3rd Party Appeal

Correspondence Coversheet

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

Case Details

Planning Authority
Wexford County Council

PA Reg. Reference
20250962W

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

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

Correspondence Details

Correspondence Type	Received From	Lodged On	Validity	Valid OH Req
3rd Party Appeal	Conor & Anne Horgan	03/11/2025	Valid	No

Issue	Participant	Representative
BP01M — English	Conor & Anne Horgan	—

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 04/11/2025

Signed LM
Lauren Simone Murphy, Administrative Assistant

Date 6/11/25

Correspondence Coversheet

Payment ID: **FEE-PAY-000270**

An Coimisiún Pleanála

Section:	Processing
PA Name:	Wexford County Council

Submission Reference:	—

Date:	03/11/2025 ✓
Name:	Conor & Anne Horgan
Total:	€220.00 ✓

Attachments/Comment:	—

Created By:	Seán Young
Channel:	By Hand

Multiple

DOD: 6/10/25

LIO: 3/11/25 ✓

Name + address ✓

Ack ✓

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

AN COIMISIÚN PLEANÁLA
LDG- fee-pay-000270
ACP-
03 NOV 2025
Fee: € 220 Type: cash
Time: 12.57 By: hand.

Appellant:

Conor & Anne Horgan
5 Echo Beach
Kilmore Quay
Co Wexford

Date: 02/11/2025

Re: Appeal Against Grant of Permission by Wexford County Council

Planning Application Number: 20250962
Applicant: R Roche
Location: Kilmore Quay, County Wexford
Proposed Development: Integrated Tourism Resort Complex comprising hotel, leisure facilities, accommodation, access roads, parking, and ancillary works.

To Whom it May Concern,

This submission constitutes an appeal under **Section 37(1)** of the **Planning and Development Act 2000 (as amended)**. We the appellant, are residents concerned with the **environmental integrity, infrastructure capacity, and sustainable development** of Kilmore Quay and its coastal environment.

Grounds of Appeal

1 Non-Compliant and unsafe access route proposed through Echo Beach Estate

We also object to the proposal for a pedestrian and cycle route leading through Echo Beach estate to the R739 leading to Kilmore Quay. We object on the grounds that the proposed route is unsafe and not fit for purpose. See points below and enclosed further report on the Echo beach Estate,

- The Traffic & Transport Assessment (TTA) states a 2.5 M PEDESTRIAN/CYCLE LINK TO ECHO BEACH and an 85 M FOOTPATH "WITHIN THE TAKEN-IN-CHARGE ROAD NETWORK" from Echo Beach to Ard na Bá, with a new R739 crossing. This indicates off-site works and a link OUTSIDE the red line boundary and NOT CONTROLLED by the applicant.

- The STAGE-1 ROAD SAFETY AUDIT (RSA) flags the Echo Beach link explicitly and says it is "UNCLEAR IF AN APPROPRIATE CONNECTION BETWEEN EXISTING AND PROPOSED

PEDESTRIAN FACILITIES WILL BE PROVIDED"—a safety and completeness concern at the interface with the estate.

- The application appears to DEPEND ON LAND/ACCESS RIGHTS NOT DEMONSTRATED. Under the Regulations, applications that require works/access on third-party lands typically must include the owner's written consent; CONDITIONS CANNOT CURE THE ABSENCE OF CONSENT. This is a completeness and legal-certainty problem at determination stage.

- TTA and RSA show the scheme ASSUMES an Echo Beach pedestrian link but DOES NOT RESOLVE the detailed tie-in (levels, widths, tactile paving, priority). RSA identifies inconsistent tactile and widths and REQUESTS REVISION TO ENSURE SAFE USE BY VULNERABLE PEDESTRIANS (including visually impaired).

- The new link would CONVERT THE ESTATE EDGE INTO A STRATEGIC PEDESTRIAN/CYCLE CONDUIT for the whole resort (449 hotel rooms + 55 lodges + events centre), materially increasing FOOTFALL, NOISE, LATE-EVENING ACTIVITY AND OVERLOOKING risk along the estate road/paths—none of which is addressed with management or mitigation measures. The applicant's access drawings focus on site entrances, not estate-edge management.

