word 'Salt' and the Norse suffix '-ey' meaning island[4]. In stormy weather, the islands are regularly drenched with spray.

Human habitation

Both islands are privately owned or occupied. Saltee Island Great was farmed in the past but agricultural activities ceased in 1943. At harvest time, the larger island supported a community of some twenty people[5 & 6]. The island is now largely overgrown with dense stands of Bracken and impenetrable thickets of Bramble scrub. Farming on Saltee Island Little ceased in 1946 but resumed in 1999[7] and still continues. Raising Kerry cows, Fallow Deer and Soay Sheep are the main enterprises.

Saint Patrick's Bridge

Allegedly constructed by Ireland's national apostle, Saint Patrick's Bridge is a long ridge of shingle stretching out from the mainland shore towards Saltee Island Little. The landform is interpreted as a glacial moraine: a mass of cobbles, boulders and fine sediment carried by, and deposited by, an ice sheet during the last glaciation[8]. At low water, the ends of the bridge may be seen jutting out from the townland of Nemestown on the mainland and from the north-eastern corner of Saltee Island Little. St Patrick's Rock is one of several large, named glacial erratics of Carnsore Granite scattered along the seashore on the eastern side of the bridge. These erratics were moved about and deposited by ice as it flowed south in the basin of the Irish Sea during the last glaciation[9].

Celtic Sea Front

The Celtic Sea Front is the boundary that forms in summer where the shallower, mixed waters of the Irish Sea meet the deeper, layered waters of the Celtic Sea[10]. The frontal system meanders along a line stretching from the Saltee Islands to the coast of Wales. Upwellings along the thermal front cause plankton to bloom triggering the development of food chains that end in large predatory fish, seabirds, porpoises, dolphins and whales.

Wild flowers in bloom

278 species of wild plant were recorded on the Saltee Islands by visiting botanists up to 30 June 2022[11]. Changing hues give the islands a unique beauty as different species dominate the palette as it changes with the seasons. Parts of the islands turn blue in spring when the understory of Bluebells flowers.


Bluebells blooming in springtime on Saltee Island Great.

Later, yellows merge with the fading blues as Wild Turnip flowers. Greens dominate when Bracken is in full leaf. Reds provide an early autumn glow as Common Sorrel fruits and browns take over in late autumn as the Bracken dies down.

Butterflies and moths

In early summer the Saltees are a welcome and important landfall for migrant butterflies and moths moving into Ireland from Britain and mainland Europe. Regularly recorded species include Red Admiral, Painted Lady, Silver-Y, and hawk moths.

Unusual life forms

Basking Sharks, the second largest fish in the world, Sunfish, oceanic jellyfish and Leatherback Turtles have been spotted in waters around the islands on rare occasions.

Text and photos: Jim Hurley, SWC Promotions, Grange, Kilmore, Co Wexford Y35 YN35.
Email: southwexfordcoast@gmail.com. Mobile: 086 163 7199. A copy of this leaflet, saved as a PDF file, can be downloaded at www.southwexfordcoast.com. Version: 202306.
SWC Promotions: promoting the natural heritage resource values of the South Wexford Coast.



Wild Birds

While the Saltees are famous for their seabirds, some forty species of other birds have been recorded breeding on the islands[5]. These range from such well-known garden favourites as the Blackbird and Robin to the rarer Peregrine Falcon, Raven and Chough.

Due to their location at the south-eastern corner of Ireland, the islands are ideally located as a landfall for migrants arriving into Ireland in springtime from Britain and mainland Europe. In May, the islands are regarded among the very best sites in Ireland for seeing spring migrants and vagrants; consequently, long lists of rarities have been compiled [12&13]. The autumn migration is less spectacular with September being the best month.

May, June and July are the best months to visit to see seabirds.

Bird observatory

Ireland's first bird observatory was operated by Robin Ruttledge and John Weaving on Saltee Island Great from 1950 to 1963 by kind permission of the land owner: Michael Neale, Prince Michael the First. The importance of the island as a landfall for migrants was established and documented[14].

With the continued support of the land owners, researchers from several universities, the government's National Parks and Wildlife Service (NPWS), BirdWatch Ireland, and others, conduct on-going surveys and research with regard to migrants, breeding seabirds, and other wildlife. As a result, the Saltees are one the best documented islands in Ireland.

Breeding seabirds

Twelve species of seabirds regularly breed on the Saltee Islands. These birds normally spend their lives at sea but have to come to land to nest. Once their young have fledged many of the birds leave the Saltees and do not return until the following summer breeding season.

The summer colonies on the Saltee islands are rated of international importance because together they comprise an assemblage of over 20,000 breeding seabirds[15].

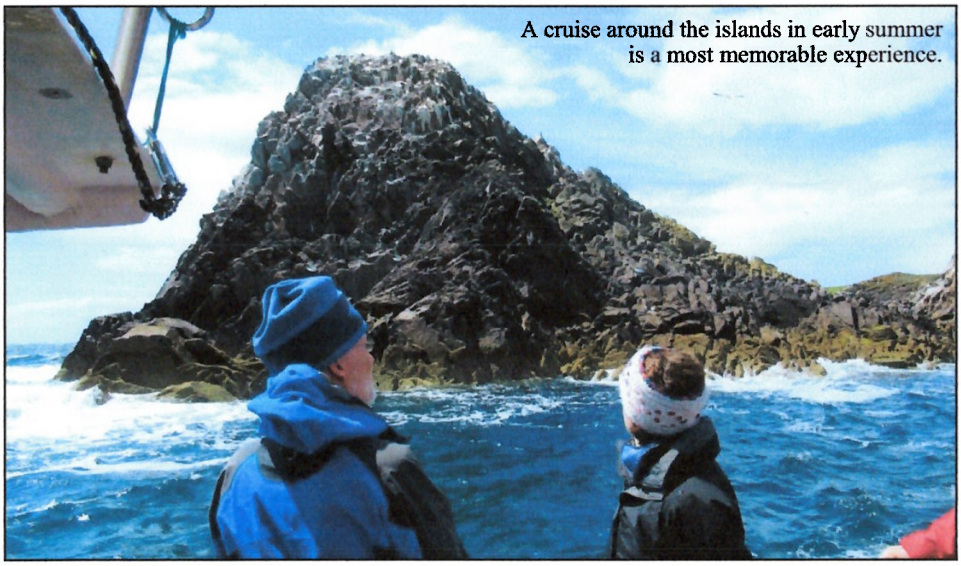
The following very brief introductory notes to the twelve species of breeding seabirds refer to adult birds in breeding plumage as seen during the nesting season. Population sizes are taken from the most recent published data[16] together with earlier sources where applicable.



