# ·rd 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 | Lorraine Gunning | 29/10/2025 | Valid | No |

| Issue | Participant | Representative |
|---|---|---|
| BP01M — English | Lorraine Gunning | — |

| 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** dm
Lauren Simone Murphy, Administrative Assistant

**Date** 6/11/25

Correspondence Coversheet

Payment ID: **FEE-PAY-000227**

An Coimisiún Pleanála

| | |
|---|---|
| **Section:** | Processing |
| **PA Name:** | Wexford County Council |

| | |
|---|---|
| **Submission Reference:** | 20250962W |

| | |
|---|---|
| **Date:** | 29/10/2025 ✓ |
| **Name:** | Lorraine Gunning ✓ |
| **Total:** | €220.00 ✓ |

| | |
|---|---|
| **Attachments/Comment:** | — |

| | |
|---|---|
| **Created By:** | Seán Young |
| **Channel:** | By Hand |

Multiple

DOD: 6/10/25

LID: 3/11/25 ✓

Fee ✓

Name + address ✓

AN COIMISIÚN PLEANÁLA
LDG- fee-pay-000227
ACP-
29 OCT 2025
Fee: € 220 Type: Cash
Time: 14.45 By: hand

2 September 2025

Lorraine Gunning
2 Saltee View
Klimore Quay
Wexford

**ACKNOWLEDGEMENT OF RECEIPT OF SUBMISSION OR OBSERVATION ON A PLANNING APPLICATION**

**THIS IS AN IMPORTANT DOCUMENT**

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

PLANNING AUTHORITY NAME: **WEXFORD COUNTY COUNCIL**

PLANNING APPLICATION REF NO: **20250962W**

APPLICANT: **Robert Roche**

LOCATION: **Beak/Nemestown, Kilmore**

A submission/observation in writing has been received from **Lorraine Gunning** on 01 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.

P.P Karen O'Connor

Staff Officer
Planning and Development

WEXFORD COUNTY COUNCIL

Planning Authority Stamp

2 Saltee View

Kilmore Quay

Co Wexford

Y35 AV25

The Secretary

An Coimisiun Pleanala

64, Marborough Street

Dublin 1

D01 V902

27 October 2025

Dear Sir/Madam

**Planning Application 20250962W**

**Integrated Tourism Resort Complex - Kilmore Quay**

**Letter of Appeal**

I write this letter of appeal as a born and bred resident of Kilmore Quay and as the owner of a family home adjacent to the proposed development. I have many concerns about the proposed development as outlined below, regarding the enjoyment of my own family home and also the negative impacts on the village and its residents. Therefore I respectively request that An Coimisiun Pleanala overturn the planning permission granted by Wexford County Council regarding the proposed development.

I enclose cash in the amount of €220 for the prescribed appeal fee and copy of Wexford County Council acknowledgement, dated 2 September 2025, confirming receipt of my observation.

The proposed development is contrary to several policies and objectives of the Wexford County Development Plan, for example the protection of rural character and visual amenity, environmental protection and water management, sustainable tourism development and infrastructure capacity.

The Decision Maker's Written Statement dated 6 October 2025 states it is considered there is sufficient information within the documents provided by the Developer, however letters submitted by Government agencies disagree with this statement on a number of points (see later paragraphs for more detail).

**Background**

Wexford County Council granted planning permission to the Resort Complex despite the numerous objections (60+) submitted to Wexford County Council. It is unclear if Wexford County Council adequately addressed the concerns of the residents of Kilmore Quay. The decision appears to rely on the Meinhardt and DNV reports, which were commissioned by the Developer. These consultant reports include conclusions based on assumptions, and it is unclear if these assumptions and conclusions were independently verified or challenged by Wexford County Council. The reports also include suggested mitigation measures for negative impacts identified. This is notable given that objections submitted raised concerns about whether those measures can be reliably monitored or enforced, therefore the mitigating effects could in reality be zero or negligible. Government agencies such as An Taisce and the Housing Department have noted their concerns on the reliance by Wexford County Council on information in the Developer's reports.