- The TTA'S ACCESS STRATEGY hinges on the Echo Beach connection and the short off-site footway to Ard na Bá / R739 crossing. If those links are UNDELIVERABLE OR DELAYED, the trip distribution and pedestrian safety assumptions are INVALID; the IMPACT AT JUNCTIONS AND ALONG THE R739 would be UNDER-STATED.

- The submitted SITE LIGHTING LUX LEVELS drawing is high-level; there is no specific GLARE/SPILL CONTROL commitment at the Echo Beach interface, despite the link routing late-night guests past housing. (See site lighting plan file; estate lies on the edge of proposed circulation.) AMENITY IMPACTS (bedrooms/frontage) are not addressed with shields, dimming profiles or hours.

Please find enclosed detailed report outlining further evident and concerns in relation to the Echo Beach Estate.

2 Conflict with Development Plan and Overdevelopment

The proposed scale and intensity conflict with:

- **Objective TM07 & TM09 (Wexford County Development Plan 2022–2028)** – ensuring tourism development is appropriate to its location and scale.
- **Objective EN11** – protect coastal landscapes and character from inappropriate development.
- **Objective RS03** – protect the distinctive character of Kilmore Quay.

The development would constitute overdevelopment, visually dominate the settlement, and undermine local amenity and tourism balance.

3 Coastal Erosion, Flooding, and Climate Resilience

Kilmore Quay is vulnerable to **coastal erosion, tidal flooding, and storm surge**. The application does not demonstrate compliance with:

- **EU Floods Directive (2007/60/EC)**
- **Planning System and Flood Risk Management Guidelines (2009)**

- **Climate Action and Low Carbon Development (Amendment) Act 2021**
  Failure to adequately address **sea-level rise projections** and **erosion rates** undermines sustainable coastal management and could require future hard defences contrary to the **precautionary principle**.

4 Water Supply and Wastewater Disposal

The proposal risks overloading local wastewater systems, contrary to:

- **EU Water Framework Directive (2000/60/EC)**
- **Urban Waste Water Treatment Directive (91/271/EEC)**
- **EPA Code of Practice for Wastewater Treatment and Disposal Systems (2021)**
  Potential contamination of coastal waters and shellfish areas is a public health concern.

5 Traffic, Access, and Safety

Traffic generation will severely impact the **R739** and village core. The submitted **Traffic and Transport Assessment** is deficient in baseline data and fails to account for seasonal surges. The development contravenes **Development Plan Objective TM08**, which requires traffic capacity analysis for large tourism projects.

6 Ecological and Environmental Impacts

The project is within the zone of influence of:

- **Bannow Bay SAC (000697)**
- **Bannow Bay SPA (004033)**
- **Saltee Islands SAC (000707)**
- **Saltee Islands SPA (004002)**
  No robust **Appropriate Assessment (AA)** has been carried out as required by **Article 6(3) of the Habitats Directive**. The **EIA Screening** fails to meet the scientific standards required under **Directive 2011/92/EU (as amended by 2014/52/EU)**. Impacts on biodiversity, light pollution, and marine habitats have not been properly assessed.

7 Precedent and Cumulative Impact

The proposed resort would set a **negative precedent** for intensive commercial development along the south Wexford coast. The cumulative effect would erode the integrity of coastal ecosystems and undermine national and EU biodiversity objectives

Conclusion and Request

The proposed development:

- Contravenes national and EU planning and environmental legislation;
- Fails to comply with the Wexford County Development Plan 2022–2028;
- Endangers public health, coastal stability, and ecological balance; and
- Is contrary to the proper planning and sustainable development of the area. In particular the proposed unsafe access route through the Echo Beach Estate.
-

Accordingly, We respectfully request An Bord Pleanála to refuse permission for Planning Application 20250962.

