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	Manfred Schulte-Austum	29/10/2025	Valid	No

Issue	Participant	Representative
BP01M — English	Manfred Schulte-Austum	—

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

Comments
—

Filing

Attach to File ☐

Return to EO ☐

Signatures

Signed Cathy Carleton

Cathy Carleton, Executive Officer

Date 30/10/2025

Signed LM

Lauren Simone Murphy, Administrative Assistant

Date 6/11/25

Correspondence Coversheet

Payment ID: **FEE-PAY-000224**

An Coimisiún Pleanála

Section:	Processing
PA Name:	Wexford County Council

Submission Reference:	20250962W

Date:	29/10/2025
Name:	Manfred Schulte Austum
Total:	€220.00 ✓

Attachments/Comment:	—

Created By:	Seán Young
Channel:	By Hand

Multiple

DOD: 6/10/25

LID: 3/11/25 ✓

AM ✓

Name + address ✓

AN COIMISIÚN PLEANÁLA
LDG- fee-pay-000224
ACP-
29 OCT 2025
Fee: € 220 Type: card
Time: 2.45 By: hand

10 September 2025

Manfred Schulte Austum
The Beak
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 **Manfred Schulte Austum** on 06-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.

PP Emma Seaver

Staff Officer
Planning and Development

WEXFORD COUNTY COUNCIL

Planning Authority Stamp

The Secretary
An Coimisiun Pleanala
64, Marborough Street
Dublin 1
D01 V902

Planning Application number 20250962W Wexford County Council

I wish to appeal the planning decision granted by Wexford County Council on the 06.10.2025 in respect of the above planning application.

As a resident and home owner in Kilmore Quay, whose house features prominently on the developers planning application, (documents - verified photo montages - view 5 proposed), I have many concerns, which I am asking ACP to take into consideration:

Heritage Village
Kilmore Quay is nationally and internationally recognised as a quaint village with rich heritage and character. Many local thatched cottages have been included by Wexford County Council on its list of protected structures. Introducing a Resort Hotel and Lodges within the vicinity of the village will undermine its character and vernacular architecture. The location of the development of the hotel at one of the highest points in Kilmore Quay will dominate the landscape and sightlines from many points in the village as well as from the near and distant shoreline. The development will be close to protected thatched cottages, residential houses and will have an unreasonable overbearing and visually dominant effect on adjoining sites and the whole village.

Wexford County Council Development Plan 2022 – 2028
The WCC development plan highlights a number of key strategies and approaches which do not support the proposed development. The proposed development requires that the wastewater plant be upgraded. The hotel development will utilise the full capacity of the upgraded waste water treatment plant and will not allow for local permanent housing needs, industrial or commercial development. The proposed development is contrary to Volume 1 Chapter 7 Objective TM53 of the Wexford County Development Plan 2022 – 2028, public health, proper planning and sustainable development in the area.

Wexford County Council refused planning permission No. 20250179 for 48 mobile homes on the following grounds and I quote '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.'
Based on the precedent set by this decision the new Resort Hotel Development should have been refused by WCC.

Coastal Erosion Risk & Outdated Reports
The applicant's claim;
That the consultants preliminary coastal erosion assessment concludes: 'the site is not in a location of significant erosion risk; no development is proposed inside the 100m building exclusion line'; the OPW ICPSS 2013 mapping and OPW NCFH (2021) mapping were used and do not show a 2050 erosion line adjacent to the site. The development site sits within a region of soft, sandy and glacially derived coastline, i.e. it is increasingly exposed to accelerated erosion due to storm surges and rising sea levels. It is noted the Wexford soft shoreline shows unconsolidated sediments highly vulnerable to erosion (environmentandsociety.org). Reliance on ICPSS (2013) is outdated and was never designed to capture accelerated climate impacts since 2013 as it predates a period of rapid coastal change. Since 2013 Wexford has experienced documented, accelerating erosion events and local losses. The preliminary assessment does not meaningfully engage with these newer data or local events. (wexfordcoco.ie)
In the intervening years the coast has seen rapid erosion due to

- Current sea-level rises
- Increased storm frequency and intensity in recent years
- Ongoing erosion between St. Patrick's bridge and Kilmore Quay harbour

