S.37

File With

SECTION 131 FORM

Appeal No
PL-500109-WX

Defer Re O/H ☐

Having considered the contents of the submission dated/received **01/12/2025** from **Robert Roche** I recommend that section 131 of the Planning and Development Act, 2000 be/~~not~~ be invoked at this stage for the following reason(s):

New report enclosed

Section 131 not to be invoked at this stage ☐

Section 131 to be invoked — allow 2/4 weeks for reply ☑

Signed: Cathy Careton
EO

Date: 17/12/25

Signed
SEO/SAO

Date

Ms Murphy

Please prepare BP 70 xmas — Section 131 notice enclosing a copy of the attached submission.

To	Task No	Allow 2/3/4 weeks
Appellants, obs, PA 30x copies	CMS Activity	BP 70 xmas

Signed: Cathy Careton
EO

Date: 17/12/25

Signed: dm
AA

Date: 17/12/25

Response

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
Response	Robert Roche	01/12/2025	NotApplicable	No

Issue	Participant	Representative
BP20 —	Robert Roche	SCA Planning & Development Consultants

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

Comments
—

Filing

Attach to File ☐

Return to EO ☐

Signatures

Signed Cathy Carleton
Cathy Carleton, Executive Officer

Date 03/12/2025

Signed LM
Lauren Simone Murphy, Administrative Assistant

Date 3112125

Daniel O'Connor

From: Paula <Paula@scaplanning.ie>
Sent: Monday 1 December 2025 14:03
To: Appeals2
Subject: Response to Appeal Ref. 500109
Attachments: Response to Appeal Ref 500109 16 Appeals.pdf

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

To whom it may concern,
Please see a response to 16 no. 3rd party appeals made under Ref. 500109 attached.

I would be grateful if you would confirm receipt of the attached.

Regards,
Paula Shannon

SCA Planning
Unit 217 Glencullen House
Kylemore Road
Dublin 10

Office: 01-4569084
Mobile: 0877865473

SCA
PLANNING & DEVELOPMENT CONSULTANTS

The Secretary,
An Coimisiún Pleanála
64 Marlborough St
Dublin 1

1st December 2025

Re: Tourism Destination Resort Complex at Beak and Nemestown, Kilmore Quay, Co. Wexford.
Your Ref: ACP-Pl 500109
Wexford County Council Ref: 20250962W

Dear Sir/Madam,

I refer to your letter dated 6th November 2025 enclosing 17 sets of grounds of appeal submitted against the decision by Wexford County Council to grant permission for the above referenced development subject to conditions. This letter is a response to 16 no. of the appeals, see Appendix 1 for list of appellants, and a separate response has been prepared to the appeal made by Brendan O'Flaherty, with extensive grounds composed by Paula Redmond on his behalf, which require a detailed response (submitted simultaneously).

This response has been prepared in conjunction with SCA Architects, DNV Environmental Consultants, Meinhardt Consulting Engineers (Traffic), DRA Consulting Engineers (Civil), Jean O'Connell and Anthony O'Toole, Tourism and Hospitality Specialists.

An Comisiún Pleanala (hereafter ACP) has already been provided with a 1st Party Appeal requesting a 10-year permission to allow efficient completion of the development and with a response to a 3rd Party Appeal submitted by Catriona and Will O'Flaherty.

As almost all of the other 16 no. 3rd Party Appellants indicated addresses from the village and have identified similar issues, it is intended to respond to these remaining grounds of appeal on a remaining-themes basis, as many of the grounds are dealt with in detail in the responses to the O'Flaherty appeals.

Unit 217 Glencullen House,
Kylemore Road,
Dublin 10
Ireland
D10 TK30

Simon Clear B.A. Dip. T.P. MIPI
Darran Quaile B.A. MRUP MSc BLUP MIPI
Paula Shannon B.A. MRUP MIPI

Phone: 00-353-1-456 9084
E-mail: admin@scaplanning.ie
Website: www.scaplanning.ie
VAT Number: 4092398PH

Introduction to 3rd Party Appeal Responses

As noted in the introductory text to this response, a separate appeal response was prepared for the appeal by Catriona and Will O'Flaherty and submitted to ACP on the 14th November 2025. A response to the appeal submitted by Brendan O'Flaherty has been prepared under separate cover and is submitted concurrently with this subject, 16-party response.

It is suggested that the O'Flaherty appeals and responses be read first by the nominated Inspector, as these appeals are prepared in detail and responded to in detail.

In the interest of brevity, the same items are not repeated in each appeal response, and it is therefore requested that all 3 responses to the 3rd Party appeals are taken into consideration in the assessment and determination in respect of the proposed project.

Summary of Themes of 16 no. Appeals

The main relevant planning topics in the grounds of appeal are summarised as follows: -

Pre-Planning Stage and Due Consideration by Wexford County Council

It has been explained that the deign team conducted lengthy and detailed pre-application consultations and held an open-forum public consultation, which provided interactive feedback before the application was submitted. A detailed response to this item was included in the response to the appeal made by Will and Catriona O'Flaherty, please refer to this appeal response for more details.

Architectural Design Approach

The architectural design approach was fully explained in the Architectural Design Statement prepared by SCA architects and submitted with the application. None of the 16 No. appeals reference that document, so it is not evident it has been perused by any of the appellant parties.

SCA Architects have provided a description of the design approach, which is included in the response to the Brendan O'Flaherty appeal. Please refer to that appeal response for more details.