4. Enclosures

1. Copy of Wexford County Council acknowledgement of receipt of submission

2. Appeal Fee (€220)
3. Echo Beach Access Assessment Report

The following residents of Echo Beach have confirmed their support for this appeal:

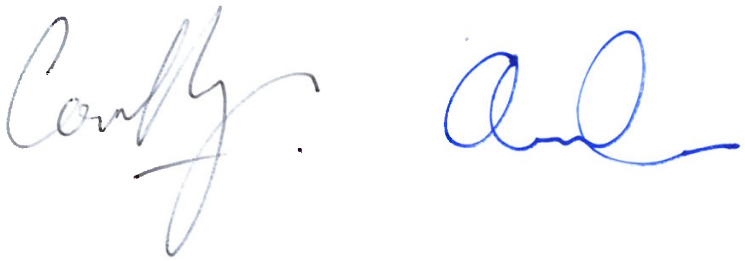
Elaine Leary,
6 Echo Beach,
Kilmore Quay,
Co.Wexford

Liam Power,
7 Echo Beach,
Kilmore Quay,
Co.Wexford

Claudine Keogh,
8 Echo Beach,
Kilmore Quay,
Co.Wexford

Susan Kelly,
9 Echo Beach,
Kilmore Quay,
Co.Wexford

Signed:



Comhairle Contae
Loch Garman

Wexford
County Council

5 September 2025

Conor & Anne Horgan
5 Echo Beach
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 **Conor & Anne Horgan** on 5 September 2025 in relation to the above planning application which was received by the Planning Authority on 05-Aug-2025.

The appropriate fee of €20.00 has been paid.

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

Staff Officer
Planning and Development

WEXFORD COUNTY COUNCIL

Planning Authority Stamp

Proposed Hotel Development, Kilmore Quay, Co. Wexford

Planning Objection to proposed access route through Echo Beach Estate

Introduction/ Background

Echo Beach is an established housing estate on the edge of Kilmore Quay Village, Co. Wexford, comprising nine privately owned dwellings. Houses no.1 and no.2 front onto the R739, while the remaining seven properties are accessed via the existing narrow estate road. Sightlines onto the R739 towards Wexford are restricted on the left of the photo below (fig 1) due to an existing pier/ shrubs projecting out.

The existing estate road is bound by existing dwelling boundary walls to the left which waver in and out impacting on the overall width of the road (fig 2). A single footpath can also been seen in the images below.



Fig 1: Entrance to Echo Beach Estate off the R739 (Kilmore Road)



Fig 2: Main Estate Road

Echo Beach Estate Planning Permission History

Echo Beach Estate was constructed in circa 2002 under **parent planning permission Reg. Ref. 20010779**, which provided for the erection of nine dwellings, consisting of eight three-bedroomed houses and one four-bedroomed house, together with associated site works.

The original site plan (Appendix A) indicated that houses no. 7 and no.9 would be provided with off-street parking, while the remaining seven properties would have on-street parking. A total of twelve on street spaces were indicated. An un-dimensioned footpath was noted to one side of the proposed 5m wide carriageway.

Condition 11 of this granted application noted the following:
"Footpaths shall be ramped at road junctions at gradients suitable to facilitate mobility of the disabled. REASON: In the interests of traffic safety."

A **revised permission, Reg. Ref. 20012903,** allowed for "proposed changes to previously granted houses types C & D consisting of changes to elevations and alteration to site works'.

The revised site plan lodged with this permission (Appendix 2) increased on-street parking to fifteen spaces, although six of these are located directly in front of private access gates (fig 3, 4 & 5), leaving only nine usable spaces not impeding on private access gates. The revised plan does not dimension the proposed footpath or carriageway. The original 5m wide dimension has also been removed.

It should be noted that the gates to the rear of properties no.1, no.2, no.3 and no.8 are for rear garden access only, these are not for vehicular parking within the property line.



Fig 3: parking area/gates to the rear of No.1 & 2



Fig 4: Parking area/gate to rear gate of no.3



Fig 5 – Parking area in front of gate to the rear garden of no.8

Neither site plan submitted to the council under the associated planning applications for Echo Beach Estate indicate the existing field access (fig 6 & 7) which is currently located at the end of the existing estate road. This is used several times annually by large machinery to facilitate crop harvesting and site maintenance.