**Lack of engagement with community**

Other than one meeting, held by the Developer in the Stella Maris Centre on 2 May 2025, it is very disappointing to note there was no engagement, as far as I am aware, by the Developer or Wexford County Council with residents of Kilmore Quay, particularly those living close to the proposed development, who will be permanently impacted, should it proceed. This development is of a significant scale and massing, one which is not suitable for a small heritage village, and it has the potential for a negative impact on the local community. If completed it will be the largest 5 star hotel in Ireland.

**Scale and Character of the Development**

Section 7.7.5 of the Wexford County Development Plan (2022-2028) states that "Tourism development shall be **in keeping with the scale and character of the settlement**". The proposed development is approximately the size of 29 football pitches, is 6 storeys high and could accommodate more than **twice the population** of the village. This seems completely in contraction to requirements to be in keeping with the scale and character of the low rise heritage village. Is this proposed development really inkeeping with this unique, scenic, rural location? Will it add to the public enjoyment of the area, which is unspoilt and not overdeveloped, which is currently its major appeal? Kilmore Quay is a village with a rich culture and heritage. The local thatched cottages are on Wexford County Council's list of **protected structures**. The increased traffic vibration and pollution could have a negative impact on these historic buildings which are located roadside throughout the village.

Failte Ireland's Wexford Destination and Experience Developments Plan 2025-2030 encourages the growth of "niche" and "demand-led" accommodation in rural destinations. Has there been any creditable market analysis or tourism demand evidence presented to justify a hotel and resort of this **scale** in a small fishing village, and most importantly one of a **5 star price point**? Kilmore Quay does not have many unique selling points that is likely to attract that quantity of year round tourists paying **5 star prices**, when more attractive resorts such as hotels built in castles or historic houses are available, closer to airports and well established attractions such as Dublin, Killarney, Galway and The Wild Atlantic Way.

The letter dated 8 September 2025 by Failte Ireland to Wexford County Council notes that the average hotel size in Co. Wexford is 57 rooms. The proposed development is **many multiples** the size of this average, therefore highlighting how out of character it is with developments in the county.

**Water Supply**

On my reading of the planning documentation, it does not demonstrate that **adequate water capacity** exists to service the proposed development without causing deterioration of water quality or discharge issues. The letter from Uisce Eireann dated 15 September 2025 notes no plans to upgrade the water network and any upgrades must be funded by the Developer.

Environmental Impact Assessment Report page 21 states "*However, the potential for seasonal variations in groundwater quality and capacity will be considered in the detailed design of the supply wells*". The addition of over 440 bedrooms housing over 800 visitors, plus a leisure centre containing bar and 2 restaurants, function/conference centre facility with capacity for 400 people, spa/leisure complex with swimming pool, will place a **substantial strain** on the water supply to residents of Kilmore Quay.

The residents of Kilmore Quay were under a **water conservation order** for over **7 weeks** during Summer 2025. All year round the water supply suffers capacity and quality issues and low pressure. There are often unscheduled disruptions to service for repair works caused by leaks in the network. Will Uisce Eireann commit to providing a consistent and suitable water supply to the homes and businesses of Kilmore Quay taking into account the **huge demands** the proposed development will have?

Will the pressure the proposed development puts on the water system impact the **availability of planning permission** that may be sought in the future by local residents or their children wishing to build homes in the village and for **future business and existing business** (e.g. fish factories) that may wish to expand?

The existence of unregistered wells seems to be ignored in the reports provided by the Developer.

**Waste Water Treatment Plant**

Wexford County Council recently upgraded the Waste Water Treatment Plant in Kilmore Quay. The site of the plant lies within the same area of the proposed development. This site was previously owned by the Developer.

Subsequent to this upgrade planning permission was granted to the Developer for the proposed development. The initial works included the installation of a 160 mm inlet pipe constructed as part of the phase 1 of the WWTP construction to facilitate future connection from these development lands (see letter from Uisce Eireann dated 15 September 2025 and WCC Planning Report dated 13 October 2025, Effluent Treatment).