The Common Guillemot is the most numerous breeding seabird on the Saltee Islands. The birds don't build a nest; females lays one pear-shaped egg on a rock ledge.

Twelve breeding seabirds

1. The **Northern Fulmar** is related to the albatross. It glides at length on stiff, straight wings and floats on up-draughts along the cliffs. Unlike the four resident species of breeding gulls it does not have black-and-white patterned wing-tips. It also differs from the gulls in that it is off-white in colour, has a large head, a dark eye smudge, a tube-nose, a short thick neck, and a grey tail. 357 pairs (190 on Saltee Island Great and 167 on Saltee Island Little) nested (2015-2018)[16]. The population is declining.
2. **Manx Shearwaters** are long-winged birds that are rarely seen in small flocks at sea near the islands during the daytime. They are black above and white below and have a characteristic switchback flight forming alternative black and white cross-shapes as they fly low shearing the wave crests. They breed underground and come ashore only under cover of darkness. The population size on Saltee Island Little is estimated at 718 pairs[17]; the population on Saltee Island Great has not yet been fully censused.
3. The goose-sized **Northern Gannet** is Ireland's largest seabird. Breeding adults are white with black wing tips and a tinge of yellow-buff on their heads. They plunge -dive diagonally from a height and 'fly' underwater catching surface-shoaling fish. They nest on Saltee Island Great only, occur at two main sites (the Makestone and Cat Cliff) and their numbers continue to increase steadily: 4,722 pairs (2013-2014)[16].



A cruise around the islands in early summer is a most memorable experience.

Cormorants and Shags are somewhat similar birds and are consequently easily confused.

4. The **Great Cormorant** is bigger (77-94cm long), has a blue and bronze gloss and white cheek and thigh patches. It also has a thick bill, a thick neck and a low, flat head. 208 pairs bred on Saltee Island Little (2015-2018)[16]. The birds colonised Saltee Island Great in recent years and numbers continue to grow there in tandem with declining numbers on Saltee Island Little.
5. The **European Shag** is smaller (68-78cm long) and slimmer and has an oily, green, glossy sheen. It has a thin bill, a snake-like neck, a steep fore-head and bright emerald -green eyes. They breed on both islands; 112 pairs on Saltee Island Great (2015-2018)[16].

Gulls are a well-known family of seabirds. Four species breed on the Saltees. Gull species that scavenged at landfill sites on the mainland suffered a catastrophic botulism-induced decline in numbers in the late 1990s. However, numbers are slowly recovering.

6. The **Lesser Black-backed Gull** is medium -sized (48-56cm), has a dark slate-grey back, bright yellow-ochre legs, bright orange eye-ring, and a gentle expression . They breed on both islands; 251 pairs on Saltee Island Great (2015-2018)[16].
7. The **Herring Gull** (54-60cm) is the quintessential 'seagull'. It has a pale grey back and pale flesh-pink legs. Its eye-ring is yellow or pale orange. They breed on both islands; 115 pairs on Saltee Island Great (2015-2018)[16] recovering from a crash from a peak population of some 1,450 pairs in the late 1980s.
8. The **Great Black-backed Gull** is the biggest (61-74cm long) of the four regular breeders. It has a black back, a very heavy bill, pale pink legs and a red eye-ring that gives its face a rather fierce expression. About 150 pairs breed on both islands.
9. The **Black-legged Kittiwake** is the smallest (37-42cm) of the four gulls and is the only one with black legs and black eyes. Its legs are also very short. It nests on the cliffs where it repeatedly calls its name: 'kit-ti-week; kit-ti-week' in a rhythmic nasal voice. The species is absent from Saltee Island Little but it formerly bred there; 1,038 pairs bred on Saltee Island Great. (2015-2018)[16].

The three members of the Auk family are black-and-white. The stubby-tailed auks may be thought of as the penguins of the northern hemisphere. Size and bill shape are good field marks for telling the trio apart.

10. The **Common Guillemot** is the biggest (38-46cm) of the trio, is more dark-chocolate-brown than black in colour and has a slender, pointed bill (see image above). It is the most numerous seabird found on the Saltees. 25,851 birds bred on Saltee Island Great (2015-2018)[16]. They lay single eggs directly on rocky ledges without building any nest (image page 2). The species is a very recent coloniser on Saltee Island Little.
11. The **Razorbill** is not significantly smaller (38-43cm) than the Common Guillemot but is heavier-billed, squatter and has a

thicker neck. It is jet black and has a flattened bill like a cut-throat razor ('razor-bill') with white lines on it. A white stripe on the bill is linked to a white line running from the bill to the dark brown eye. 6,519 pairs (5,669 on Saltee Island Great and 850 on Saltee Island Little) nested (2015-2018)[16]. The population is rising steadily.

12. The **Atlantic Puffin** is significantly smaller (28-34cm) has a big head, a parrot-like colourful bill, large white cheek patches and bright orange legs (see image on page 1). Puffins nest in underground burrows. The estimated population on Saltee Island Great suffered a dramatic decline (from 1,522 pairs in 1998-2002 to 120 pairs in 2015-2017) whereas the population on Saltee Island Little remained relatively stable (300 pairs in 1998-2002 and 270 pairs in 2015-2017)[18 and 19].

Land mammals

Land mammals recorded on Saltee Island Great include Pygmy Shrew[5 & 15], unidentified bats, Rabbit, and Eurasian Otter. An animal dropping found in 2011 was believed to be an American Mink scat[20]. To protect the seabirds, Brown Rats were exterminated on Saltee Island Great by the National Parks and Wildlife Service in the winter of 2020[19].