Tourism Concept and Viability

The concept has been described from the outset as a tourist destination resort. There are several very successful tourist destination resorts in coastal areas in Ireland, which do not overwhelm their location or locality and which contribute significantly to the local economy, to employment and to giving stability to the local village and rural communities. Examples include Kelly's Resort, Virginia Park Lodge, The Europe, Adare Manor, Castlemartyr, The Galgorm, Inchydoney, and Parknasilla.

Some observations suggest this type of development should go to more established tourism locations, such as the Wild Atlantic Way. However, this is ignoring the fact that Failte Ireland's initiative for tourism industry development in this part of Ireland, incorporating Wexford, is 'Ireland's Ancient East, to facilitate Wexford to progress to becoming a 'mature', more established tourism area with an associated robust tourism economy.

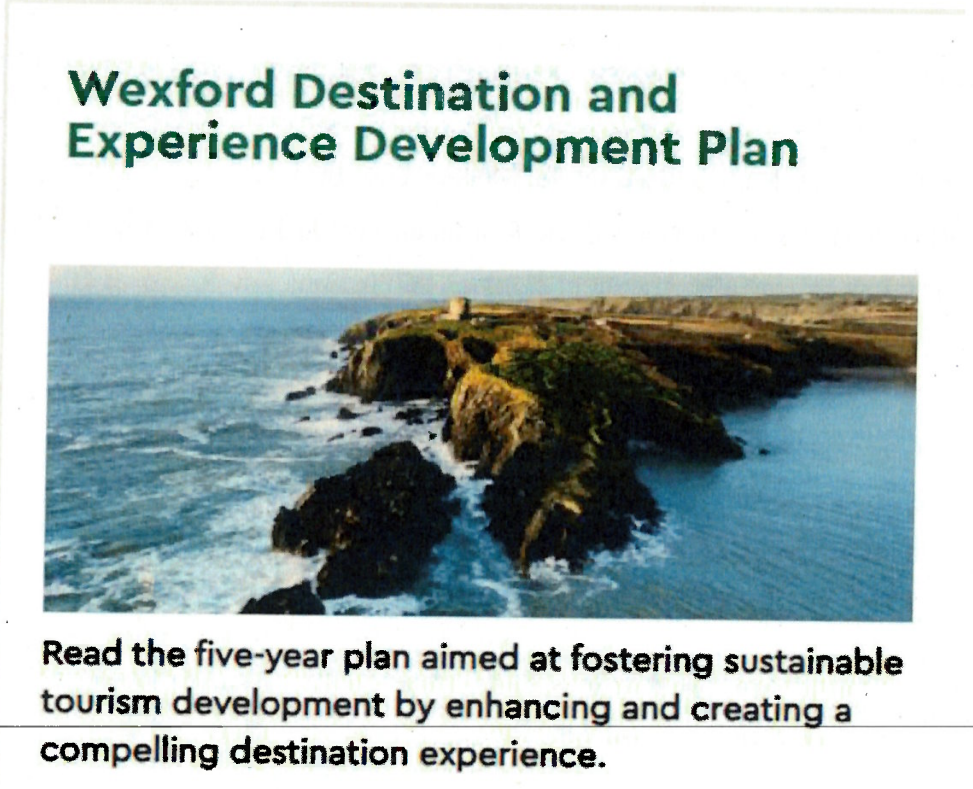


Figure 1 Wexford Destination and Experience Development Plan. Source: Failte Ireland

The Wexford DEDP, which is one of a number of such plans prepared by Failte Ireland in conjunction with coastal planning authorities, deals with growing tourism in Wexford, expanding the accommodation base and range, moving on from seasonal to year round

business, adding value by extending duration of stay and notes the WCDP encourages 'Tourism in Coastal Areas: *The plan seeks to support the development and promotion of coastal towns and villages in line with the County Wexford Tourism Strategy. Particular focus is made of the experience offering in Courtown, Curracloe, Rosslare, Kilmore Quay and the Hook Peninsula.* (Our emphasis added – underline)

To better understand the concept, please refer to the Kilmore Quay Integrated Tourism Report November 2025 (Appendix 2), which clarifies the integrated, environmentally responsible, tourism resort concept proposed. The resort facilities and activities are intended to keep visitors entertained on site with a longer dwell time and to complement the tourist resources based in the village. Neither the village centre nor the beach are the main focuses for visitor activities. The summer peak for tourism in Ireland is circa 6-weeks from the end of June into mid-August. The resort is designed as a 52-week operation as described in the tourism report.

The detailed response prepared by Jean O'Connell and Anthony O'Toole in Appendix 2 covers the following items: -

- Demonstrated Tourism need for the Modern Traveller;
- Scale, Viability, Local Context and Past Small Seasonal-Hotel Closures;
- Operators emerge after a grant of planning permission;
- Commitment to Eco-Tourism in the Resort Design and Management.

Whereas some appellants suggest that the absence of a named hotel operator not being identified is an inadequacy, it should be understood that planning permission inures to the benefit of the land and is not tied to a single user or operator.

The report included as Appendix 2 confirms that the operators require that permission is procured before committing and engaging following the grant of planning permission.

Connectivity and Access

Wexford County Council identified the historic linkage between Nemestown to the east and Kilmore Quay village to the west, requiring that the historic mass path connectivity should be reflected and facilitated within the site, with the eastern connection leading to the 'Norman Way' long distance walking route, facilitated along public roads from the site frontage along

the county road to the east. These reasonable requests by the planning authority have been facilitated.