WCC climate action plan page 41 stipulates: 'Coastal erosion has been identified as a unique hazard type due to the ongoing nature of this threat. It was noted that erosion rates have accelerated in Wexford in recent years, as several high wind events, storm surge occurrences and coastal flooding events, particularly over the last 5 years, have exacerbated the coastal erosion rate at identified erosion risk zones in Wexford as seen in figure 3.2.' It is followed by picture of Kilmore Quay in red. The Wexford County Development Plan specifically requires up to date site specific climate and erosion risk assessments such as high-resolution geomorphological trend studies and updated shoreline monitoring. The absence of a modern climate adjusted assessment is a serious policy breach, which WCC did not consider in the decision. The 100m building

exclusion line is necessary but not sufficient. The WCC Development Plan Chapter 12 requires applicants for developments within settlements on soft shorelines to show, using best available science including climate projections, that the development will not be at risk within it's lifetime and that it will not extend coastline length, which would require coastal defenses. The developer's assessment states that a 100m building exclusion line is provided, but does not provide a long-term modelling that Chapter 12 (modelling that incorporates future sea level rise and storms). See Chapter 12 Wexford Development Plan (CZM 35 and ZCM 29) which places the onus on the applicant/developer. The developer's preliminary assessment does not satisfy the rigor of Chapter 12 demands. A comprehensive Coastal Geomorphology and Shoreline Evolution Assessment is required, prepared by an independent coastal geomorphologist and including:

- Multi-temporal shoreline position analysis (historic aerials and satellite) to quantify past retreat/advance rates;
- Sediment budget/transport analysis for the immediate coastal cell
- Wave/storm surge modelling with credible sea-level rise scenarios for the full lifetime of the development (60 – 100 years)
- an assessment of the potential need for coastal defense works and whether the development would extend the length of the coastline requiring defense
- clear demonstration that no new critical infrastructure such as a hotel and lodges will be located where they could not be defended without coastal defense works

Various planning applications to WCC within the 250m building exclusion line were refused, citing necessary coastal defense. A 100m building exclusion line needs a very firm and sound assessment (see above), that no coastal defense will be needed during the development's lifetime. WCC did not insist on such comprehensive assessment to avoid future expensive works to protect the coastline and the hotel.

Loss of agricultural land

It is also important to note, that the development site is currently used to cultivate carrots, maize and barley, thus it is contributing to local livelihoods and broader food security. The development will permanently remove arable land from production. Loss of productive agricultural land is permanent and contrary to National Planning Framework objectives for safeguarding agricultural land. Displacement of the tenant farmer undermines local food security and rural livelihoods.

Water

Point 4.10. of the Hydrogeological assessment report states that 'The Habitats Directive (92/43/EEC) seeks to conserve natural habitats and wild fauna and flora by the designation of Special Areas of Conservation SACs ' and the Bird Directive (2009/147/EEC) seeks to protect birds special importance by the designation of Special Protection Areas SPA's. SAC's and SPA's are collectively known as Natura 2000 or European sites. National Heritage Areas (NHA's) are designations under the Wildlife Acts to protect habitats, species or geology of national importance such as St. Patrick's Bridge. Although many NHA designations are not yet fully in force under this legislation, they are offered protection in the meantime, under planning policy which normally requires that planning authorities give recognition to their ecological value.

The hotel development seeks to extract up to 241 cbm/day from on-site wells, supplemented by mains water. The aquifer is classified by the Geological Survey of Ireland as poor, generally unproductive, except for small local zones with low storage and limited recharge potential. Pumping tests carried out in October 2024 indicated low or slow recharge. Rainfall events showing no measurable effect on groundwater levels. This signals the aquifer's vulnerability to over extraction. As a result the ground water levels will fall, which may result in registered wells in the locality drying up. The Hydrogeological Assessment Report states, that within the vicinity of 2 km radius no registered wells are existing, yet this omits the fact that a number of local homes rely on historical, unregistered wells for water. The closest active well is located beside the ruins on the development site. This well has been used during the summers of recent years to pump fresh water to irrigate the crops. The existing pond is consisting of stale water contaminated with algae and has contrary to the statement in the Hydrogeological Report not been used for crops irrigation. Instead the adjacent well water was used. The report is based on the GSI database, but this database does not capture historic or private wells that are still in use. Local residents report historic wells in the area (the applicant's reliance on 'no registered wells' therefore falsely implies there are no private supply likely to be affected). Wexford County Council seems not to have treated the GSI's database absence as not proving absence of receptors as there are unregistered wells in the area.