Is a **5 star hotel adjoining a waste water treatment plant** an attractive location for prospective tourists looking for a premium experience?

It is noted that the Developer has agreed with Wexford County Council that he will contribute to the capital cost to upgrade the wastewater treatment plant to Phase 2. Will this upgrade be sufficient to manage the **additional demands** the proposed development will add? The figures in the Developer's plans suggest the treatment plant would be **beyond capacity** even post upgrade works. Future building of homes and business premises in the village should also be considered to determine if the pressure the development will put on the waste water system will impact the availability of planning permission that may be sought in the future by local residents and business owners.

My understanding is that the EPA's recent Section 63(2) audit of Wexford County Council (April 2025 report) documents ongoing sewage complaints, unresolved discharges, incomplete inspection programmes for domestic wastewater systems, and resource constraints in the Council's environmental/water enforcement functions. The **scale of this development**, the **sensitive coastal location** and proximity to **areas of special conservation** should be seriously considered to ensure full compliance with Habitats and Water Framework obligations. Should appropriate independent assessment be performed to prove there will be no adverse effects on the integrity of any Natura 2000 site or deterioration of water bodies?

Based on my understanding Wexford County Council refused planning permission No. 20250179 in 2025 for 48 mobile homes in a holiday park in Kilmore Quay on the following grounds: "The proposed development would require that existing wastewater treatment system and public water supply be upgraded. In addition, the granting of this application would be considered detrimental to the delivery of permanent housing, industrial and commercial development. The proposed development is, therefore, contrary to Volume 1 Chapter 7 Objective TM 53 of the Wexford County Development Plan 2022 – 2028, public health and proper planning and sustainable development of the area."

This seems to be based on Objective TM53 of the Wexford County Development Plan which notes that the Council "will not consider proposals which would result in a reduction in the capacity in the public waste-water treatment system that would be detrimental to the delivery of necessary permanent housing." Should this point also be considered in relation to the proposed development? Based on the precedent set by this decision should the proposed resort complex have been refused by Wexford County Council?

EU and national law (Urban Waste Water Treatment Directive, Water Framework Directive and Waste Water Discharge Regulations) require that new developments do not cause deterioration of water bodies or breaches of discharge conditions. Therefore should all planning authorities only grant permission when they are satisfied that no adverse effects will occur?

**Traffic**

The village is currently negatively impacted by traffic congestion and inadequate parking facilities, particularly during summer months. Concerns regarding the potential unsafe traffic conditions were raised by residents at the public consultation on 2 May 2025. The proposed development could make this a year round safety concern for all road users.

The planning documents indicate a construction period of at least 3 years. This is a prolonged period of HGV and other construction vehicles using the R739 to Kilmore Quay. This could lead to deterioration of road surfaces and traffic congestion. Has an independent assessment been performed on the impact of this traffic on other road users?

Chapter 13 of the Environmental Impact Assessment Report was prepared by Meinhardt. From my understanding page 37 of this report indicates that the main road through the village of Kilmore Quay to the harbour area was **NOT** considered in the study area. The report states that "*Only road links where traffic is anticipated to increase by more than 10% are included in the study area*". It also states that the data was collected in August 2024, as August represents a peak period. Therefore if the 10% increase threshold was applied to a quieter month would the data breach the 10% threshold and thereby bring the

main road through the village into scope of the report? If so, would this result in a conclusion that is less favourable to the Developer and that would show detrimental traffic impacts?