Several appellants have indicated that they have blocked traditional routes to the west and they no longer exist; no permission to open/reopen them have been consented to. In respect of landowner consent it can be noted that the proposed development does not incorporate proposals for any development on any land that is not owned by the applicant or consented to. It should be clearly understood that, as per plans and particulars submitted with the application, which included 1 private landowner consent, no path exits the subject site onto any private land without consent.

The exit to Echo Beach roadway is to a public road in the charge of Wexford County Council, which will be upgraded and will accommodate cycle and pedestrian links only, supported by a financial contribution to WCC. A specific contribution to works to improve the condition of Echo Beach roadway has been included as a condition by WCC and has been accepted by the applicant – a similar condition is invited.

Road Safety Audit

The submission on behalf of residents in Echo Beach appears to misunderstand the purpose of a pre-application, independent Road Safety Audit. The audit is carried out independently by specialist road safety auditors to identify and raise potential safety issues with the applicant's road design engineers. The audit is sent to the applicant's roads design engineers and the issues are ironed out by them before the application is submitted. Therefore, the submitted design does not carry forward any of the issues identified in the audit – they are resolved before application.

Traffic Generation in the Heart of the Village

It has been clearly indicated in documentation submitted with the planning application that the vehicular access point to the proposed development is 1.1km from the heart of the village, located within the 60kph village speed limit. There is no need for general or service traffic to enter the centre of the village.

Local footpath infrastructure will be upgraded to provide links to existing footpaths, as agreed with the Area Engineer of Wexford Council during pre-application. Public consultation concluded in 2024 on measures proposed by Wexford County Council to make the central parts of Kilmore Quay safer for pedestrians and cyclists. The measures indicated by WCC have been taken into account.

Visual Impact Assessment

The pre-application consultation document from Wexford County Council indicated that existing hedgerows needed to be retained and bolstered, for heritage value, for biodiversity and visual assimilation purposes. Landscape Design for the project shows additional native planting to bolster hedgerows along all boundaries that are preserved in the interests of heritage value, ecology and biodiversity.

In terms of Visual Impact Assessment and mitigation, DNV have indicated the landscaping addition to hedgerow strengthening will be the first mitigation on the boundary, then within the site there is separation and the closest buildings to boundaries are of the same, domestic scale as neighbouring dwellings. Thereafter there is a transition in scale, with the main hotel building 126m away from the western boundary and aligned parallel to existing adjoining houses behind a 100m set-back, not blocking views to the coastline and marine. The site identified as suitable for an integrated resort development at 20.3ha is extensive enough, to accommodate the set-backs described above and has a relatively flat/sloping to the sea land profile that can accommodate the scale proposed without overpowering, overbearing or causing abrupt transitional changes close to boundaries

Access to Beaches

The following text is extracted from a document published on the Kilmore Quay website, which indicates there is no restriction on access to the beach, which is owned by the Government and requests that visitors follow the country code, as follows (identification of the NPWS Ranger by name and phone number has been deleted): -

Follow the Country Code when visiting the Nemestown shore

There are no restrictions on pedestrians accessing the foreshore from the village of Kilmore Quay. Ownership of the shore is vested in the State. Visitors can help conserve the biodiversity of the protected area by following the Country Code.

• *Leave the area as you found it. Do nothing to destroy the wonderful amenity you have come to enjoy. Kill nothing but time; take nothing but memories and photographs; leave nothing but footprints.*

• *Take your rubbish home with you; bag it and bin it.*

• *Protect rock outcrops by not hammering on them or damaging them.*

• *If you turn over stones to see seashore life, please turn them back again and leave them as you found them. Doing so avoids killing the creatures that live on top of the stones by not covering them and those that live on the underside by not exposing them.*

The protected area is managed by the National Parks and Wildlife Service (NPWS). If you see any other threats of concern to the Kilmore Quay Community Development Association please report them at the reception desk in the Stella Maris Centre in the village. Otherwise email reception@stellamariscentre.com or telephone 053 912 9922.

Note that Ballyteige Burrow is located on the opposite side of Kilmore Quay village, c.670m from the western site boundary. It is 9 kilometres long and is also owned by the state and is managed by the OPW with public car parking provided and no particular restriction on access.

Otters and Buzzard

In response to the identification of Otters and Buzzard in several appeals, while otters have been seen in the wider area, given they are widespread throughout all waterbodies in Ireland, no holts were found during the ecological site inspections.

The wet drainage ditch on the east of the site connected to the shoreline to the south of the site, will be ecologically enhanced and there will be new cover for otters on the lands that will convert from arable farmland to parkland.

That persons have seen something of interest on occasion, off-site, does not mean that the EIAR inspections on the site by ecologists have not been properly carried out or that there is necessarily a direct link to removal of occasional wildlife from the area.

Water Supply - Groundwater and Mains Supplies

As documented in the Civil Engineering Planning Report (DRA, 2025 submitted with the planning application), water supply for the Proposed Development will be from an onsite supply served by 2 no. proposed groundwater wells with a supplementary back-up mains supply from UE. This supplementary supply will feed into a drop tank to prevent backflow into the mains water system as agreed with UE (24-hour water storage will be provided on site).