Fig 6 & 7 Field entrance at the end of the Echo Beach Estate (location of proposed access point)

Existing Urban Design Challenges

The existing carriageway along Echo Beach Estate varies between 4885mm and 5320mm in width, which is insufficient to allow two cars to pass comfortably. As noted the existing boundary wall to the left of the carriageway (fig 2) undulates in and out causing pinch points along the roadway. The footpath, which is to one side of this carriageway only, varies in width from 1480mm to 1120mm, which falls well below current DMURS (Design Manual for Urban Roads and Streets) and Irish accessibility standards. Piers along with pathway leading into the properties also create pinch points along the footpath. Dish kerbs are provided at two locations only. No dished kerb has been provided at the end of the footpath opposite the existing field (fig XX below). No tactile pathing has been provided to the dished areas.





Fig 8 & 9: Footpath to the end of Echo Beach Estate (un-dished, no tactile paving)



Fig 10: Existing footpath width from 1480mm to 1120mm



Fig 11: Existing dished kerbs (narrow dished area with no tactile paving)



Fig 12: Existing dished kerbs (narrow dished area with no tactile paving)

Existing parking bays are partially unusable without significant manoeuvring or safety risk due to limited appropriate radii and the absence of turning areas/ hammerheads, forcing residents to park in unallocated locations and increasing congestion. The rear of the estate contains an agricultural field access gate, used periodically by large machinery. The introduction of a heavily trafficked pedestrian and cycle route through this area would create a significant safety hazard. The existing estate layout does not meet modern urban design standards, and it cannot safely accommodate increased traffic from the proposed hotel development.



Fig 13: No compliant radii to tight parking area with gates to rear of properties



Fig 14: Restricted Driveway Access



Fig 15: Congestion and tight passing

Objection

The current planning application (Reg Ref: 20250962W) proposes a large hotel development with family lodges, suites, spa and pool facilities, and staff apartments, accommodating over 445 beds, excluding day visitors and staff.

The main vehicular entrance is proposed off the R739, Kilmore Road for all vehicles, goods, visitors etc. A new pedestrian /cycle link is indicated to the West of the development through an existing field leading into the rear of Echo Beach Estate. The use of the existing mass path is also proposed leading from the east to the south west of the proposed development. This is an existing uneven rural pathway through fields etc.

This objection focuses on safety, accessibility, disturbance and traffic implications arising from the proposed access route through Echo Beach Estate.

No direct consultation with the existing residents for Echo Beach was undertaken prior to the submission of the planning application.

Objection Points

1. **Existing Field Access**

The current hotel application identifies the proposed pedestrian and cycle route leading from the development through the field to the rear (eastern end) of the Echo Beach Estate. The location point for the proposed route is the same location as the existing field access point, ref image above (figs 6,7 & 16). The field does not appear to have any alternative current or proposed entry points, leading to land which would be land locked.

The pathway also appears to split the field leading to two parcels of land which will remain landlocked. In the interest of sustainable development this needs to be addressed under this application. It would be unsafe to have a heavily used pedestrian and cycle route in any way combined or in close proximity to the route for harvesting.



Fig 16: Field Access to the end of the Echo Beach Estate Road

2. Unsafe Accessible/Pedestrian/Cycle Route

The Design Statement lodged with the application notes the following:

"The internal site would be private lands thus the road network would not be taken in charge. The primary access to the site for all vehicles is via a new priority junction with the R739. For emergency vehicles only and active travel users, access is also available from Nemestown. For pedestrians and cyclists, a dedicated link (approximately 2.5m wide) is proposed to Echo Beach. Along the R739 from Echo Beach to Ard Na Ba the applicant proposes to provide a new footway within the taken in charge road network as well as a pedestrian crossing of the R739. To the north of the primary site access a footpath is also proposed. Within the site a network of active travel routes are proposed. A possible future active travel connection is feasible from Echo Beach north to the proposed site access within the taken in charge road network. The feasibility of active travel connections has been agreed between DRA and WCC."

The highlighted sentence is worded to suggest an accessible route from the hotel to the R739 and beyond. There is no mention of the significant limitations through the Echo Beach Estate which already does not meet required design guidance. How can it be proposed to provide a *"dedicated link approx. 2.5 wide"* which reduces to over half this width along the Estate. The gap in design is clearly shown on the submitted document by way of the disconnect in the proposed redline boundary from Echo Beach Estate to the R739. This section of footpath has not been addressed or commented on although it key to linking up thse two zone noted.