In addition, how does the author of the report determine that the traffic to the proposed hotel will increase by more than 10%, yet the traffic into the village and harbour area will **NOT** increase accordingly? Page 33 of the 292 page Meinhardt report states that "*In reality, residents visiting the village centre are anticipated to utilise the walking and cycling infrastructure provided*". Is this a realistic assumption on which to conclude such a vital point concerning road safety? Is it likely that for example in winter a family with small children will walk 20 minutes to the harbour area in wet and windy weather, or are they more likely to drive? Conversely, in summer are families with small children likely to walk 20 minutes to the beach carrying everything that is needed for a day at the beach, and then walk back to the hotel in the evening? The report acknowledges "limited pedestrian provision through the village". In fact there are no footpaths from south of the existing Coast Hotel to the harbour and beach area, yet the report anticipates that hotel guests will walk through the village, not drive. Can such an assumption on the behaviour of thousands of future guests be made and reliably used to support such a conclusion?

Page 45 of the Meinhardt report states that "A series of assumptions have been used to inform this assessment provided by the applicant, O'Connell Marketing and Meinhardt". Have the planning authorities challenged these assumptions to determine if they are reasonable and likely, noting the points above? The Environmental Impact Assessment Report, Part 2, page 231 states an anticipated increase of over 1,000 total **DAILY** 2 way vehicle trips. The Meinhardt report then concludes that proposed development traffic is ***"not anticipated to have a significant operational effect on the local road network"***. For a village with less than 500 residents an addition of over 1,000 DAILY 2 way vehicle trips would be a **significant and detrimental** increase in traffic through this small historic village.

As mentioned above the Developer's plans include pedestrian access to the village via a non-existent "mass path" on land that is not owned by the Developer.

The plans also include access via Echo Beach housing estate (note the many objections by residents of Echo Beach regarding their grave concerns on road safety (submission numbers 10, 11, 34, 39, 48).

Condition 13 of the planning permission granted by Wexford County Council requires the applicant to provide details for constructing a footpath from Echo Beach to the Garda Station. However this is only 85m long and does not address the issue that for the rest of the road to the harbour and beach area there is no footpath. Is this condition effectively meaningless?

Access through Nemestown is also mentioned in the reports provided. The road in Nemestown is extremely narrow and not suitable for the increased traffic flow that would arise.

**Coastal Erosion**

There are serious concerns about coastal erosion in the area adjacent to the proposed development, and the devastating impact of this on the community has been reported in local and national press. A Senior Engineer with Wexford County Council, stated (as reported by RTE on Wednesday 10 April 2024) that "the average loss of coastline over the years was about half a metre per year, but in recent times this has increased significantly."

He also advised RTE that "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".

Given the concerns noted above by Wexford County Council staff, have the planning authorities satisfied themselves regarding the real risk of coastal erosion and the impact the disturbance of land at the proposed development site will have on coastal erosion in the area? Run off water from the proposed development site will have a further negative impact.

The data used by IE Consultancy in their report "Preliminary Coastal Erosion Assessment" is from 2013. This is over a decade old. Considering the exponential increase of coastal erosion, as noted above by Wexford County Council, in the last decade with more frequent and severe storms and rising sea levels is this data still relevant? The EI consultancy report acknowledges there is evidence of foreshore embankment erosion and slippage at the proposed development site. The letter from An Taisce also states the site is identified as vulnerable to coastal erosion. Indeed Wexford County Council and the OPW have performed coastal armouring in the area 2 kilometres from the proposed development site.

**Special Area of Conservation / Special Protection Area**

The following internationally designated sites are within 2km of the Proposed Development:

- Ballyteigue Burrow SAC (000696) (670m west);

- Ballyteigue Burrow SPA (004020) (1.9km west);

In addition the Saltee Islands SAC (000707) are close by. Any potential negative impact to these areas should be carefully assessed.

**Environmental Impact**

Environmental Impact Assessment Report page 17 states that "Provided all mitigation measures (and enhancements) are implemented in full and remain effective throughout the lifetime of the Proposed Development, no significant residual negative effects on the local ecology or on any designated nature conservation sites are expected from the Proposed Development."

Who is responsible for putting these measures in place?

Who will monitor that "all mitigation measures" are being implemented **in full** and **remain effective throughout the lifetime of the proposed development?**

What penalties/redress are in place where such measures are not maintained?