The UE confirmation of feasibility in respect of water supply indicates that a 1.6km upgrade of water supply network infrastructure would be required to support the development which would be funded by the developer. This upgraded supply would also augment the overall supply into the Kilmore Quay settlement area.

The use of a groundwater supply will reduce the demand for treated water from the UE supply and will therefore improve the supply available to others in Kilmore Quay. This is a sustainable approach. It should be understood that there are 2 No. existing agricultural wells on the lands and the drawdown indicated is not totally new demand on the aquifer.

It is considered that the proposed groundwater abstraction will have a negligible effect on other groundwater supplies or the overall bedrock aquifer resource.

The developer-funded water supply upgrade will improve water supply and pressure to Kilmore Quay Village generally in addition to supporting the proposed development in times of reduced groundwater supply. This is a clear community benefit.

The grounds of appeal that suggest groundwater testing should have occurred during the dry summer season overlook the fact that the development can be supplemented by, or indeed be fully sustained, from the upgraded UE supply during dry spells and as required throughout the operational phase. However, the on-site groundwater supply system is designed to minimise reliance on treated UE water resources. Please refer to the detailed engineering response included in the Brendan O'Flaherty appeal response.

A standard, appropriate condition is requested relating to UE water supply and foul water drainage arrangements.

Note, hosepipe bans in Ireland in 2025 applied to the entire country, not just to Kilmore Quay. The Government has announced, 6th November 2025, an extra €200 million to be made available to UE to bolster domestic supplies and servicing for residential development. Kilmore Quay is ahead of the loop, having had the WWTP plant upgraded in recent years and a developer undertaking to enhance water supply to the benefit of the entire village.

Foundations affecting groundwater flows

The main hotel structures will be piled, with ground beams well above groundwater levels, meaning foundations will not intersect or affect groundwater flows. Please refer to the detailed engineering response included in the Brendan O'Flaherty appeal response.

Lighting and Light Pollution

The applicants are fully aware of the sensitivity to nocturnal light and the extensive, low elevation site can accommodate suitable lighting in the interests of normal health and safety values, while not affecting or confusing birds or bats. The helpful suggestions of An Taisce are noted in this regard. A condition to agree tone, colour and warmth of lighting with WCC, is invited.

It is also noted that Kilmore Quay is an urban settlement with public and private lighting. It has recently added a lit promenade and has extensive car parking alongside the commercial harbour and marina. There are significant commercial processing and warehousing buildings that are intensively lit. Finally, there is the floodlit commercial fishing harbour operated to tides (day and nighttime activity) and is floodlit with intensive lighting.

Bird-strike Potential

The elevations to the central hotel building were represented in elevations as required for validation purposes. It is inevitable and essential that south-facing glazing in large public and workplace settings would be tinted to reduce internal sun glare and solar heat gain. This would be required for Building Regulations compliance in any event, which arises under a separate code. Tinting will reduce the 'see-through' risk for birds. Brises soleil are also recommended to reduce undue solar heat gain and, if fitted, would reduce the potential 'see-through' effect.

CEMP

The preliminary CEMP was adequately prepared to address construction stage impacts.

A standard condition may be applied requiring the agreement of the CEMP with Wexford County Council prior to commencement.

Traffic Planning Approach

Please refer to the Meinhardt Traffic and Access Response, Appendix 3, which clarifies the construction and operational traffic measures that ensure the village centre is not overloaded or impacted by traffic generation. In respect of construction stage HGV activity on the local roads, it should be noted that Kilmore Quay is an active commercial fishing port, with an industrial estate including maintenance and repair industrial units, with fish processing and fish direct sales trucks generating regular HGV transportation on the network.

The recent construction of the Ard na Ba link road has relieved village centre traffic and facilitated a traffic circuit to relieve traffic at the harbour/village centre.

Traffic speed control, traffic calming and safety measures, including works, in the village are indicated in the Kilmore Quay Village Traffic Management Plan (draft 2024), which has passed through public consultation and which has been taken into account in the design and in the response prepared to deal with appeal traffic issues. The detailed works plans (14 sheets of improvements) also shows a HGV access routing to and from the harbour and industrial areas, as shown below.