A new 1.6 km water mains will be installed to supply mains water supplemented by pumps and booster pumps. These pumps are capable of extracting the mains water directly to the hotel development, reducing the level of water available to the residents of Kilmore Quay even further.

Currently Kilmore Quay is experiencing low water pressure and frequent water outages. WCC has not addressed this issue of adequate permanent water supply to the residents of Kilmore Quay.

The hydrological report derives Effective Recharge from long-term rainfall/PE figures (Met Eireann, Johnstown Castle station) and GSI recharge coefficients. But recent climate change has changed rainfall patterns, increasing winter extremes and summer draughts; the net effect is often lower effective recharge when and where it matters (summer tourism season). As a result the ground water levels will fall, which may cause registered wells in the locality to dry up. The Wexford County Development Plan and local climate risk assessments explicitly note coastal areas will face frequent storm surges and possible drought episodes.

The report's recharge calculations are based on historical averages and do not account for climate change impacts. DNV uses long-term mean rainfall and potential evapotranspiration to derive ER. However recent climate analyses and the Wexford County Council climate risk document warn of increased summer drought frequency and greater seasonality, (see a hosepipe ban from the beginning of August to the middle of September 2025 in County Wexford), more intense rainfall events that run off rather than infiltrate both reducing effective recharge of groundwater during dry seasons, when the hotel occupancy will be at its highest. The recharge used in supply calculations may be overestimated.

The Wexford County Development Plan 2022 – 2028 (Chapter 12) requires protection of vulnerable aquifers, sustainable abstraction and consideration of climate resilience – all of which are inadequately addressed in the application. Part of the site lies over high groundwater vulnerability zones. The single pumping test shows no saline intrusion during the test period, but long term increased pumping combined with sea level rise and seasonal low water levels could increase the risk of saline ingress into shallow coastal wells. The hydrological report's short test does not prove safety over decades of operation.

Localised ground water flow is complicated by fractured/feature bedrock and a mapped shear zone. DNV itself notes a shear zone and a localized groundwater flow pattern towards well 1. Pumping from new production wells could change local flow. The developer's monitoring network (3 observation wells) is too

small to confidently map heterogeneous flow over the 20.3 ha site and surrounding land.

The new development will have deep foundations over the length of the hotel, from the east to the south, parallel to the shore. A lower ground floor will be minus 3300 mm plus foundation below the ground floor. The indoor swimming pool will be located in the basement. Here the depth will be even more. In combination with the aforementioned and the foundations it may lead to obstruction of the underground water-flow. The water will find its way to lower ground, i.e. into the sea and thus softening the bank even further, which will lead to further erosion of an already fragile bank. In combination with rising sea levels future erosion will be inevitable. WCC is already spending a lot of money to protect the south east cost. The hotel development will be situated at a fragile coast. Erosion is very visible beneath the bank next to the development. Any further disturbances will accelerate the already visible erosion. The potential for indirect or unintended knock-on effects of the development upon the adjoining coastline requires close consideration.

Water Framework Directive

Following article 4 of the WFD there is a strong possibility that ground water and surface water of the hotel development during the construction phase and the operational phase may cause a deterioration of the water quality of the nearby coastal sea waters, particularly the bay between the St. Patrick's Bridge and the Little Beach in Kilmore Quay.

Sewage and Waste Water Treatment Capacity

The average water usage per person in Ireland is 133 liters per day according to Uisce Eireann. This figure includes both metered and unmetered water usage as well as allowances for potential leaks. The capacity of the waste water treatment plant is at present supporting a population of 850 people. Phase 2 construction of the modular expansion of the WwTP will provide a treatment capacity up to a population of 1900 (see AA and NIS Report, page 50)

However, given a conservative 90% of the 241.000 ltr/day return of the water usage into the WWTP water treatment plant, the number will be the equivalent to 1630 people. Adding to this the present local population of 447 people, the future capacity of the waste water treatment plant after expansion will have to cope with 2077 people instead of the recommended 1900 people. During the summer there will be an even higher number of people in the village exceeding the maximum load of the WWTP. Increase sewage load will raise

environmental and compliance risks under the EU water Directive like foul water run-off during the operational phase.