Who is responsible in the event the **proposed development fails**?

**Protected Species**

The otter is protected in Ireland since Wildlife Act 1976. It is a criminal offence to damage or destroy the breeding or resting place of an otter. The otter is listed on Annex II and Annex IV of the EU Habitats Directive. The DNV EIAR Volume 1 Non Technical Summary Report

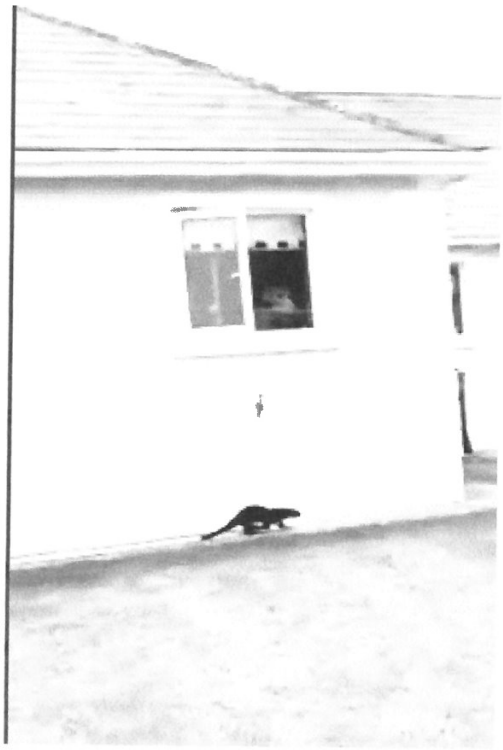
page 15 states "no evidence of otter was recorded along the shore line…". However many residents whose family homes are in close proximity to the proposed development site have seen otters on many occasions on the shoreline here and have photographic evidence of this. The below photo of otter pups clearly shows the Saltee Islands in the background and was taken near St Patrick's Bridge, directly adjacent to the proposed development site. The other 2 photos of otters were taken at homes at Y35 KC82 and Y35 HY99, meaning that the otters crossed the proposed development site when visiting those addresses.

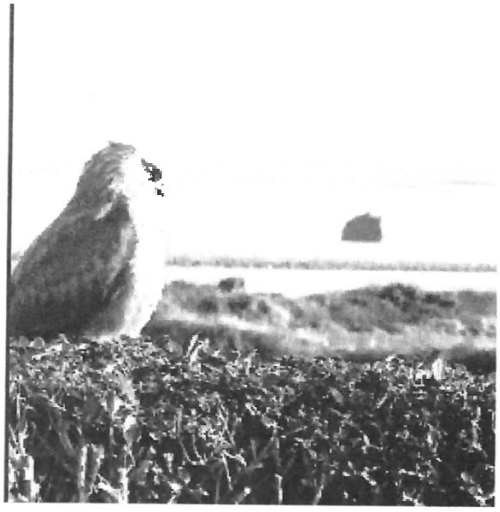
Therefore the report commissioned by the Developer is **misleading** in stating there was no evidence of otters, when residents have photographic evidence to disprove this. It is unclear to me why the consultants hired by the Developer **failed to identify** evidence of otters and why such a significant error regarding this **protected species** could occur in the Developer's report, which was relied on by Wexford County Council when granting planning permission.

In addition buzzards are fully protected in Ireland under the Wildlife Act, 1976, and the EU Birds Directive. Buzzards have been identified on the proposed development site also (see photograph below with St Patrick's Bridge in the background). Again, it is unclear to me why reference to this protected species which is present in the area was omitted from the Developer's report.









**Heritage Impact**

The proposed development is 6 storeys high (including lower ground floor). The height is 18.54m. This construction will not blend in with the local area and is not in keeping with the characteristics of this low rise quaint fishing village. The visual impact of this from the village (Little Beach, Old Pier and East Pier) will be out of character with the surroundings.