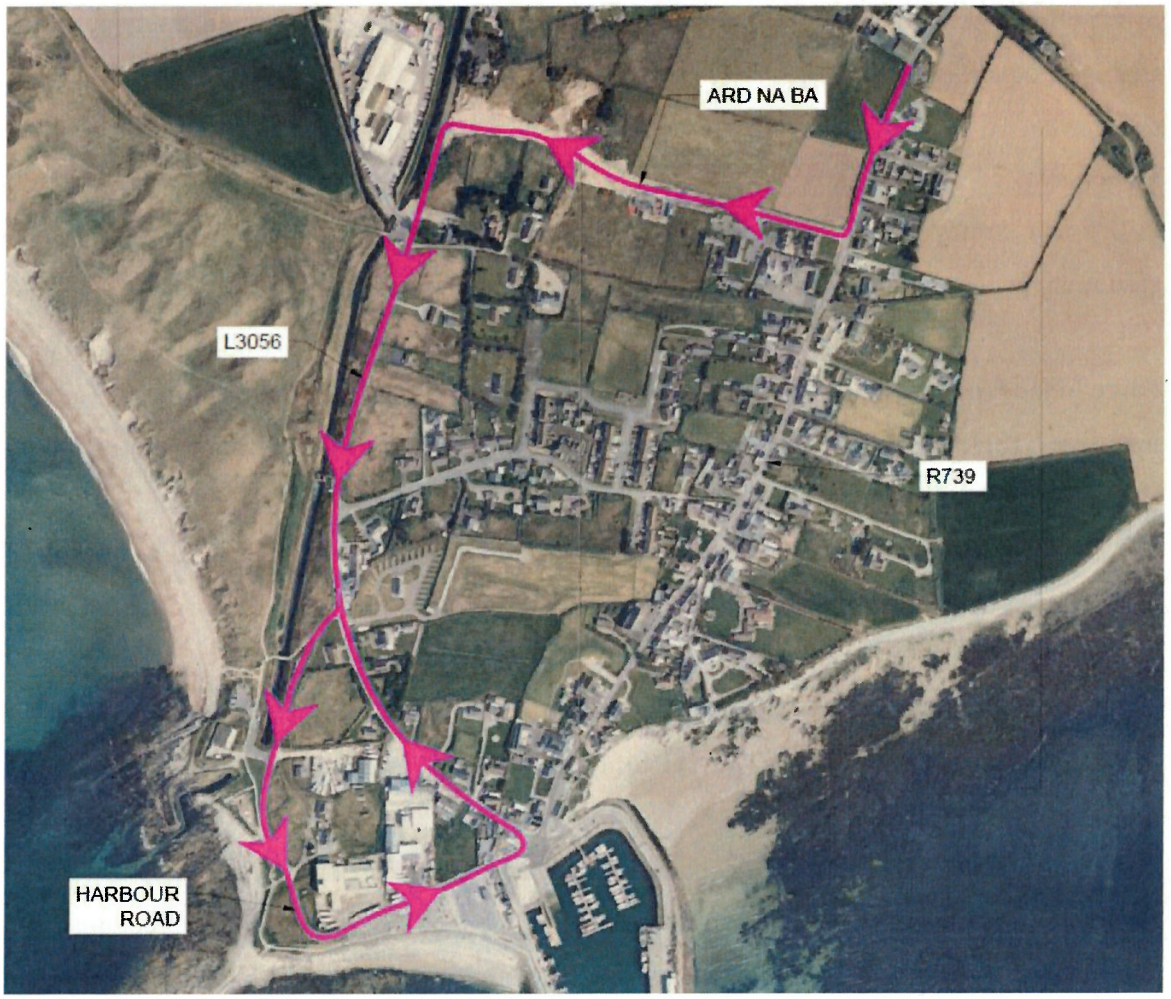


Figure 2 Kilmore Quay Village Traffic Management Plan HGV's Route.
Source: Wexford County Council

The construction of the Kilmore Quay Waste Water Treatment Plant, remote pumping stations and collector drains was carried out in recent years, requiring extensive off-site works throughout the village so, the capacity of the village to accommodate construction stage traffic is already demonstrated.

Extensive car parks and public realm works have been completed in the village centre in recent times.

Offsite works referred to in the Meinhardt Traffic and Access response refers to works agreed with the Wexford County Council area engineer to be carried out on lands in the control or

ownership of Wexford County Council. No private 3rd party lands are involved in any proposed road or footpath improvements.

Conclusion

Policy and strategy at all levels supports development for a greater population and a self-sustaining economy, which includes a significant tourism sector.

Failte Ireland, as the National Tourism Authority, have published the Wexford Coastal Tourism initiative (DEDP 2025) and supports this particular development with a submission on file.

Infrastructure inadequacies described in the grounds of appeal will be remedied as a result of the proposed development to the benefit of the entire community.

The proposed development is supported by local service businesses, with submissions on file that have identified a strengthening of viability, employment and profitability in the village.

The current Wexford County Development Plan, noting the weakening of the local traditional fishing industry, has identified the future redevelopment of the village and its economy and stabilising the settlement rests with the marine economy in general, including marine tourism and recreation, not just relying on fishing, and in landside tourism development.

The planning application was very well and interactively prepared with consultations with statutory bodies, with the community and businesses. There is widespread community and business support. Local knowledge indicates that a number of appellants are not permanent members of the resident village community and some are visitors/renters of holiday lets and some have holiday homes, so their interests in preserving stasis may not reflect the support of the resident village community. All individual objectors have every right to make their case and our responses respect that right.

However, planning is about the future, supported by UE servicing infrastructure and as set out in statutory plans. The application and the response to appeals is forward-looking and has identified the supporting policies, objectives, sustainability, climate change adjustments, infrastructure developments, change to renewable sources of energy that will bolster the south

of Ireland and a shift to domestic and international tourism not based on air travel, or solely on Internal Combustion Engine (ICE) car travel.

Request for Permission

A normal condition requiring giving effect to the mitigation measures proposed and included in the application, can be included by ACP.

Other conditions invited throughout this response can be attached as ACP considers appropriate.

Taking the above into account, it is requested that permission be granted with 10-year duration and with the attachment of appropriate conditions.