The historic mass path, which the applicant proposes, is uneven, unlit, and unsuitable for wheelchair users, buggies, or cyclists. Similar to the route proposed though Echo Beach Estate is does not meet current design standards for the volumes proposed. Current Irish design guidance identifies minimum footpath widths of 1.8 metres under DMURS, with a desirable width of 2.5 metres for low to moderate pedestrian flows. The National Transport Authority Cycle Design Manual specifies a minimum width of 2.5 metres for shared cycle and footpaths, with a preferred width of 3 metres in rural areas. BS 8300 requires a minimum clear width of 2 metres for footpaths to allow two wheelchair users to pass comfortably. The existing footpath and access routes within Echo Beach Estate cannot be upgraded to meet any of these standards, making the proposed access unsafe and non-compliant.

3. Disturbance to Existing Residents

Echo Beach Estate is currently a quiet cul-de-sac with limited vehicular traffic restricted to residents, deliveries, and access to the rear field. There is no through road or footpath. The proposed hotel development will introduce significant pedestrian traffic both during the day and outside normal hours. Visitors staying outside the development may naturally walk to the hotel to use facilities such as the restaurant, spa, bar etc generating continuous foot traffic. In addition, the estate may be used for overflow parking, further increasing congestion and safety risks for residents. Further traffic will only cause further safety hazards and continued disturbance.

4. "Proposed Kilmore Quay Master Plan"

The Architects Design Statement lodged with the application, under paragraph 1.12 indicates an indicative site plan identified as "Kilmore Quay Master Plan". This masterplan indicates a "proposed vehicular route" through the Echo Beach Estate, ref Fig 17 & 18. This is not a feasible, compliant or safe access route for either pedestrians or for through traffic. As noted above the existing road is not wide enough for two way traffic or to provide a safe accessible footpath along side this very narrow road. The council must review this as safety is paramount. There is no available land to allow this to become a safe thorough fair. The council need to reassess the proposal to increase traffic along this route now or in the future.

