·d 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	John and Margaret Nunn	28/10/2025	Valid	No

Issue	Participant	Representative
BP01M — English	John and Margaret Nunn	—

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 29/10/2025

Signed LM

Lauren Simone Murphy, Administrative Assistant

Date 6/11/25

Correspondence Coversheet

Payment ID: **FEE-PAY-000189**

An Coimisiún Pleanála

Section:	Processing
PA Name:	Wexford County Council

Submission Reference:	20250962W

Date:	28/10/2025
Name:	John and Margaret Nunn
Total:	€220.00 ✓

Attachments/Comment:	—

Created By:	Pádraic Keane
Channel:	Post

Multiple

DOD: 6/10/25

LID: 3/11/25 ✓

Ack ✓

PL-500109-WX

Seascape
Kilmore Quay
Co. Wexford
Y35 HW01

AN COIMISIÚN PLEANÁLA
LDG- LRC-PAY-00789
ACP-
28 OCT 2025
Fee: € 220 Type: cheque
Time: 9.30 By: post

(3)

21/10/ 2025

The Secretary.
An Bord Pleanala
64 Marlborough Street
Dublin 1
DO1 V902

Re: Appeal

Planning Application Number:	20250962W
Applicant:	Robert Roche The Beak/Nemestown
Registration Date:	5th August 2025
Planning Approval Date:	6th October 2025

I refer to the above application approval by Wexford county Council for a hotel, housing and infrastructural works particularly noting the reference to a "Mass Path".

The highlighted access route described as a "mass path" in the planning application does not exist on the ground, nor did that access route historically exist as implied in the application 20250962W. The proposed route in the application is across private lands and then joins to a privately owned lane.

There is no customary right of access or other right over these lands or lane as they are in registered ownership. They are in the ownership of the authors and others.

The private lane was previously an agricultural field used to provide produce. Since September 1970 (55 years ago) it has provided private access to a house, our home and farmland. The lane also enters a field that is privately owned by a third party. The private lane also provides access to other houses built much closer to the village street.

The planning application implies a mass path route leading to the private lane and implies usage of the private lane. No mass path exists here.

The applicant nor his predecessors in title did not use the access route to access or egress the land subject to the application.

At no time during the last 31 years during which the authors of this observation have lived at the above address, has the lane or the field noted in the application been a public access route or part of a mass path. The entrance to the lane is marked private and expressly states "Private Access. No Unauthorised Use. No Access To The Shore. Authority. Owner".

No land has been actually or prescriptively dedicated by the landowner for public access nor has there been sporadic use of the laneway and field.

One of the authors of this observation letter, Margaret Nunn was born in Kilmore Quay in 1958 and recalls people talking about a former mass path but in her memory, this route has not been used. The disused path traversed along the shoreline (much of this land has now been eroded) and included the bottom of our garden and our two neighbours gardens, passing through Tom and Hilda O'Briens property to a style in "Olinda" laneway. It crossed "Olinda" laneway to another style in Kehoe's house and connected to the main roadway near the village chapel. The styles have been blocked for over 35 years . The route which was then primarily agricultural lands has been built over, housing has been developed on the route and no access is possible. (See attached map from Geohive, 1863 to 1924.)

This is a very different route to the route proposed in the planning application.

There has not been continuous and uninterrupted use of the pathway "as of right" for more than 40 years. All rights have been extinguished.

In so far as the application relates to property in our ownership, we do not and have not consented to the planning application.

We are aware of people using the beach below the high tide line and therefore below the proposed development as outlined in the planning application to access the village of Kilmore Quay from Nemestown and vice versa but this is limited by tide. Full tide restricts access at the northern end of the "Little Beach" in Kilmore Quay underneath "Olinda" a former Coast Guard station. This is the only route that is traversed by the public and just to reiterate does not include traversing along the privately owned lands or lands as outlined in the planning application.

Another anomaly in the submitted site pans for the proposed development is the omission of two houses Y35 HY99 and Y35X31 from the plans. Both these houses have a common boundary on the village side of the proposed development.

The approval of works external to the proposed site of a new footpath which is outside the applicants control as noted in the planning approval, from Echo Beach Ard Na Ba along the R739 impacts on two private house frontages and a protected Structure, namely the An Garda Siochána building. The An Garda Síochána building is a listed building in Wexford County Councils Record Of Protected Structures and is noted for its architectural interest as a standardised design from the Office of Public works and built @1939.