WCC is calculating with a discharge from the hotel of 744 PE. This is based on the number of hotel guests only, not on the anticipated daily water consumption of 241.000 litre which will increase the PE significantly. The figure of 744 PE does not mention, if it includes events, weddings, Spa, day guests, restaurant and cafe guests, guests of the lodges and employees residents.

Future development in Kilmore Quay

Another unwelcome consequence of the overloaded WWTP will be that local people, our children and grandchildren will not be able to build a home in Kilmore Quay. Any further economic or private developments like the proposed Industrial Enterprise Hub by WCC to support the local fishing industry close to the L 3056 and Ard Na Ba bypass would have to be suspended. This represents a grave concern for all residents of Kilmore Quay.

The Habitats Directive

The Habitats Directive (92/43/EEC) seeks to conserve natural habitats and wild fauna and flora by the designation of Special Areas of Conservation SACs and the Bird Directive (2009/147/EEC) seeks to protect the special importance of birds by the designation of Special Protection Areas - SPA's. National Heritage Areas (NHA's) are designations under the Wildlife Acts to protect habitats, species or geology of national importance such as St. Patrick's Bridge. Although many NHA designations are not yet fully in force under this legislation, they are offered protection in the meantime under planning policy which normally requires that planning authorities give recognition to their ecological value. The habitat directive article 6(3) and the Birds Directive article 4 (4) should be considered in respect of the hotel development.

The shoreline between St. Patrick's Bridge and the Little Beach is bordering on the Saltee Island SAC (000707), 14m South. The bank is part of the Saltee Island SAC. It would be detrimental for the shoreline and the numerous wading birds feeding throughout the year at this shoreline, if hotel guests climb down the bank towards the sea in order to walk to Kilmore Quay. WCC has made a condition (18) to prevent walkers from leaving the new walking path with signage or other deterrence measures. It should be a strong, durable fence lasting throughout the lifetime of the development.

Light Pollution

The Lighting Report submitted acknowledges extensive illumination for pathways, car parks, recreational spaces, buildings and the seafront interface. This artificial lighting will intrude on the night sky, impact human health, the quality of life of the residents and disrupt the natural behaviour of nocturnal species and in particular migratory birds! Dark Sky Ireland is promoting actively a dark sky for the benefit of humans and animals alike. The AA and NIS report states that there is the potential for light related disturbance leading to significant adverse effects on the SCI species of Seas of Wexford SPA and Saltee Islands SPA during Construction and operational Phase. The EIAR quotes (5.5.4.2.). 'Balcony lightning should be switched off as default, with the option to turn lights on given to the room's occupants using a timer switch'. It continues, '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'.

It is unreasonable to rely on the goodwill of hotel guests to be entrusted with implementing the mitigation measures.

Noise Pollution

The proposed development will generate prolonged and significant noise pollution. Construction is expected to last at least 3 years, involving heavy machinery, piling and haulage. Post completion, noise from deliveries, plant equipment, guest vehicles and on-site activities will permanently alter the peace and rural character of Kilmore Quay, affecting the resident's quality of life, their mental health and deterring nature based tourism like fishing and swimming. The AA and NIS report recognises on page 49 that 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.

Dust Pollution

The EIAR quotes on 4.5.1.4. 'There are several high-sensitivity residential dwellings located within 250 m of site boundary; these are situated to the north, east and west of the site'. It continues, 'Particles can be carried deep into the lungs where they can cause inflammation and a worsening of heart and lung diseases. It concludes 'the likely effects of air quality on population and human health will be negative short term and slight during the construction

phase'. Short term and slight are relative and could lead to severe implications for human health, particularly for children, the unwell and elderly in the population. DNV is relying on assumptions of mitigation and downplaying the obvious risks to human health in the interest of the development.

Impacts on migrating and nesting birds

Kilmore Quay is adjacent to the Saltee Islands SAC and APA, designated for seabird breeding colonies and migratory stopovers. Increased light, noise and human activity will interrupt nesting success and migratory behaviour. There are Curlews breeding at the bank just below the new development. The population of Curlews has been reduced by some 97% since the 1980s and the bird is protected. The NIS narrowly considers only the proposed development's direct effects. NPWS guidance and EU law require cumulative assessment with other plans/projects (e.g. other tourism or infrastructure works in Kilmore Quay, marina activities). This is especially important for light and noise impacts on birds, which accumulate across the development. NPWS and Birdlife research shows that even indirect disturbance (light visible from nesting areas, persistent noise from human activities) can alter seabird behaviour. The site's proximity to the coastline and open sightlines means lighting may be visible far offshore. 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.