Yours sincerely,

Simon Clear

Appendices

1. List of 16 Appellants
2. Kilmore Quay Integrated Tourism Report November 2025 by Anthony and Jean
3. Meinhardt Traffic and Access Response Report November 2025

Appendix One

List of 16 Appellants

- John and Margaret Nunn, Seascape, Kilmore Quay, Co. Wexford
- Marian Doyle, Sunnyside, Kilmore Quay, Co. Wexford
- Angela Hilbrecht, Libgate House, Kilmore Quay, Co. Wexford
- Manfred Schulte-Austum, The Beak, Kilmore Quay, Co. Wexford
- U Bohle, Bastardstown, Kilmore, Co. Wexford
- Anthony Matthews, Cilhan, Nemestown, Kilmore Quay, Co. Wexford
- Lorraine Gunning, 2 Saltee View, Kilmore Quay, Co. Wexford
- Rosemary Spelman, 5 The Ranch, Rosslare Strand, Co. Wexford
- John and Lorraine Smiley, 21 Crossfarnogue Villas, Kilmore Quay, Co. Wexford
- Therese Maddock, 13 Ard na Ba, Kilmore Quay, Co. Wexford
- Helen and John Cousins, Kilmore House, Ballask, Kilmore, Co. Wexford
- John Kennedy and Catherine Langan, Soldiers Cottage, The Beake, Kilmore Quay, Co. Wexford
- Andi McGarry and Lisa and Philippa Kinneen, The Morrings, Kilmore Quay, Co. Wexford
- Emilie Jost, Joyce's Farmhouse, Chapel Gardens, Kilmore Quay, Co. Wexford
- Conor and Anne Horgan, 5 Echo Beach, Kilmore Quay, Co. Wexford
- Bernhard and Franziska Patow, An Teach Oilean, Crossfarnoge, Kilmore Quay, Co. Wexford

SPARKING BOLD IDEAS
ACROSS
FOOD AND DRINK
SUSTAINABILITY
TOURISM
EVENTS AND
HOSPITALITY DESIGN

PROFESSIONAL MEMBERSHIPS

Slow Food International
Euro-Toques Ireland
Institute of Directors of Ireland
International Association of Culinary Professionals
Talamh Beo
Irish Guild of Sommeliers of Ireland
World Food Travel Association
United Nation's SDG2 Advocacy Hub, Chefs' Manifesto
Irish Food Champions Assembly

ANTHONY O'TOOLE

MSc, BA (Hons), Adv Dip, WSET, Irish Food Champion

+353 (0)86 2212217
hello@anthonyotoole.com
anthonyotoole.com

Taoibh Coille
Ballymore
Camolin
Enniscorthy
County Wexford
Ireland Y21 RD60

ANTHONY O'TOOLE

KILMORE QUAY INTEGRATED TOURISM RESORT

Planning Application 20250962W

Friday, 21 November 2025

Tourism Need, Scale and Policy Response

This response has been prepared with input from **Jean O'Connell** and **Anthony O'Toole**, both highly regarded specialists within the Irish hospitality and tourism sector. They work independently of one another and regularly collaborate with Fáilte Ireland, Tourism Ireland, local authorities, hotels, sustainable tourism experiences and destination development projects across rural and coastal Ireland. Their combined expertise in consumer insight, tourism and hospitality market trends, destination development and operational best practice ensures that the commentary provided is grounded in genuine market evidence and contemporary visitor behaviour.

Both experts were commissioned to prepare the comprehensive **Social, Community, Environmental, Tourism and Economic Impact Report** for the Kilmore Quay Integrated Tourism Resort and worked closely with the planning and design teams to ensure that the proposed development is commercially viable, capable of attracting diverse domestic and international markets, and positioned to become a distinctive and sustainable tourism destination for both Wexford and Ireland.

The following pages set out our response to the observations made.

AOT

SPARKING BOLD IDEAS
ACROSS
FOOD AND DRINK
SUSTAINABILITY
TOURISM
EVENTS AND
HOSPITALITY DESIGN

PROFESSIONAL MEMBERSHIPS

Slow Food International
Euro-Toques Ireland
Institute of Directors of Ireland
International Association of Culinary Professionals
Talamh Beo
Irish Guild of Sommeliers of Ireland
World Food Travel Association
United Nation's SDG2 Advocacy Hub, Chefs' Manifesto
Irish Food Champions Assembly

ANTHONY O'TOOLE

MSc, BA (Hons), Adv Dip, WSET, Irish Food Champion

+353 (0)86 2212217
hello@anthonyotoole.com
anthonyotoole.com

Taoibh Coille
Ballymore
Camolin
Enniscorthy
County Wexford
Ireland Y21 RD60

ANTHONY O'TOOLE

1. Demonstrated Tourism Need for the Modern Traveller

The proposed development has always been positioned as a **tourism destination coastal resort**, not a conventional hotel. Several highly successful destination resorts operate in rural or coastal Ireland without overwhelming their locality and have, over decades, contributed significantly to local economies, sustained year-round employment, and strengthened community stability. Examples include Kelly's Resort, Virginia Park Lodge, The Europe, Adare Manor, Castlemartyr, The Galgorm, Inchydoney, and Parknasilla.

The design and amenity mix for the Kilmore Quay Integrated Resort has been intentionally developed not to replicate or compete with these established destinations, but to create something **genuinely unique as a new economic driver for Wexford**: a resort that reflects the unique coastal surroundings of Kilmore Quay, the county's maritime and island heritage, and Wexford's strong food and hospitality identity. Market research undertaken for the Impact Report confirms a clear gap in County Wexford for a full-service, four-season, experience-led coastal resort of this nature.

Despite strong year-round visitor numbers, Wexford currently has **no premium resort** offering the combination of **outdoor and marine activities, wellness, food-led experiences, event capacity, and diverse accommodation types** required by the modern traveller. This development is therefore specifically designed to fill that strategic gap, offering a distinct product shaped around the landscape, character, environmentally sensitivity and strengths of Kilmore Quay.