In the "Advice Notes" included in the planning decision Wexford county states *"AN Section 34 (13) of the Planning and Development Act (as amended) reads "A person shall not be entitled solely by reason of a Permission or Approval under this section to carry out any development " This is referred to in the context of the need to avoid infringing in any way the rights of adjoining property owners.*

This Advice Note equally applies to the proposed walk/cycle paths across private land where no right exists and as mentioned above in this appeal.

The size of the development is disproportionate to the size of this small rural village. The 2016 census recorded 372 residents whilst other sources record up to 417 residents. The proposed hotel development temporary visitor numbers exceeds the current village population and inevitably will stress or overwhelm the current infrastructure. The impact on the services to the village such as water is unknown as the potential of a development of this magnitude may be that local individual housing interests may be compromised due to water service restrictions.

This also has the potential to minimise Wexford County Council's economic hub, a designated area in Kilmore Quay.

The hub is designed to support "Blue Economy" which is the sustainable use of ocean resources for economic growth, improved livelihoods and jobs whilst preserving the health of ocean ecosystems. Any other development that may threaten or restrict economic support or challenge local infrastructure should be viewed in the context of Kilmore Quay's very nationally important fishing industry. Bord Iascaigh Mhara (BIM) in its May 2025 Report entitled "The Economic Impact of the Seafood Sector: Kilmore Quay" concluded once the indirect and induced effects are calculated, the total contribution of the seafood sector at Kilmore Quay equated to an estimated €54.8 million of value added across the south east in 2023.

A more modest or proportionate hotel development would be more manageable for this architecturally sensitive village and given there are already two closed hotels (granted they are less high star rating and more modest in ambition) a scaled down version of the new proposed development may be more in keeping with local vernacular architecture, infrastructure and visual amenity.

It should be noted there are at least 16 structures, other than the aforementioned Garda Station, on Wexford County Councils Record Of Protected Structures and include up to 16 thatched cottages which are original and unique examples of the country's vernacular architecture. By their very nature and in keeping with building standards of the time, many of those protected structures have shallow or minimal foundations and increased traffic (a doubling of the current resident population as estimated by the planning applicants) through the village has the potential to comprise the integrity of the buildings.

We wish to draw attention to these anomalies in the planning application and request the information we have outlined is acted upon accordingly and the proposed "mass path" or walking route through private lands and along a private lane be disallowed.

We await your response.

Yours sincerely

John Nunn and Margaret Nunn

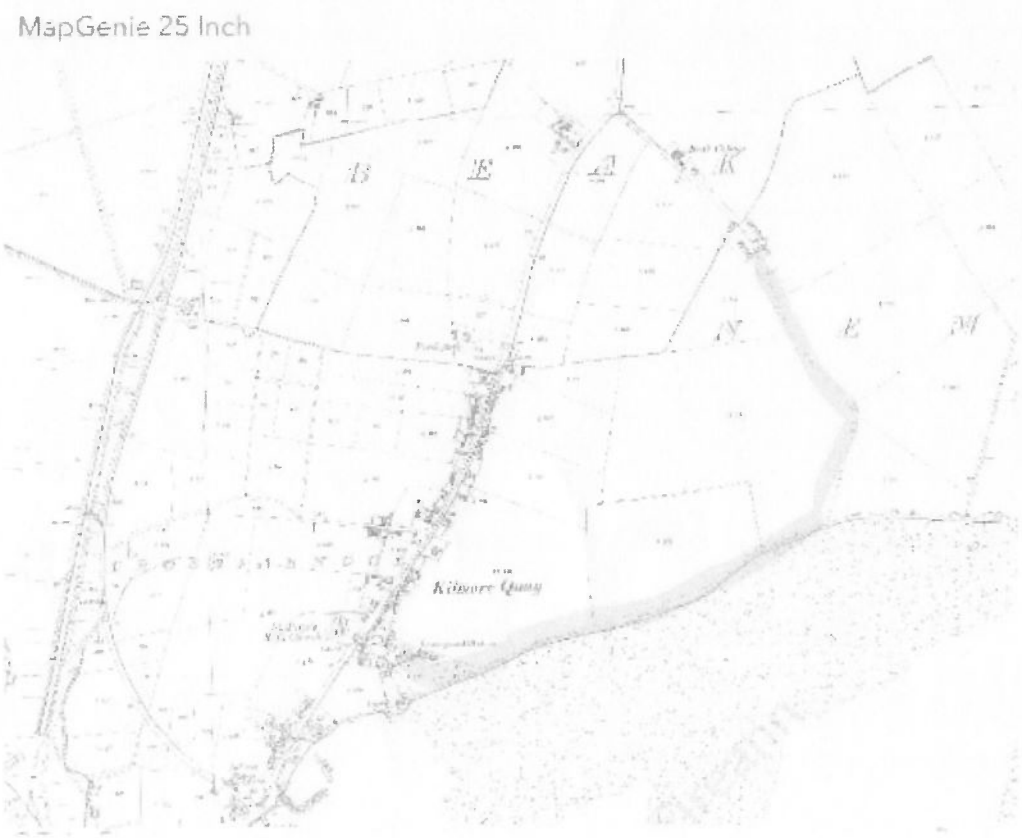
Attachments:

1. Historical Map Geohive 1863 – 1924
2. Property Y35HW01 belonging to the authors sited along the private lane
3. Private Access sign at the village end to the private lane
4. Proposed walking route through private land and lane submitted as part of planning application 20250962W
5. Acknowledgement Wexford County Council

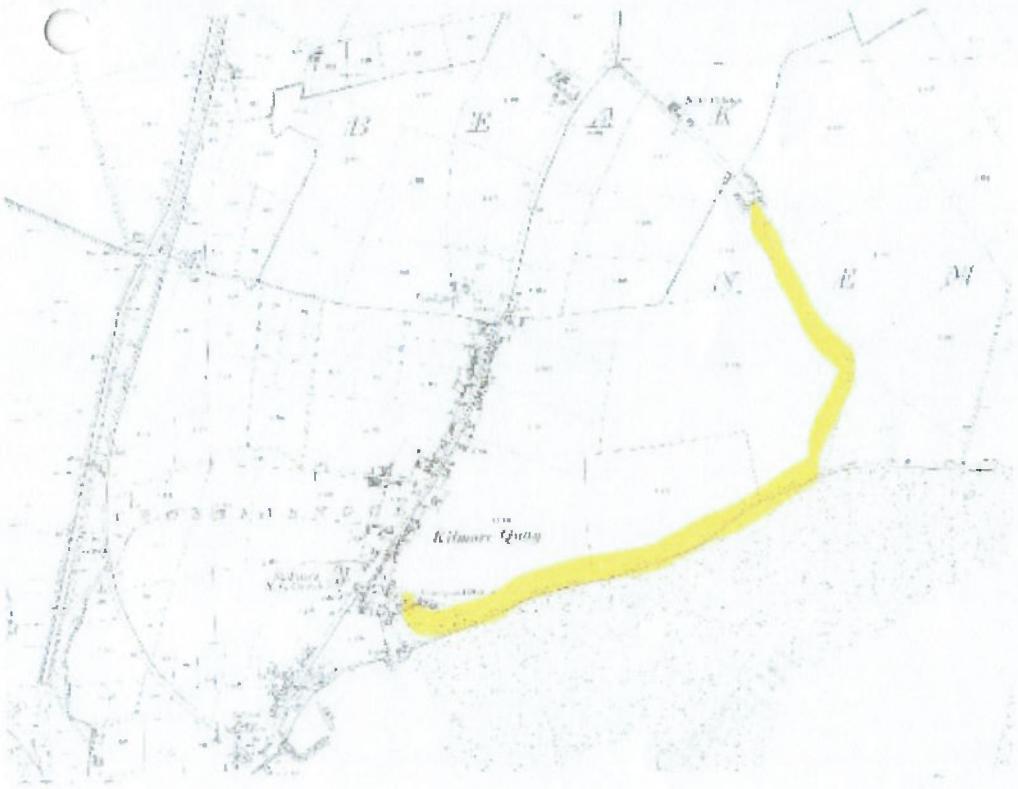


Submitted with
planning application.
Outside site proposal

This is an historical map from Geohive (1863 - 1924) It shows a pathway along the coastal edge of Brendan's O'Flahertys lands, but doesn't show a path traversing his property nor connecting to your property, https://www.arcgis.com/apps/dashboards/d5bdc7daef3e4537b67caa31dfcc42d5