Mitigating Measures

DNV concludes a number of assessments with the sentence: 'It is considered that the effects of above assessment on the surrounding population and human health will be negative, not significant and short term I nature'.
The AA and NIS report relies heavily on mitigation measures for dust pollution, noise pollution, light pollution, traffic congestion, dirty roads, impacts on human and bird life leading to the conclusion that there will be no adverse effects on site integrity. There is no guarantee in the application that these measures will be secured as enforceable planning conditions or monitored. Under article 6 (3) Habitats Directives, mitigation must be legally guaranteed before consent. The person or body in charge of implementation is not mentioned in the report, nor are the technical/scientific feasibility and degree of effectiveness expected of the proposed mitigation measures or the timing in relation of the project. The effectiveness of mitigation measures needs to be demonstrated, e.g. with reference to successful implementation in other similar

developments and monitored and by putting in place a system to monitor results and take corrective measures where failure are detected. Furthermore, there is no indication of limiting factors and rates of success or failure of the proposed measures. The AA and NIS assumes that once mitigation is applied, all effects vanish without modelling or monitoring to verify this and does not demonstrate that mitigation will be effective in reducing negative impacts below a level of significance. Measures are described using non-committal language such as 'where possible', 'should' or 'it is recommended', which does not provide the certainty required under Article 6 (3).

Here the question arises as to how the planning body can rely on assumptions and anticipations instead of facts? Sound mitigation measures should be insisted upon and enforced during the construction phase and the operational phase.

The AA and NIS report mentions on page 91 quote: 'All works carried out as part of the proposed Development will comply with the Statutory Legislation including the Local Government Acts, 1977 and 1990 and the contractor will cooperate fully with the **Environmental Section of Fingal County Council** in this regard.' To mention Fingal County Council instead of Wexford County Council sows doubt as to the originality of the findings and conclusions.

Traffic and Transport Assessment (TTA)

The TTA mentions under point 3.5 several points which WCC intended to introduce within the village. However, several of the proposed interventions were not implemented during the resurfacing of the road earlier this year by WCC

- No speed limit to 20 km/h on the R739 south of Ard Na Ba
- No shared spaces on the R739 south of Ard Na Ba
- No sections of new footway along R739 beyond the Saltee Coast Hotel
- Recent upgrade of the R739 from the Saltee Coast Hotel to the roundabout did not include a footpath or cycle path.
- Most of the L 3056 from the Harbour to Ard Na Ba is lacking a foot or cycling infrastructure..

The lack of above measures makes walking through the village is already hazardous. Adding the proposed traffic from the hotel will make it even less likely that hotel guest will choose to walk into the village.

A new section of pathway between Eco Beach and Ard Na Ba will not solve the lack of pavement between the Saltee Coast Hotel and the Harbour. Chapter 12.10.3 of the Development Plan requires coastal zone tourism projects to ensure safe and sustainable access, with particular provision for walking and

cycling. The proposed pathway between Eco Beach and Ard Na Ba and the remaining width of the R739 needs clarification as the road is too narrow to accommodate a new walk way and provide for 2-way traffic.

The developers plan to connect the resort with the village relies on a proposed coastal pathway and an historical so called mass path. Firstly, the necessary landowner's permission to cross private land has not been granted, rendering the mass path route from the resort to the village unenforceable. The costal path is historical from Kilmore Quay to Carne and most of this has now been eroded rendering this route also questionable.

Without it, visitors and staff will be forced onto a narrow rural road, increasing traffic hazards and undermining sustainable transport principles.

Heavy traffic from construction vehicles and anticipated operational traffic will impose undue wear on local roads, not designed for such intensity. The proposed road section details do not convincingly address how road degradation will be mitigated. Road wear, noise and vibration damage to dwellings and safety hazards for pedestrians and cyclists will all increase significantly. The TTA fails to demonstrate robust mitigation.