Fáilte Ireland's formal submission to Wexford County Council for this planning application (dated 8 September 2025) strongly supports the development, describing it as a **"transformative opportunity for Wexford tourism"** with the potential to become a **destination in itself** - benefiting both the village and wider region.

Fáilte Ireland confirms that the proposal aligns with:

- **Ireland's Ancient East** r egional strategy
- The **Wexford Destination and Experience**

SPARKING BOLD IDEAS
ACROSS
FOOD AND DRINK
SUSTAINABILITY
TOURISM
EVENTS AND
HOSPITALITY DESIGN

PROFESSIONAL MEMBERSHIPS

Slow Food International
Euro-Toques Ireland
Institute of Directors of Ireland
International Association of Culinary Professionals
Talamh Beo
Irish Guild of Sommeliers of Ireland
World Food Travel Association
United Nation's SDG2 Advocacy Hub, Chefs' Manifesto
Irish Food Champions Assembly

ANTHONY O'TOOLE

MSc, BA (Hons), Adv Dip, WSET, Irish Food Champion

+353 (0)86 2212217
hello@anthonyotoole.com
anthonyotoole.com

Taoibh Coille
Ballymore
Camolin
Enniscorthy
County Wexford
Ireland Y21 RD60

ANTHONY O'TOOLE

Development Plan (DEDP) 2025-2030

- **TM48** and **TM50** of the **Wexford County Development Plan 2022-2028**

It is also important to clarify the interpretation of the term "**niche**", which has been referenced repeatedly in appellant submissions. "Niche" does not automatically mean small or low scale. In tourism and policy terms, niche refers to a specific segment of the market that is currently unmet or underprovided for. In this case, the proposed development addresses a clear gap in Wexford's tourism offering - the absence of a full-service, four-season, experience-led coastal resort. The project therefore represents a distinct "destination resort niche" that is not currently catered for anywhere in this part of the county.

The scale of the resort flows directly from the requirements of modern travel patterns. Today's visitor market requires varied accommodation and flexible space to serve:

- solo travellers and digital nomads seeking sustainable nature-based work and leisure settings
- couples on short breaks
- young families needing family suites
- multi-generational groups and friends staying in family suites and lodges
- wellness and activity groups requiring longer dwell times
- corporate and organisational groups seeking training, team-building, and off-site meeting locations
- people with accessibility needs

To serve these markets and to operate year-round, the resort requires a range of indoor and outdoor amenities including a spa, pool, padel courts, mini golf, fitness and leisure facilities, and family-friendly recreation. These amenities ensure guest activity is self-contained, well-managed, and sustainable, reducing pressure on local beaches, roads, and village infrastructure. The resort will also act as a platform for local tourism, craft, food, and wellness providers, who will be able to offer services and experiences within the resort.

Importantly, without this amenity mix and scale, the resort would not be commercially viable as a four-season destination. Smaller or limited-service hotels - such as those that

AOT

SPARKING BOLD IDEAS
ACROSS
FOOD AND DRINK
SUSTAINABILITY
TOURISM
EVENTS AND
HOSPITALITY DESIGN

PROFESSIONAL
MEMBERSHIPS

Slow Food International
Euro-Toques Ireland
Institute of Directors of Ireland
International Association of Culinary Professionals
Talamh Beo
Irish Guild of Sommeliers of Ireland
World Food Travel Association
United Nation's SDG2 Advocacy Hub, Chefs' Manifesto
Irish Food Champions Assembly

ANTHONY O'TOOLE

MSc, BA (Hons), Adv Dip,
WSET, Irish Food Champion

+353 (0)86 2212217
hello@anthonyotoole.com
anthonyotoole.com

Taoibh Coille
Ballymore
Camolin
Enniscorthy
County Wexford
Ireland Y21 RD60

ANTHONY
O'TOOLE

previously closed in Kilmore Quay - cannot sustain year-round operations in this location.

Key Need and Policy Alignment Points

- Wexford currently lacks a resort-style accommodation product, despite welcoming 962,000 domestic visitors in 2024 and recording strong year-round tourism activity.
- Kilmore Quay is identified as a priority coastal tourism location in the DEDP.
- Wexford is now actively targeting the international market, and additional high-quality accommodation and event capacity is required to service this growth sector.
- The resort provides the diversity of room types, family options, group accommodation, and accessibility features required to meet the needs of today's domestic and international traveller.
- On-site amenities help reduce pressure on beaches, parking, and village infrastructure.
- Accommodation growth outside Wexford's main towns is critical to achieving regional tourism goals.
- The proposal advances the aims of Ireland's Ancient East by increasing dwell time, promoting Ireland's heritage and deepening visitor experience.
- As Wexford is one of Ireland's primary ferry ports, the resort will help retain international visitors in Wexford, rather than losing them immediately to the Wild Atlantic Way.