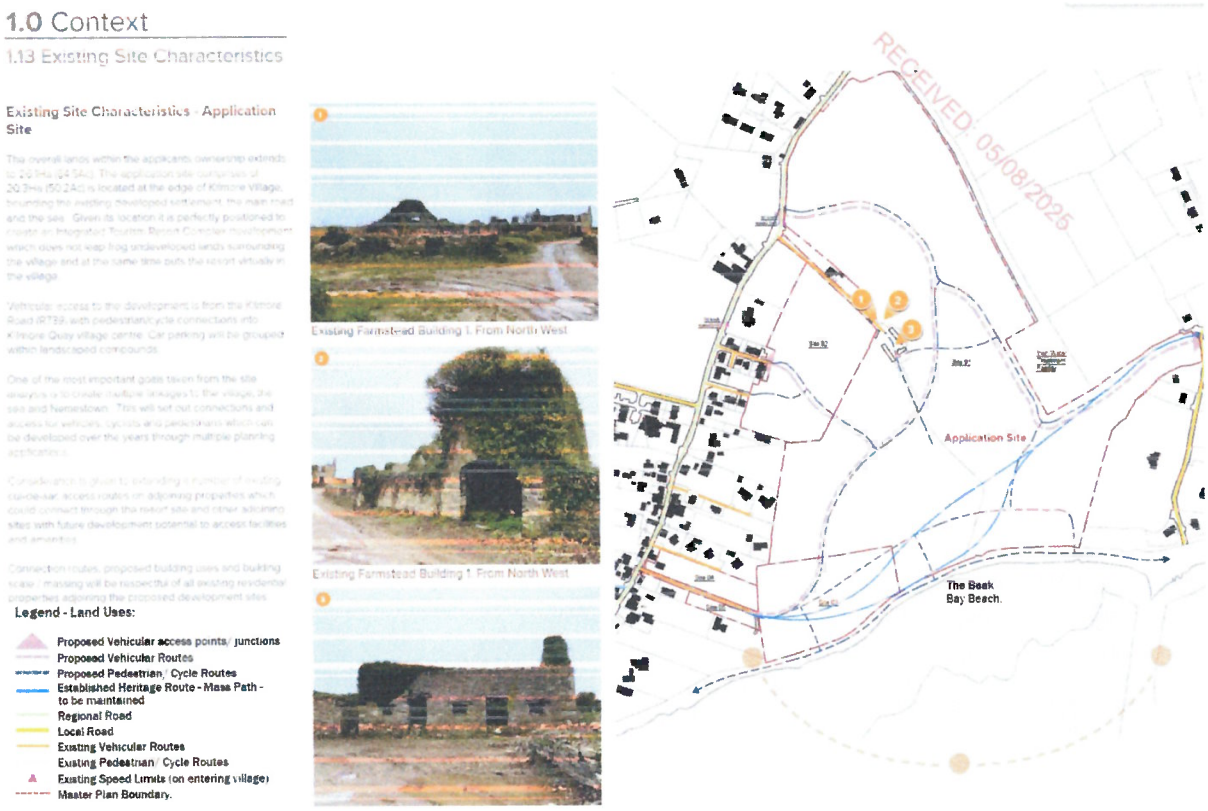


Fig 17: Extract from Design Statement, proposed vehicular route indicated at Echo Beach Estate