The TTA, 6.3.6., indicates a total daily external people trips by the proposed development of 2004 daily 2-way trips. Peak hours will be between 11 am to 12 pm and 3 pm to 4 pm. This is a major strain on the local roads. Point 6.3.1. assumes that 99 people will visit Kilmore Quay daily and 99 people will visit Wexford. This will add to the 2004 daily 2-way trips. On the one hand the developer relies on motor traffic and this further underscores the absence of infrastructure for safe walking or cycling, which is vital to protect pedestrians and maintain rural character and on the other hand, the Meinhardt report states, page 33, that 'residents visiting the village centre are anticipated to utilize the walking and cycling infrastructure provided.' There are no walking or cycling paths between the Coast Hotel and the Harbour. Furthermore, it is questionable that people will walk into Kilmore Quay particularly not during the long, cold and windy autumn and winter months. This will add additional traffic and strain on the local parking situation.

Meinhardt prepared the Environmental Impact Assessment Report. Chapter 13, page 37 states that the main road through the village of Kilmore Quay to the harbour area has not been considered in the study area. It states' Only road links where traffic is anticipated to increase by more than 10% are included in the study area'. The data was collected in August 2024, a peak period of traffic density. Comparing the additional 1034 daily 2-way trips with peak traffic data is more favourable than comparing with low density traffic as the percentage

will than increase to more than 10% and the R 739 might have to be included into the study?

The TTA, 6.8, TRICS Review is based on 407 bedrooms and the results of the TRICS assessment are shown in Table 6 – 15. The same TTA indicates under 1.4 the actual number of bedrooms in the hotel with 249 and in the 55 lodges with 202 bedrooms. This is a total of 449 bedrooms and not 407 bedrooms. Contradictory numbers of bedrooms within the same report does not inspire confidence into the various assumptions of the developers.

TTA, 6.2. Operational Assumptions

Quote: ' Residents v visitor usage of facilities:

- Pavilion Restaurant – 65 v 35%
- Spa -80% v 20%
- Farmstead café – 85% v 15%

Meinhardt have assumed, page 25, 'that no visitors would visit the hotel bars in isolation and this would always be linked with a restaurant booking.' This indicates that non residents or walk-ins are not welcome to use the bar facility. This is in direct contradiction to the 70% v 30% resident vs. visitors quota as stated on page 25, 6.2.

The WCC DP places heavy weight on Wexford policy support for tourism infrastructure. However, policy support for tourism does not remove the obligation to demonstrate the development is appropriate in scale and has adequate infrastructure and will not detract from Kilmore Quay's community's and heritage character and/or the environment.

Bearing in mind the hotel's 449 bedrooms plus 55 bedrooms for employees and an envisaged occupation rate of 1.8 people per room (see page 25) is a total of more than 744 guests staying per night. Kilmore Quay has a population of 447 people according to the last census. The new development will almost double the population of Kilmore Quay.

Meinhardt themselves state under table 6-15: TRICS Review: 'TRICS has included for hotel sites in Ireland (including Northern Ireland). Of the hotels included within the TRICS database it is noted that none are of a similar scale or provide similar integrated facilities to the proposed development'. If the above is correct, than No other hotel on the island of Ireland is of a similar scale!

The resort hotel is aiming for a 5 Star Hotel Status. The developer is stating, that he is in contact with several interested parties or operators to operate the hotel. Each operator determines it's own policy, which renders the developers assumptions for local use etc. extremely speculative if not totally invalid. 5 Star guests prefer exclusivity, which is not provided given the number of 449 bedrooms and 810 seating capacity in the various cafes and restaurants. The Resort is lacking any credible unique selling points apart from the Hotel's Spa which is in itself hardly unique. Most of the possible activities suggested in the above report are weather dependent summer activities, leaving the guests with few or no activities during the long autumn/winter months.

Recent reports (RTE, 13.August 2025; ITIC) highlights softening visitor demand and risk of overcapacity in certain accommodation sectors. The proposed scale of hotel is disproportional to Kilmore Quay's size and could displace trade from existing small businesses, contrary to Development Plan tourism objectives which prioritise complementing, not dominating developments. No independent, up to date market demand analysis has been provided. On the contrary the Meinhardt Traffic and Transport Assessment (TTA) relies heavily and primarily on assumptions and anticipations, see pages 4, 5.1; 5.2; 6.1; 6.2; 6.3; 6.3.1; 6.3.2; 6.3.3; 6.3.4; 6.3.5; 6.4.1; 6.4.2; 6.5; 6.6; 7.1; 7.3; 7.10.2; 7.11; 8.1; This raises questions, which WCC should address

WCC did not consider that if some or all of the many assumptions are inaccurate, that the hotel might not be an economic success, leaving local people to wonder what might happen to the building in this event?