Whales and dolphins

The Saltees are regarded a hotspot for seeing whales and dolphins. The cliff-tops provide excellent vantage points for scanning the surrounding coastal waters. Small groups of Risso's Dolphin are regularly seen in summer. Harbour Porpoises and Common Dolphins are occasionally spotted. Minke Whales, Killer Whales and Fin Whales have been recorded[21].

Grey Seals rookery

The Saltee Islands are among the top five Grey Seal breeding sites in Ireland.

About 120 pups are born each autumn at some twenty-five pupping sites on both islands. The pupping season extends from August to December.

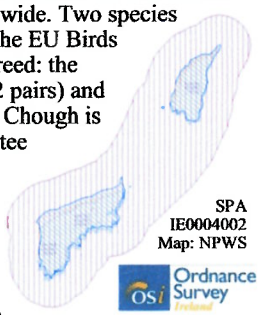


Grey Seal pup.

Pup mortality varies from year to year depending on both the severity of the gales that often occur during the pupping season and the level of disturbance caused by the presence of people on the pupping beaches[22].

Nature conservation

The Saltees are internationally important for supporting an assemblage of over 20,000 breeding seabirds. The two islands have been a Special Protection Area (SPA) for wild birds since 1985. The objectives for the SPA are to maintain or restore the favourable conservation condition of listed species of seabirds. The protected area for birds includes the two islands, the sound between them and a surrounding skirt of nearshore sea and seabed approximately 500m wide. Two species listed on Annex I of the EU Birds Directive regularly breed: the Peregrine Falcon (1-2 pairs) and Chough (1 pair). The Chough is significant in that Saltee Island Great is the eastern edge of its Irish range. Full details with regard to the SPA together with site descriptions, maps, etc., are available online[15].



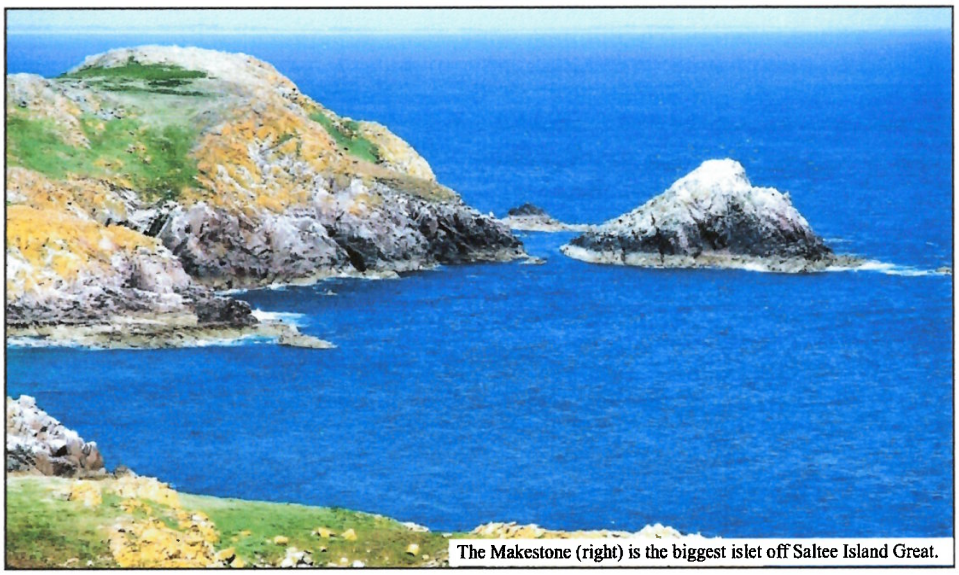
SPA IE0004002 Map: NPWS

Ordnance Survey

The islands and a large area of surrounding seabed are also a Special Area of Conservation (SAC) for their habitats and the marine life that these habitats support. With an area of 15,809ha, the SAC extends to, and includes part of, the mainland shore. The site is of high conservation importance for marine habitats, with reefs, sea caves, large shallow bays, and intertidal sediments all well represented. Reefs are large areas of exposed rock either on the seabed or on the seashore. They are important habitats for wildlife. The very extensive underwater reefs around the Saltees are exceptionally rich in marine life. They support excellent examples of the communities of tide-swept areas and areas subject to sand scour. The range of colonial sea squirts present is particularly notable. Full details with regard to the SAC together with site descriptions, maps, etc., are available online[23].



SAC IE0000707 containing SPA IE0004002. Copyright Permit MP 0004813.© Ordnance Survey Ireland / Government of Ireland.



The Makestone (right) is the biggest islet off Saltee Island Great.

The great wealth of marine life and the presence of several wrecked ships attracts scuba divers to the area. Members of Wexford Sub Aqua Club maintain their boathouse at Kilmore Quay and their website includes a guide to the best dive sites on the South Wexford Coast[24].

Visiting the Saltee Islands

Both islands are privately owned or occupied. Landing on Saltee Island Little is hazardous and as it is a working farm, permission to visit is required.

Day visitors to Saltee Island Great are welcome and permission to land, courtesy of the owners, the Neale family, is not needed[6]. However, the owners of the island kindly request day visitors to respect the following three rules: (1) day visitors are allowed between the hours of 11:30am and 4:30pm only, (2) dogs, drones, camping, and the lighting of fires are all forbidden, and (3) privacy should be afforded to the owners by not approaching their house[6].

Those hiring a boat to get to Saltee Island Great, or paying for a place of a boat, should be aware that the onus is on them to ensure that the crafts they travel on are properly licensed and insured and that adequate safety precautions are in place.

There is no pier on the island. Landing is wind-dependent and involves offloading at sea from the ferry boat into a dingy to go ashore to disembark, depending on the state of the tide, on either a sandy beach, a mass of wet seaweed, or over slippery, seaweed-covered rocks . Landing is at your own risk.

Once ashore, there are no facilities or shelter on the island.