**Visual Impact**

The Architectural Design Statement and EIAR Landscape Chapter 12 acknowledge the contrast between the new development and the traditional heritage built Kilmore Quay. The proposed development would dominate the skyline and visually overwhelm the existing low rise settlement pattern of Kilmore Quay, which is defined by modest vernacular buildings, thatched cottages and a small harbour village character. The overall size and height are incompatible with both the WCDP settlement and the Principles of the Architectural Heritage Protection Guidelines for Planning Authorities (DAHG 2011).

The Wexford County Council County Development Plan (WCCCDP) highlights a number of key strategies including that it should "promote economic and enterprise development **appropriate in scale to the settlement**". As the proposed development could house more than **twice the population of the village** this is contradictory to the WCCCDP.

Section 7.1 of the WCCCDP states that in relation to tourism development there is a need to **protect and manage the county's tourism assets** and resources to ensure their **long-term sustainability**…" The increase of visitors, traffic and pedestrians to areas of special environmental concern could jeopardise these natural resources, such as the Special Area of Conservation and Special Protection Areas, the Saltee Islands and Ballyteigue Burrow.

Section 7.5.3 also notes the need to achieve the "balance between appropriate tourism developments and economic and social sustainability…" to ensure that "tourism assets can continue to be enjoyed by future generations and **not prejudiced by short term or purely economic considerations".** It also states that **"natural assets such as habitats and species and water quality are not diminished or threatened by tourism development or activity."**

Section 7.7.5 of the section re Tourist Accommodation states that "proposals for tourist accommodation in towns and villages must be **proportionate in size, appropriate in scale**, siting and design to its host settlement".

The proposed development does not align with the above and in is contrary to the proper development and planning for Kilmore Quay.

**Department of Housing Letter**

Refer to the 8 page letter dated 22 September 2025 addressed to Wexford County Council from the Department of Housing, Local Government and Heritage. This letter refers to a number of observations and concerns regarding the development of the 20.3 hectares site including:

1. **Archaeology:** A fieldwork based AIA be prepared to assess the potential impact on archaeological remains in the area. Was this report prepared and submitted to the relevant planning authorities before the planning decision was made?
2. **Nature Conservation**: the letter notes the "***significant concerns***" in relation to the "***accuracy of the baseline information***" and **significant insufficient nature** of the Developers reports in concluding that the proposed development will not adversely affect the integrity of the European sites. The letter details that some points are **poorly covered and some are not addressed at all.** Some of the areas of concern include bird habitats (curlews currently nest in the bank at the proposed development site), disturbance to qualifying interest species and habitats, insufficient attempt to incorporate design features to reduce collision risk, lighting and the lack of realistic mitigation measures, coastal erosion and the waste water treatment plant capacity.

   The letter from the Department of Housing, Local Government and Heritage outlines their concerns on the inaccurate information within these reports, yet Wexford County Council used these Developer's reports to support their decision to grant planning permission.

**An Taisce Letter**

Refer to the 4 page letter dated 8 September 2025 addressed to Wexford County Council from An Taisce, The National Trust for Ireland. This letter refers to a number of concerns and recommendations regarding the development of the 20.3 hectares site including:

1. **Scale of the Development:** Extensive local concern at the scale of the development in relation to the existing historic village.
2. **Traffic Impact**: instructing that a "**rigorous**" Traffic Assessment be conducted.
3. **Coastal Erosion Risk**: they state the proposed location is identified as a site vulnerable to coastal erosion.
4. **Wastewater Treatment**: the capacity of the wastewater treatment plant must be able to accommodate increased volumes.
5. **Habitats Directive**: notes that further assessment is required **and inaccuracies in the planning documents** stating that an area will not be subject to development, while in fact a new walking path will be created.
6. **Water Framework Directive**: further assessment is required under Article 4 of the Water Framework Directive (WFD) (2000/60/EC) to determine if the proposed development will cause a deterioration of the status of a surface or ground water body etc. particularly in the operational phase.

7. **Artificial Lighting Impact**: the proposed development will cause artificial light pollution in this sensitive coastal area and An Taisce advises this should be closely considered by planning authorities. A cumulative assessment of light pollution should also be conducted.