MapGenie 25 Inch




PRIVATE ACCESS
NO UNAUTHORISED USE
NO ACCESS TO THE SHORE
AUTHORITY: OWNER

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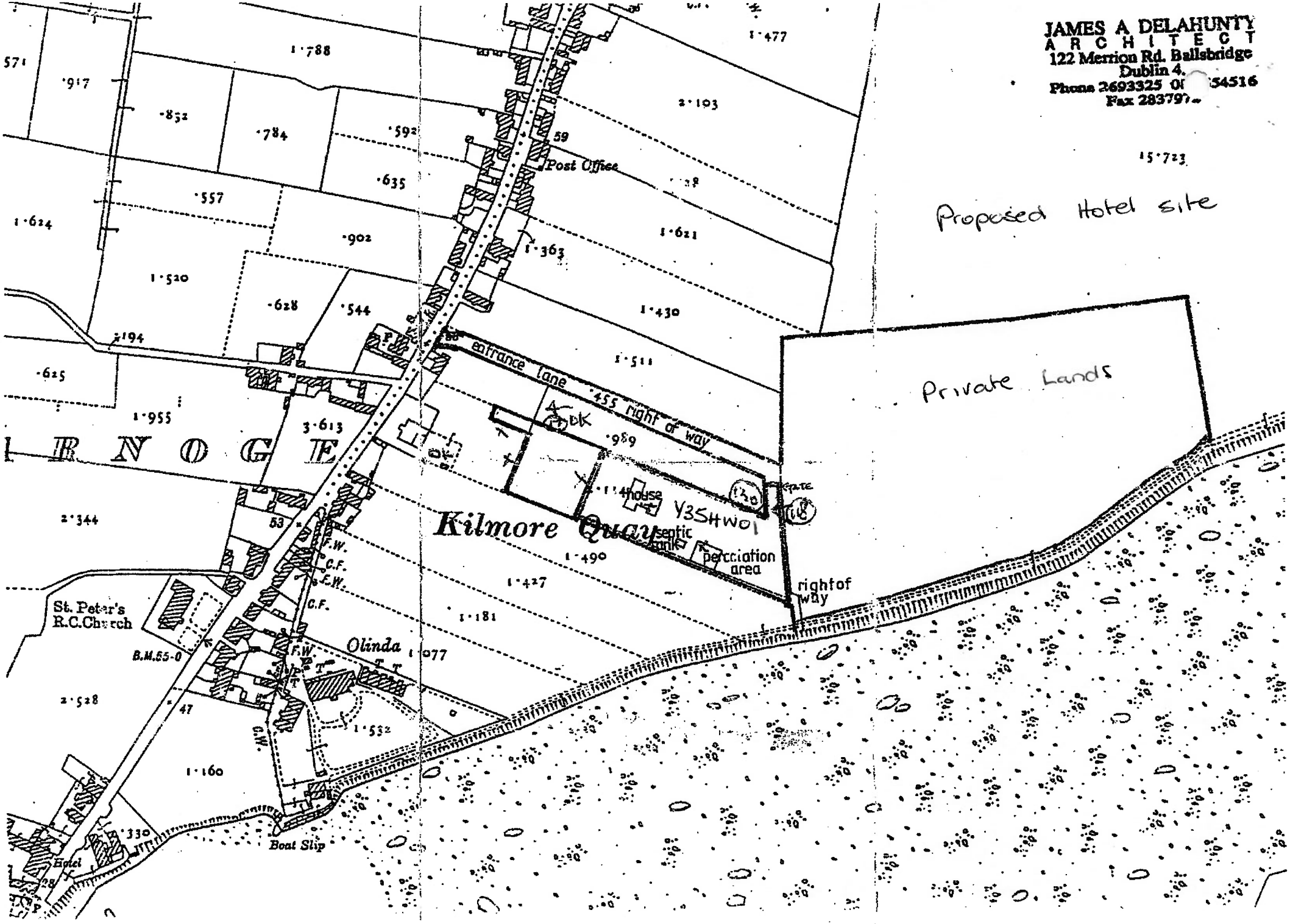
Fax 283797[illegible]



5 September 2025

John & Margaret Nunn
Seascape
Kilmore Quay
Co. Wexford
Y35 HW01

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 **John & Margaret Nunn** on _____ 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

P.P Karen O'Connor

_____
Staff Officer
Planning and Development

_____
Planning Authority Stamp