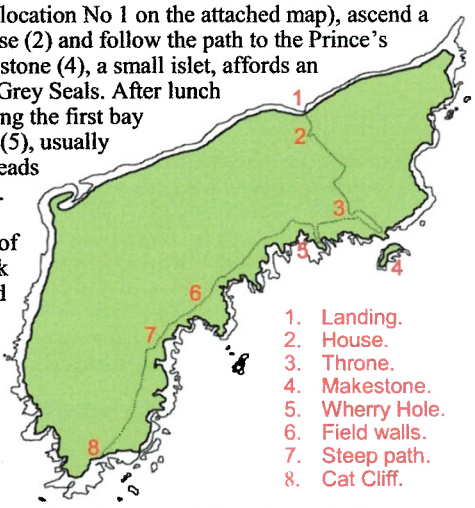
Weather and sea conditions permitting, cruises around the islands to see and enjoy the scenery, seabirds, and seals are offered by a number of licensed charter boats operating out of Kilmore Quay marina.



Kerry cattle grazing on Saltee Island Little.

Self-guided tour around Saltee Island Great

Those who disembark at the landing on Saltee Island Great (location No 1 on the attached map), ascend a flight of steps up the low cliff, pass close to the owners' house (2) and follow the path to the Prince's stone throne (3). A detour to the cliffs overlooking the Makestone (4), a small islet, affords an immediate view of several species of breeding seabirds and Grey Seals. After lunch on the Rabbit-grazed lawn by the throne, the cliffs surrounding the first bay west of the throne, near the cave known as the Wherry Hole (5), usually afford good views of Atlantic Puffins. A well-trodden path leads the visitor on a trek to the south-western corner of the island. The tops of the stone walls (6) surrounding the former agricultural fields afford good views of large gulls. The end of the stone walls marks the start of a steep path (7) up the flank of the South Summit from which excellent views may be had looking back along the axis of the island to Saltee Island Little and the mainland with Carnsore Point in the distance (image below). The path ends at Cat Cliff (8) that, together with the surrounding cliffs, support the main colony of Northern Gannets. These big, noisy birds favour this spot as the combination of the prevailing south-westerly winds and the tall cliffs provide good lift for take-off and landing. Return to the landing via the same route. The round trip is only about 3km long but, allowing for frequent leisured stops, it can take most of the visit to complete.



Country Code

Please help conserve the biodiversity of the Saltee Islands by following the Country Code

- Leave Saltee Island Great as you found it. Do nothing to destroy the wonderful amenity you have come to enjoy. Stay on the paths. Kill nothing but time; take nothing but photographs and memories.
- Pay careful attention to the cliff edges; the ground may be unsafe and may give way. Stay back at least your body length. Remember you are in a remote location; if needed, help may be slow to arrive.
- Please take your rubbish home with you. Leave nothing but footprints.
- If you are a photographer, help conserve the breeding birds by not driving them off their nests in an attempt to get close-up photographs. Disturbance significantly reduces the birds' breeding success.
- Give Grey Seal pups a wide berth in autumn for fear their mothers might desert them.
- Beware of 'tame' Grey Seals in Kilmore Quay harbour. They can give a nasty bite if they mistake a hand trailing in the water for an offering of food.
- The protected wildlife areas are managed by the National Parks and Wildlife Service (NPWS). If you see any threats to nature conservation report your concerns to Tony Murray, the local NPWS Conservation Ranger, email Tony.Murray@npws.gov.ie, telephone 01 539 3212 . Thank you.

Sources, references and further reading

1. Ordnance Survey of Ireland. Discovery Series. Sheet 77. South-east Wexford. Scale: 1:50,000.
2. Ordnance Survey Ireland map viewer at https://webapps.geohive.ie/mapviewer/index.html.
3. Tietzsch-Tyler, D., and Steeman, A. G. 1994. *Geology of South Wexford*. Dublin: Geological Survey of Ireland.
4. Ó Crualaoich, C. and Mac Giolla Chomhghaill, A. 2016. *Townland Names in Co. Wexford*. Number 4 in the Logainmneacha na hÉireann series. Two volumes: Volume 1 (A-F) and Volume 2 (G-Y). Dublin: Placenames Branch, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs. Page 1529,
5. Roche, R., and Merne, O. 1977. *Saltees - Islands of birds and legends*. Dublin: The O'Brien Press Ltd.
6. Owners' website at www.saltees islands.info.
7. Grattan Bellew, H. 2003. *A Pinch of Saltee*. Justin Nelson Publications.
8. https://gsi.geodata.gov.ie/downloads/Geoheritage/Reports_WX040_St_Patricks_Bridge.pdf.
9. Ó Cofaigh, C., Telfer, M. W., Bailey, R. M. and Evans, D. J. A. 2012. Late Pleistocene chronostratigraphy and ice sheet limits, southern Ireland. *Quaternary Science Reviews*, Number 44, pages 160-179.
10. ICES. 2007. *Report of the Working Group for Regional Ecosystem Description (WGRED), 19 -23 February 2007*. Copenhagen: International Council for the Exploration of the Sea (ICES) Headquarters.
11. Green, P. 2022. *Flora of County Wexford*. Self published. Page 28 of 595.
12. Milne, P., and Hutchinson, C. 2009 (Second edition). *Where to watch birds - Ireland*. London: Christopher Helm.
13. Dempsey, E., and O'Cleary, M. 2007. *Finding Birds in Ireland: The Complete Guide*. London: Gill and Macmillan.
14. Ruttledge, R.F. 1965. Migrant and other birds of Great Saltee, Co. Wexford. *Proceedings of the Royal Irish Academy* Volume 63B, pages 71 -86.
15. https://www.npws.ie/protected-sites/spa/004002.
16. Cummins, S., Lauder, C., Lauder, A. and Tierney, T. D. 2019. The Status of Ireland's Breeding Seabirds: Birds Directive Article 12 Reporting 2013-2018. *Irish Wildlife Manuals*, No. 114. Dublin: National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht. Available online at https://www.npws.ie/sites/default/files/publications/pdf/IWM114.pdf.
17. O'Halloran, J., Kelly, T. C., Quinn, J., Irwin, S., Wilson, M. W., and Smiddy, P. 2013. Current ornithological research in Ireland: sixth Ornithological Research Conference, UCC, November 2013. *Irish Birds*, Volume 9, Number 4, page 675.
18. Arneill, G. E. 2018. *Developing and assessing methods to census and monitor burrow-nesting seabirds in Ireland*. PhD Thesis, University College Cork. Available online at https://cora.ucc.ie/items/5cc8a99a-81f7-4ed3-96c2-c6bf720e445a.
19. https://ec.europa.eu/environment/nature/natura2000/platform/events/pdf/4.%20Saltee%20Islands%20Biosecurity_Tierney.pdf.
20. BirdWatch Ireland website at www.birdwatchireland.ie/Publications/eWings/eWingsIssue23August2011/AmericanMinkposenewthreat/tabid/1196/Default.aspx.
21. Irish Whale and Dolphin Group online database at www.iwdg.ie/iscope/sightings/.
22. Ó Cadhla, O., Strong, D., O'Keeffe, C., Coleman, M., Cronin, M., Duck, C., Murray, T., Dower, P., Nairn, R., Murphy, P., Smiddy, P., Saich, C., Lyons, D., and Hiby, A. R. 2007. An assessment of the breeding population of grey seals in the Republic of Ireland, 2005. *Irish Wildlife Manuals* No. 34. Dublin: National Parks and Wildlife Service. Available online at www.npws.ie/publications/irishwildlifemanuals/IWM34.pdf.
23. https://www.npws.ie/protected-sites/sac/000707
24. Website of Wexford Sub Aqua Club at www.divewexford.org/.