An Taisce advises that the above points necessitate close consideration and further investigation by planning authorities. Have these been undertaken and conclusions shared with planning authorities?

**Examples of Errors and Inconsistencies in Developer's Plans**

Omission of houses from the Developers Plans

Two of the closest houses to the proposed development (Y35 HY99 and (Y35 YX31) were omitted from drawing number PP1.41 in the documents submitted by the Developer to Wexford County Council. The drawing provided by the Developer to Wexford County Council was therefore incorrect. Does it point to lack of proper due diligence exercised by the Developer and his delegates in relation to the application submitted?

Mass Path

As referenced in objection letters (submissions 37 and 61) the Developer's plans includes reference to a mass path which is highlighted as an access route for the proposed development. This path **does not exist**. The proposed access route is across **private land** and then joins a **privately owned lane**. Access to this proposed path is **completely unconsented** by the owners of this land. It is unclear how the Developer's plans can include an access route on land that is not owned by the Developer and consent has not been provided by the landowners.

Presence of Otters

As referred to above the DNV EIAR Volume 1 Non Technical Summary Report page 15 states "no evidence of otter was recorded along the shore line". However photographic evidence can dispute this.

Multi Story Car Park

The conditions imposed by Wexford County Council include number 22 regarding a multi storey car park. The plans submitted by the Developer do not include a multi storey car park. It is unclear why this anomaly exists in the planning.

Fingal County Council

Why is reference made to Fingal County Council in the NIS report?

Working hours

There are contradictory statements re permitted working hours.

Estimated Staffing Levels

The report includes estimated staffing levels that appear grossly understated for a 5 star development which relies heavily on staff to guest ratio. Also employment gain is not a standalone justification for development where it appears contrary to core policy objectives of local government.

**DNV Report - EIAR Volume 1 Non Technical Summary**

Environmental Impact Assessment Report page 3 states that the report was prepared on behalf of the Developer. However it bases favourable conclusions on the impact of the proposed development on **unrealistic assumptions**. It was anticipated that these assumptions would be challenged by Wexford County Council Planning Department and that they would perform their own independent analysis of all areas covered in this report. It is unclear if this occurred given the short time frame for approval.

**Mitigation Measures**

The DNV report EIAR Volume 1 Non Technical Summary Report suggests a number of mitigation measures, however these seem to be suggestions and recommendations rather than mandatory measures. Do these go far enough to protect the important habitats, species and wildlife in the area? It appears the development is contrary to the proper planning and sustainable development of the area. It will increase the number of year round visitors to this ecologically sensitive location. The buildings would be highly obtrusive and visually incongruous with the existing low rise village and would detract from the architectural heritage and would seriously injure the visual amenities of the area. It could set an undesirable precedent for similar developments and would be contrary to the proper planning and sustainable development of the area.

The Developer's report includes "mitigation measures" and "recommendations". These are only effective if mandatory and policed. Otherwise is it reasonable to assume that these mitigation measures may not be applied consistently resulting in adverse impacts? In the event of commercial failure of the development who is responsible for ensuring these mitigation measures are implemented? The report includes conclusions in favour of the development based on these mitigations and recommendations. However if these recommendations are not in place then the issues regarding the proposed development remain.

**Construction Phase**

Environmental Impact Assessment Report page 13 notes that "The construction phase could also have likely negative effects in the form of air quality, dust, noise production, risk of contamination of water sources and increased number of construction-related vehicles utilising the road network." The construction phase is estimated to be 3 years. The residents in homes adjacent to the proposed development will be negatively impacted over this prolonged period.

**Alternative Locations**

The Environmental Impact Assessment Report page 6 states that "As the Proposed Development site is in the ownership of the Applicant, no alternative locations were considered by the Applicant for the purpose of this development." However this location will bring a large volume of traffic to the small heritage village of Kilmore Quay and could be a potential hazard to coastal erosion. The proposed development has over 440 rooms, which

if fully occupied would be more than double the population of Kilmore Quay (447 per Census 2022).