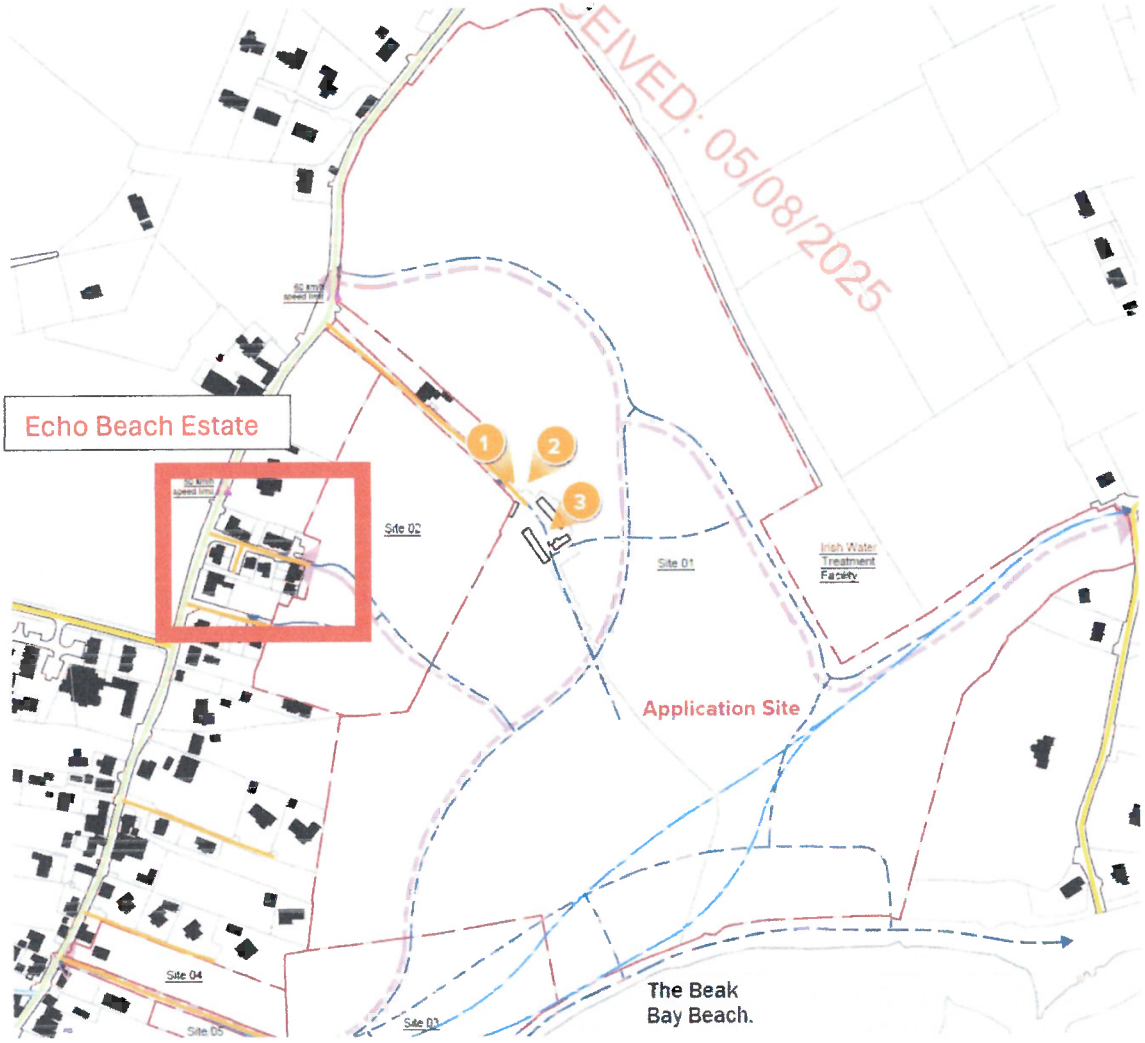


Fig 18: Vehicular Route indicated at Echo Beach (non-compliant)

Conclusion

It is requests that Wexford County Council require the developer to revisit and redesign village pedestrian and cycle access within the current proposal. The proposed route through Echo Beach Estate cannot meet minimum design and accessibility standards, presents a significant safety risk, and cannot accommodate the additional traffic generated by the hotel development. Alternative access solutions must be provided to protect residents and ensure compliance with Irish urban design and accessibility standards. The current proposal is unsafe, unsuitable, and would create serious hazards for all potential users.

Appendix A – Site Plan as per granted Parent Application Reg Ref: 20010779 for Echo Beach Estate



AREA OUTLINED IN RED DENOTES BOUNDARY AS GRANTED.
(See proposed on dwg. 01-592-wd02)

HOUSE TYPES TO WHICH PROPOSED CHANGES APPLY OUTLINED IN YELLOW.
(House type C2 & D1)

SITE AREA: 0.84 Acres / 0.34 Hectares

SITEPLAN AS GRANTED
SCALE 1:500

WEXFORD COUNTY COUNCIL RECEIVED BY POST 27 SEP 2001 PLANNING SECTION

DESIGN UNLIMITED
ARCHITECTURE · INTERIOR DESIGN
CUSTOM HOUSE QUAY WEXFORD
TEL: 053 24977 FAX: 23704 E-MAIL: DU@IOL.IE
BIAT

job
PROPOSED ALTERATIONS TO PREVIOUSLY GRANTED HOUSING DEVELOPMENT AT BEAK, KILMORE QUAY, CO. WEXFORD.(REG NO. 20010779)

client
MR. ROBERT MOORE

title
SITE PLAN AS GRANTED

date	drawn by	scale
05/02/01	D.TROY	1:500

drawing no.	rev no.	reference
01-592-PP01		

Appendix B – Revised Site Plan as per granted amened Application Reg Ref: 20012903 for Echo Beach Estate



AREA OUTLINED IN RED DENOTES
PROPOSED BOUNDARY.
(See granted on dwg. 01-592-wd01)

HOUSE TYPES TO WHICH PROPOSED CHANGES
APPLY OUTLINED IN RED.
(House type C, C1 & D)

SITE AREA: 0.87 ACRES / 0.35 HECTARES

WEXFORD COUNTY COUNCIL
RECEIVED BY POST
27 SEP 2001
PLANNING SECTION

PROPOSED SITEPLAN
SCALE 1:500

DESIGN UNLIMITED
ARCHITECTURE • INTERIOR DESIGN
CUSTOM HOUSE QUAY WEXFORD
TEL: 053 24977 FAX: 23794 E-MAIL: DUBIOL.IE
BIAT

job
PROPOSED ALTERATIONS TO PREVIOUSLY GRANTED HOUSING DEVELOPMENT AT BEAK, KILMORE QUAY, CO. WEXFORD.(REG NO. 20010779)

client
MR. ROBERT MOORE

title
PROPOSED SITE PLAN

date	drawn by	scale
05/02/01	D.TROY	1:500

drawing no.	rev. no.	reference
01-592-PP02		