View east from the South Summit on Saltee Island Great.

390 WEXFORD BUS connect

Route 390

Wexford to/from Kilmore Quay via Piercestown

390 WEXFORD > KILMORE QUAY

	M-Sa	M-Sa	M-Su	M-Su	M-Su	M-Sa
Wexford Town (Redmond sq)	**07:00**	**08:25**	**11:30**	**13:30**	**15:30**	**17:35**
Wexford Town (Commercial Quay)	07:01	08:26	11:31	13:31	15:31	17:36
Wexford Town (Paul Quay)	07:01	08:27	11:32	13:32	15:32	17:37
Wexford Town (Trinity St)	07:02	08:28	11:33	13:33	15:33	17:38
Wexford Town (Upper William Street)	07:03	08:28	11:33	13:33	15:33	17:38
Maudlintown	07:04	08:29	11:34	13:34	15:34	17:39
Kerlogue Cross	07:04	08:29	11:34	13:34	15:34	17:39
Kerlogue Business Park	---	08:30	11:35	13:35	15:35	17:40
Drinagh (KD Garage)	---	08:30	11:35	13:35	15:35	17:40
Piercestown (St Martins)	---	08:37	11:42	13:42	15:42	17:47
Johnstown Castle (Grounds)	---	08:40	11:45	13:45	15:45	---
Johnstown Castle (Front Gate)	---	---	---	---	---	17:50
Murrintown	07:12	08:45	11:50	13:50	15:50	17:55
Bridgetown (Bargy Bar)	07:20	08:55	12:00	14:00	16:00	18:05
Kilmore Village (Opp Post Office)	07:23	09:00	12:05	14:05	16:05	18:10
Kilmore Quay (Post Office)	07:28	09:10	12:15	14:15	16:15	18:20
Kilmore Quay (Marina)	**07:30**	**09:15**	**12:20**	**14:20**	**16:20**	**18:25**

390 KILMORE QUAY > WEXFORD

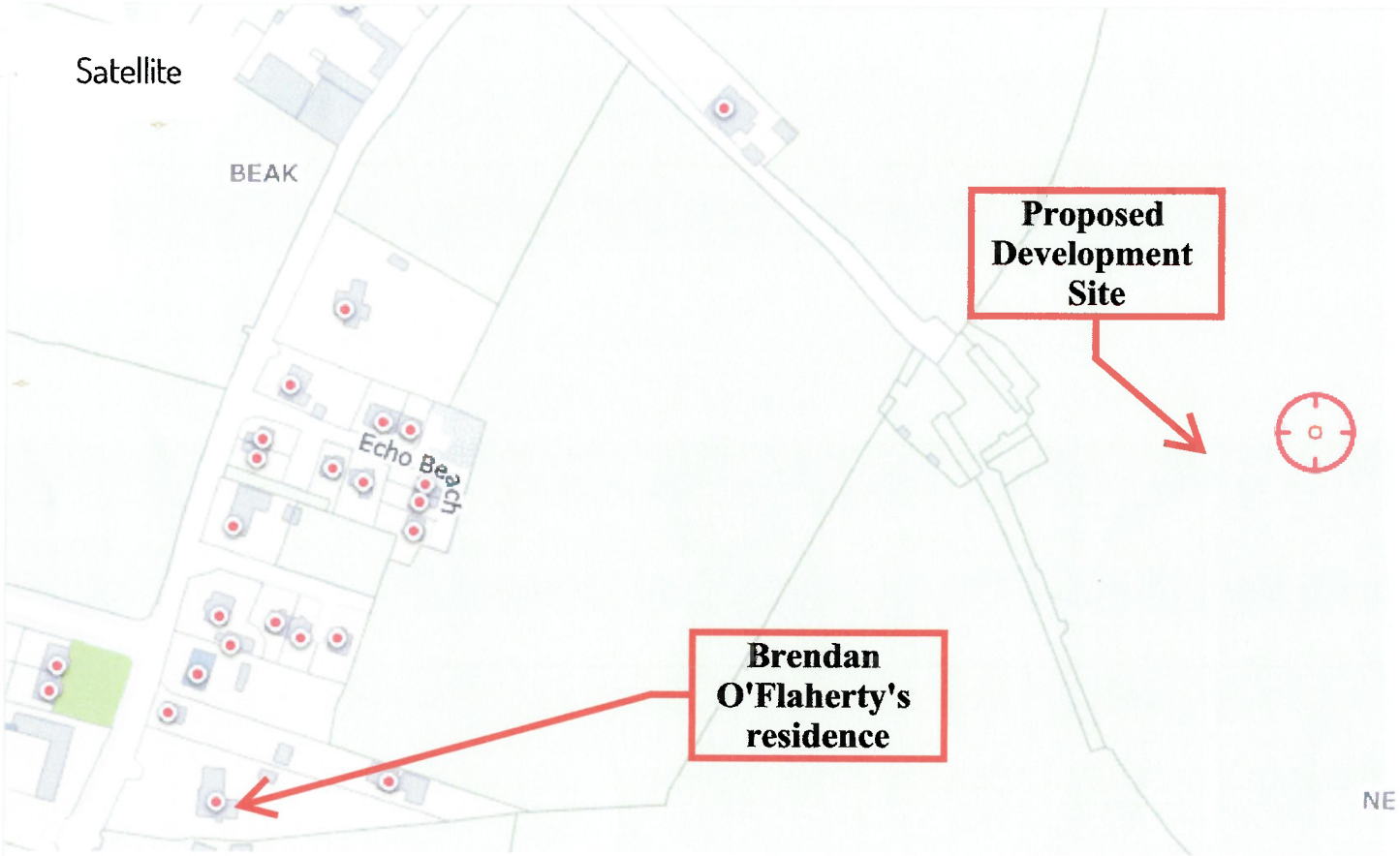
	M-Sa	M-Sa	M-Su	M-Su	M-Su	M-Sa
Kilmore Quay (Marina)	**07:35**	**09:30**	**12:30**	**14:30**	**16:30**	**18:30**
Kilmore Quay (opp Post Office)	07:36	09:31	12:31	14:31	16:31	18:31
Kilmore Village (Post Office)	07:43	09:38	12:38	14:38	16:38	18:38
Bridgetown (Bus stop)	07:47	09:42	12:42	14:42	16:42	18:42
Murrintown (opp cemetry)	07:55	09:50	12:50	14:50	16:50	18:50
Johnstown Castle (Bus Stop_	---	09:55	12:55	14:55	16:55	---
Piercestown (opp St Martins)	08:03	09:57	12:57	14:57	16:57	18:55
Drinagh (IDA Business Park)	08:10	10:05	13:05	15:05	17:05	19:05
Kerlogue Business Park (opp Cinema)	08:11	10:06	13:06	15:06	17:06	19:06
Kerlogue Cross	08:15	10:10	13:10	15:10	17:10	19:10
Maudlintown	08:17	10:12	13:12	15:12	17:12	19:12
Wexford Town (Redmond Sq)	**08:25**	**10:20**	**13:20**	**15:20**	**17:20**	**19:20**