Page 9 of the O'Connell Marketing Report states that the development will have "A 360-degree panoramic view of Kilmore Quay". The rooftop facilities, hotel windows and lodges **overlook** homes in the adjacent area, compromising the **privacy** of residents and potentially impacting the **natural light** available in their homes.

Environmental Impact Assessment Report states that "Kilmore Quay is defined in the Wexford County Development Plan (WCDP) 2022 to 2028, as a Level 3b Strategic Settlement, stating that 'there is a strategic imperative to prioritise the development of these villages". There are currently 2 hotels (The Wooden House and Coast Hotel) in the village which have been either closed for business or used for purposes other than tourism over the last number of years. The rejuvenation of these hotels would be a more suitable and sustainable solution to assist development of the village.

**Employment**

Environmental Impact Assessment Report page 13 states that "During the operational phase approximately 150 jobs will be created having a positive impact, both directly and indirectly to the local economy and employment". If a hotel operator has not been appointed, is it reasonable to comment on the employment opportunities, given that a hotel operator may bring their own trained staff in from other locations? Staff accommodation is included in the development.

While perhaps not a direct planning point it is worth noting that during the construction phase the proposed development will utilise a number of builders and tradesmen which could be better employed in providing much needed housing for residents.

**Fire Safety**

Has a suitable Fire Safety report been provided (the publicly assessable material does not seem to include a Fire Safety report)? If not did Wexford County Council have sufficient information to fully consider all safety concerns relating to evacuation, fire-fighting access and potential life saving arrangements during both daytime and night-time operation to ensure the safety of staff and guests?

**Disability Access Report**

Building Control Regulations 1997 (as amended) Part M requires a Disability Access Certificate (DAC) for each building type. These seem to be absent from the application.

**Commercial Viability**

While commercial viability of the proposed development is not a direct planning concern it will lead to planning concerns if the development is a failure and the buildings are repurposed for a use other than that under which this permission is sought, or left vacant. This proposed development is being billed as a 5 star resort and planning permission is requested on that basis. The **long term commercial viability** of this proposal should be considered given the immense and disproportionate scale of the proposed development compared to the size and character of the village.

It was recently reported by RTE that **pre-tax losses** at the 5 star Carton House hotel resort in Co Kildare last year increased by 36% to €3.47m. This hotel is close to Dublin and other tourist sites in Kildare and regularly hosted training camps for Ireland's men's rugby team and the hosted the 2025 and 2024 KPMG Women's Irish Open at the resort's O'Meara golf

course. The company directors noted that the industry in which the group and company operates is "**competitive and challenging**".

Also for example the City West Hotel was a substantial 4 star development close to Dublin city with extensive conference facilities, a leisure centre and an 18-hole golf course. The hotel and conference centre, which was Ireland's largest hotel with over 770 bedrooms, went into receivership. It is now used for non tourism purposes which would not have been the basis of the original planning permission granted. The social and economic impact, on the heritage village of Kilmore Quay, of such a potential turnaround of use should be considered by any organisation involved in granting planning permission.

The proposal does not specify a hotel operator and this lack of a major important player in the development should be addressed. Does this raise concerns about the future of the proposed development? Kilmore Quay already has 2 hotels which have been closed or used for non tourism purposes at various stages over the last 2 decades.

**Site Notice**

I note that the applicant should have removed the site notices immediately after the decisions of the planning authority is given. At the time of writing the site notices remain in place. It is an offence under Section 252 of the Planning and Development Act 2000 (as amended) to contravene a requirement under the Regulations. While this appears a minor offence does it indicate a lack of respect to the planning rules and a sign of future lack of adherence to planning regulations?

**Summary**

In my view, the proposed development is incompatible with local infrastructure capacity and disproportionate to the scale of this heritage village. I therefore submit this appeal against Wexford County Council's decision to grant permission for the development.

Yours sincerely

Lorraine Gunning