DNV is responsible for most of the supporting reports, for example, the Hydrological Assessment Report, The Geological Assessment Report, The Waste Management Report, The Environmental Assessment Report, The Appropriate Assessment Screening and Natura Impact Statement Report, AA and NIS.
The DNV disclaimer reads 'DNV performs a technical assessment only. DNV specifically excludes any liability for opinions, estimates and advice herein given. The reports and any other DNV deliveries are based on information and documentation provided by Customer and information available in the public domain. DNV shall not be responsible or liable for the quality of the information and documentation that the report and/or any other DNV deliverables are based on.'

The Decision Makers Report relys solely on the information given in the reports paid for by the developer and hense suitable data to favour the developers project. A pre-planning meeting took place on the 23.09.2023 , see planners report and a 160 mm inlet pipe into the WWTP was installed during phase 1, see planners report Effluent Treatment.
The above is of serious concern and requires close consideration.

Privacy breach for local residents

The hotel rooms and particularly the 360* rooftop restaurant, as well as some of the lodges, have a direct view into gardens and living/bedrooms of local residences. Many hotel rooms, some lodges and the 360* rooftop restaurant have a direct view into my living room and garden. My living room is a mere 20m from the boundary. The buildings height of 18,54m would disproportionately tower over the surrounding residences. This is a breach of privacy impacting on the mental health, my quality of life and privacy of the residents. During winter month the sun will be partly blocked by the development resulting in loss of light, making the adjacent houses even darker than normal. The hotel with 5 floors will impose a change of view from my house, a very different view looking out onto several lodges and a 5 storey building from where people are looking into my house and garden.

The development dwarfs the resident population of Kilmore Quay. It's visual impact from the land side and the sea side would be profound and overbearing, creating an incongruous intervention and an overdevelopment of the site, incompatible with the coastal landscape next to the St. Patrick's Bridge and the harbor of Kilmore Quay. Failte Ireland states in their letter dated 08.09.2025 to WCC that the average hotel size in Wexford is 57 rooms, the new hotel development with 247 rooms is 4,5 times that size. On page 2 Failte Ireland clearly states 'The development of ancillary tourist accommodation including holiday homes on or adjoining the site will not be permitted.' The difference between a holiday home and a lodge is just semantics. The question is why WCC granted planning permission to 55 lodges/houses?

The development includes multiple restaurants, bars and cafes as well as small leisure facilities, competing directly with existing small scale local hospitality businesses. The result will be a concentration of tourist spend within the resort, reducing benefits to the wider village economy.

Chapter 6 of the WCC Development Plan emphasizes 'tourism developments that complements and supports existing local enterprises', not one that risks monopolizing the market.

Discrepancy of planning conditions

Condition 4 c and d

The Outline Construction Environmental Management Plan, page 13 mentions working hours 08:00 to 19:00 Monday to Friday and 08:00 to 14:00 on

Saturdays. WCC is granting working hours between 07.00 and 19.00 hours Monday to Friday and 07:00 – 16:00 hours on Saturdays. WCC is granting longer working hours. This is an inconsistency, which I would like to point out.

Condition 13

The proposed pathway between Eco Beach and Ard Na Ba and the remaining width of the R739 needs clarification as the road is too small to accommodate a new walk way and provide for 2-way traffic. Planning was granted despite the lack of any dimensions on the submitted drawings showing how this can be accommodated.

Condition 21

Refers to a multi-storey car park. The planning application does neither mention a multi-storey car park nor do the various drawings show a multi-storey car park?

How could this error occur?

Condition 22

WCC granted planning despite the lack of water supply agreement by Uisce Eireann.

1) A 1.6km of water network upgrades will be required. The applicant will be required to fund these local network upgrades.

2) It will be necessary to provide an upgrade of the existing Kilmore Quay WWTP to the Phase 2 future design horizon. The applicant will be required to fund these upgrades. However, condition 22 or any other condition do not mention any financial contribution of the above upgrades by the applicant.

Manfred Schulte-Austum

The Beak

Kilmore Quay

24.10.2025