M-Su Service operates Mondays to Sundays
M-Sa Service operates Mondays to Saturday ex public holidays

053 9142742 | www.wexfordbus.com

Timetable is subject to change. Please confirm 48 hours prior to travel date. All times depend on traffic and road conditions at the time of travel.

Appendix E - Site Location Map



The seasonal and daily pattern of bat activity and the use of different types of roost at different times of the year will impact on the appropriateness of this methodology. Handheld detectors can be used on visits to roosts between dusk and dawn during the summer (buildings and trees) or autumn (some underground roosts) to detect active bats entering or leaving the site. The optimum time for dusk surveys at buildings, particularly during early summer is for the two hours after the first bats emerge as this will cover the emergence period as well as the first return to the roost for some species. The time of first emergence varies between species, with Leisler's leaving around sunset and Natterer's bats leaving about 1 hour after sunset. Bats using underground sites during the summer may not emerge till much later, perhaps even 4 hours after dark. Towards dawn, many bats swarm outside their roosts and surveys beginning about 90 minutes before sunrise and continuing until 15 minutes after sunrise ('sunrise surveys') are recommended. In autumn, it is possible to detect the social calls of males of some species of bats, notably Leisler's and pipistrelles. Surveys at this time of the year should begin about 30 minutes after the species' emergence time and it may be necessary to set the bat detector to record lower-frequency social calls.

Automated detectors linked to data-loggers have proved useful in some situations, particularly recording bats moving in and out of underground sites but the technology is constantly changing with improved systems being marketed each year. A static bat detector system is a system that will record bat calls in the absence of a person. Usually a broadband detector is used so that all types of bat calls are recorded. In addition, the timing of a recorded bat call and GPS position are also recorded. No single system is suitable for all situations and needs but many options now exist.

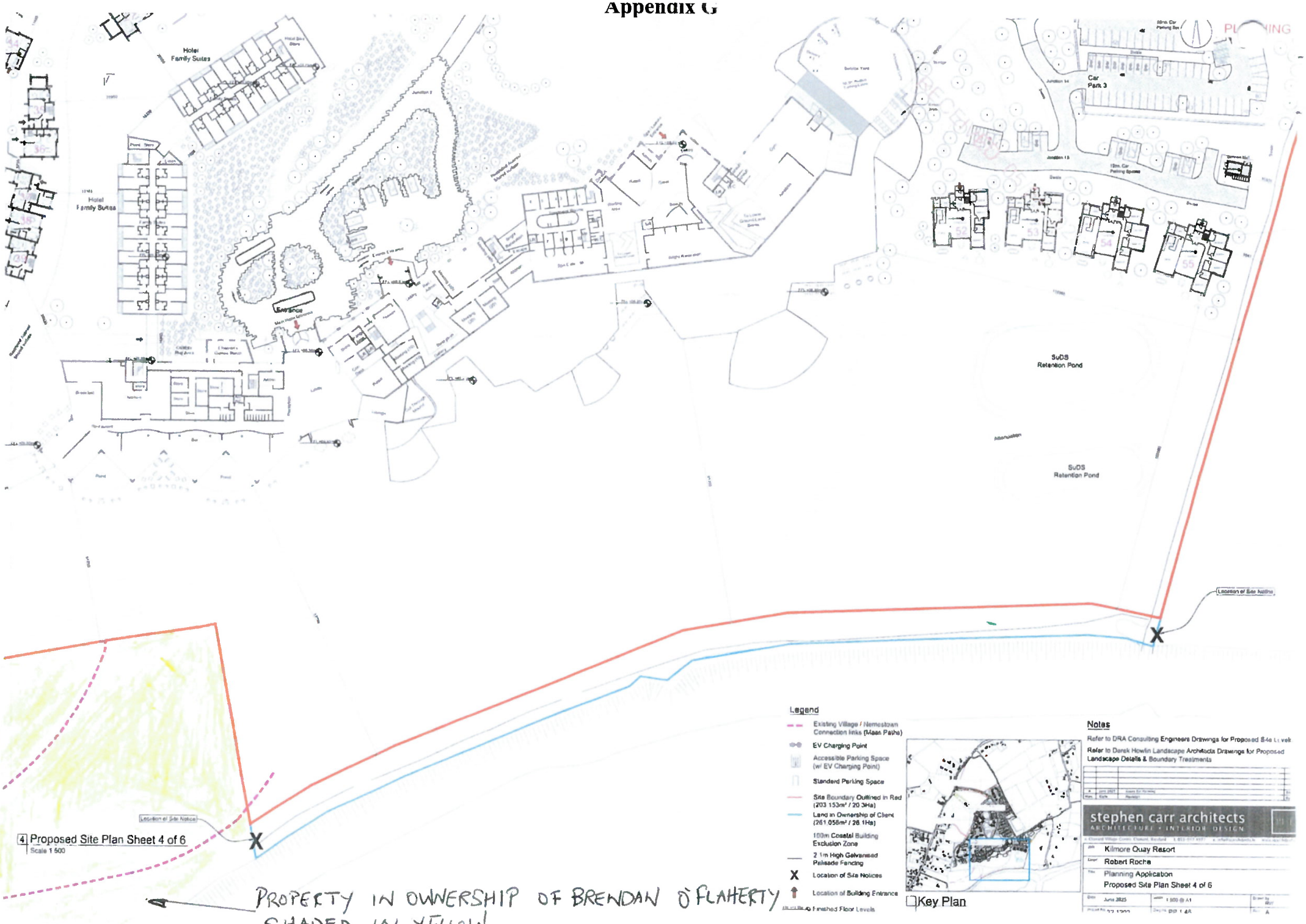
The use of static detectors has increased significantly in recent years as the technology has improved and equipment has become more affordable. These devices offer many advantages over conventional hand held detectors due to the length of time they can be left in situ. It is recommended that they are left in place for a minimum of one week, but for larger projects it can be useful to leave them in situ for longer. As well as recording the species present, including quieter species potentially missed during a walked survey, the resulting data from these devices can provide an overview of diurnal and even seasonal activity patterns. Paired detectors can also be useful in comparing two parts of a site to identify areas of higher usage. Static detector technology is evolving all the time and it is advisable to keep abreast of the latest developments and its potential uses while also being aware that devices and their related software need to be tested and proven in the field. Comparing outputs from different devices is also a potential source of confusion and error and this should be borne in mind when interpreting survey results.

Cameras, including infra-red cameras, also have potential to improve species recording at certain sites and can be particularly useful for emergence counts. Photography within roosts requires a licence from NPWS (see www.npws.ie/licences/disturbance/photograph-or-film-protected-wild-animal-or-bird) but is often the most effective and least disturbing way of counting large numbers of lesser horseshoe bats in a roost.

5.6.4 Netting and harp-trapping

Mist netting and the use of harp traps to catch bats with or without the aid of ultrasonic lures, are well-established research methods. However, it is rarely necessary to catch bats in flight for the purposes of surveys associated with development, although there may be occasions when the positive identification of species is required. These methods are invasive, time-consuming and require specialist training and

Appendix G



PROPERTY IN OWNERSHIP OF BRENDAN O'FLAHERTY SHADED IN YELLOW.

WEXFORD - COUNTY GEOLOGICAL SITE REPORT

NAME OF SITE	**St. Patrick's Bridge**
Other names used for site	St. Patrick's Rock, Nemestown Shore
IGH THEME	**IGH7 Quaternary, IGH13 Coastal Geomorphology**
TOWNLAND(S)	**Nemestown**
NEAREST TOWN/VILLAGE	**Kilmore Quay**
SIX INCH MAP NUMBER	**47, 52, 53**
ITM CO-ORDINATES	**697540E 603420N**
1:50,000 O.S. SHEET NUMBER	**77 GSI BEDROCK 1:100,000 SHEET NO. 23**

Outline Site Description
A long narrow tidal ridge of bouldery gravel extending almost 4 kilometres south from the Nemestown shore towards the Saltee Islands.

Geological System/Age and Primary Rock Type
The moraine ridge landform is comprised of Quaternary Age glacial sediments (mud, sand, gravel, boulders) deposited during the last Ice Age.

Main Geological or Geomorphological Interest
St Patrick's Bridge is an elongate landform which extends out (southwards) from the coast obliquely into the Celtic Sea. Composed of laminated muds with layers of sand, gravel and large pinkish-red granite boulders, the feature has been interpreted as a moraine ridge deposited at the southern margin of a grounded Irish Sea glacier. The 'bridge' probably extended as a sub-aerial land bridge to the Saltee Islands after the last Ice Age, but was drowned, eroded and reworked with rising sea-levels. The landform appears to have altered little since Ordnance Survey maps were first produced in the 1830s and 1840s. The muds and shell fragments in the lowermost sediments (basal diamicts) indicate an Irish Sea origin for the moraine (Irish Sea Till). The diamict is interpreted as a subglacial till. Bouldery accumulations of similar origin are present immediately east of St Patrick's Bridge.

Just east of the 'bridge', and about 250m offshore, a large glacial erratic (Carnsore Granite) known as St. Patrick's Rock, stands proud above the sea-surface. Erratic boulders, occurring in abundance to the east of the 'bridge' are mostly granitic. To the west, erratics are rare, indicating the ice front terminated at the St. Patrick's Bridge. The Sebber Bridge (rocky moraine) extends northwards from Great Saltee Island.

Site Importance – County Geological Site; recommended for Geological NHA
This important County Geological Site merits designation as a Geological NHA. It is located with the Saltee Islands SAC (000707). The moraine ridge is an important site for Irish Quaternary stratigraphy and helps in the understanding of the origin of the Irish Sea Till and the extent of the last British-Irish Ice Sheet in the Celtic Sea during the Last Glacial Maximum (LGM). Radiocarbon dating (47,175 to 29,305 14^{C}yr BP) of marine shells in the muddy sediments at Kilmore Quay has been used to infer the maximum extent of the British-Irish Ice Sheet during the Last Glacial Maximum (after 20,000 14^{C}yrBP).

Management/promotion issues
This is an excellent site in terms of macro-scale Quaternary glacial geomorphology. The nearshore part of the site is accessible *via* the beach at Nemestown and is easily visited at low-tide in calm weather conditions. Legend has it the 'bridge' was formed when St. Patrick, chasing the Devil, flung a succession of stones after the fleeing Devil, who was swimming out to sea. The arc-shaped moraine traced the route of the swimmer. The same legend tells of St. Patrick's Rock being flung from Forth Mountain by the holy saint, and is an example of where legend and truth confront: the source being quartzite and the megalith being granite. Nevertheless, these are two examples of geomythology from Irish folklore.



Viewed from Nemestown Shore: St. Patrick's Bridge (half-tide) extending south towards the Saltee Islands (distance). St. Patrick's Rock visible on left. Kilmore Quay Harbour visible far right.



Herring and Great Black-backed gulls on moraine. Little Saltee Island to the south.



Variety of rock types (granite, gneiss, schist, sandstone, limestone) on the beach and moraine.

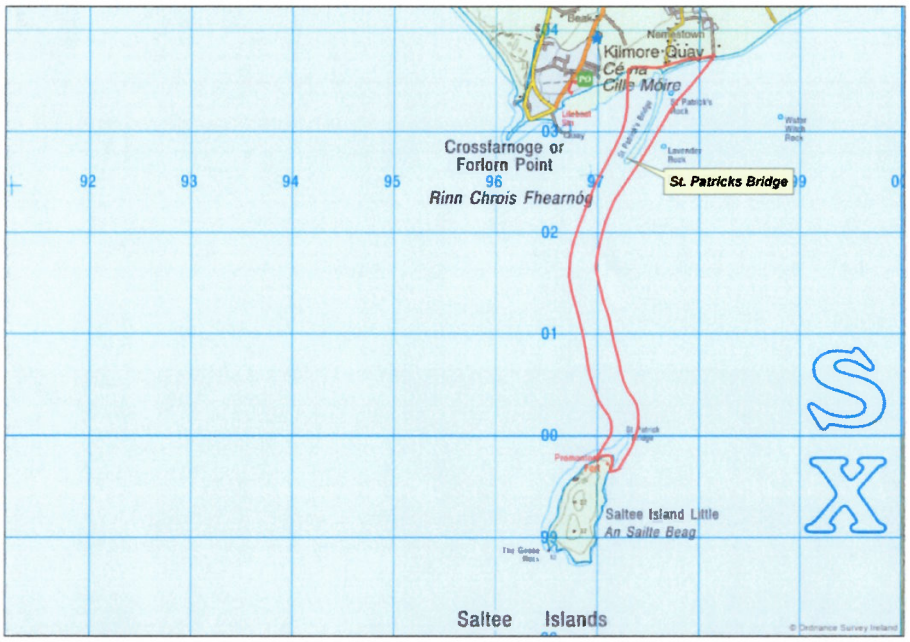


St. Patrick's Bridge viewed from offshore, looking north.*

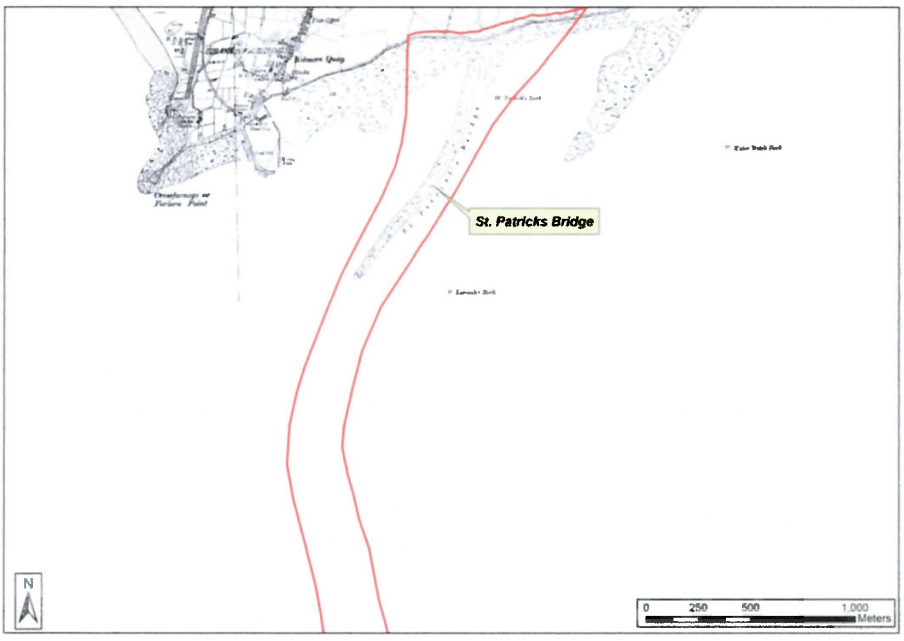


Shingle beach, St. Patrick's Bridge, Saltee Islands (far left) and Kilmore Quay Harbour visible (far right)

* Image: Office of Public Works Coast of Ireland Aerial Oblique Imagery Survey 2003. Permission to reproduce acknowledged.


Kilmore Quay
Cé na Cille Móire
Crossfarnoge or
Forlorn Point
Rinn Chrois Fhearnóg
St. Patricks Bridge
Saltee Island Little
An Sailte Beag
Saltee Islands
92
93
94
95
96
97
02
01
00
99
S
X


St. Patricks Bridge
N
0 250 500 1,000
Meters


St. Patricks Bridge
N
0 250 500 1,000
Meters

24) Conflicting Details

Please address all correspondence in relation to this submission to the above address.

Yours faithfully,

Brendan O'Flaherty

Brendan O'Flaherty