2. Scale, Viability, Local Co ntext and Past Hotel Closures

Some observations reference past hotel closures in Kilmore Quay (the Wooden House and the Coast Hotel), implying these failures demonstrate that hotel development is unsuitable for Kilmore village. In reality, they demonstrate the opposite: **small, seasonal hotels without sufficient indoor amenity, scale, or a year-round offer are not viable in this location.** Their closure is fully consistent with wider trends across rural Ireland, where traditional small hotels struggle outside the peak summer period. What is required - and what the market now expects - is

SPARKING BOLD IDEAS
ACROSS
FOOD AND DRINK
SUSTAINABILITY
TOURISM
EVENTS AND
HOSPITALITY DESIGN

PROFESSIONAL MEMBERSHIPS

Slow Food International
Euro-Toques Ireland
Institute of Directors of Ireland
International Association of Culinary Professionals
Talamh Beo
Irish Guild of Sommeliers of Ireland
World Food Travel Association
United Nation's SDG2 Advocacy Hub, Chefs' Manifesto
Irish Food Champions Assembly

ANTHONY O'TOOLE

MSc, BA (Hons), Adv Dip, WSET, Irish Food Champion

+353 (0)86 2212217
hello@anthonyotoole.com
anthonyotoole.com

Taoibh Coille
Ballymore
Camolin
Enniscorthy
County Wexford
Ireland Y21 RD60

ANTHONY O'TOOLE

a **distinct, experience-rich and resilient hospitality model** capable of operating throughout all seasons.

The Kilmore Quay Integrated Resort has been designed to provide precisely this: **a world-class, differentiated coastal offering in the proposed location** with the scale, amenities, food and marine identity, wellness facilities, marine experiences, and accommodation diversity necessary to succeed where smaller hotels could not. The design is intentionally crafted to reflect the strengths of Kilmore Quay and to complement - not compete with - existing tourism and hospitality businesses in the area. The resort requires the support of local businesses of publicans, retail shops, experience providers, etc.

Crucially, the resort's scale enables a **balanced and sustainable revenue model** across accommodation, food and beverage, wellness, events, and outdoor/experiential activities. This multi-stream model is essential to deliver:

- long-term, year-round employment
- stable commercial operations
- continuous reinvestment into the local economy
- services and amenities that the community can also access throughout the year

The proposed development therefore reaches the **sufficient operational threshold** required for a four-season destination resort, ensuring that all experiences can operate consistently for the community, visitors, and tourists.

The resort responds directly to the historic challenges experienced by small hotels in Kilmore Quay by providing the **minimum viable scale** required for long-term sustainability. It creates it as a stand-alone destination. This aligns with decades of proven practice in rural Ireland and internationally, where successful destination resorts integrate sensitively into village environments while contributing significantly to the local community, environment, and circular economy. We can see this at well-known small villages where Adara Manor, Castlemartyr, Galgorm and Virgina Park Lodge are located.

The resort is designed to open with **120–200 direct jobs in Year One**, supported by on-site staff accommodation to attract and retain talent. The staff village enables partnerships with

AOT

SPARKING BOLD IDEAS
ACROSS
FOOD AND DRINK
SUSTAINABILITY
TOURISM
EVENTS AND
HOSPITALITY DESIGN

PROFESSIONAL
MEMBERSHIPS

Slow Food International
Euro-Toques Ireland
Institute of Directors of Ireland
International Association of Culinary Professionals
Talamh Beo
Irish Guild of Sommeliers of Ireland
World Food Travel Association
United Nation's SDG2 Advocacy Hub, Chefs' Manifesto
Irish Food Champions Assembly

ANTHONY O'TOOLE

MSc, BA (Hons), Adv Dip,
WSET, Irish Food Champion

+353 (0)86 2212217
hello@anthonyotoole.com
anthonyotoole.com

Taoibh Coille
Ballymore
Camolin
Enniscorthy
County Wexford
Ireland Y21 RD60

ANTHONY
O'TOOLE

leading hotel and culinary schools such as **Shannon College of Hotel Management** and **Technological University Dublin**, offering training, internships, and local career pathways. In addition, the appointed international operator will provide ongoing training and operational support, ensuring the resort evolves in line with consumer trends and maintains commercial viability. These staff would travel in and stay onsite in the staff village and socialise with employees to foster team engagement.

Importantly, the initial job estimate is a **starting baseline**, not a ceiling. As the destination matures, builds momentum and repeat visitation, expands its programming, and grows its corporate, wellness and events calendar, employment levels are expected to increase steadily, mirroring the trajectory of other successful destination resorts across Ireland.

Concerns that the resort assumes 100% occupancy are also unfounded. No resort of this nature operates at full occupancy, nor would it be operationally desirable. Destination resorts require a buffer of rooms to accommodate:

- different guest group sizes and types
- turnover between stays
- maintenance and servicing
- deep cleaning cycles
- early/late check-ins and check-outs
- guest relocations or room issues

The operational model anticipates natural seasonality, aligned with Fáilte Ireland's regional patterns. The resort's diverse market mix - including midweek corporate retreats, wellness breaks, experiential travel, longer-stay lodge bookings, and family holidays - ensures a balanced spread of occupancy across the week and year. This reduces environmental pressure, avoids weekend traffic surges, and supports a sustainable rhythm of activity within the village.

The resort will also deliver wider community and regional benefits:

- **Capacity for workshops, events, and cultural programming** that local groups can access
- **Tourism anchor effect** supporting cafés, pubs, restaurants, accommodation providers, guides, and

SPARKING BOLD IDEAS
ACROSS
FOOD AND DRINK
SUSTAINABILITY
TOURISM
EVENTS AND
HOSPITALITY DESIGN

PROFESSIONAL MEMBERSHIPS

Slow Food International
Euro-Toques Ireland
Institute of Directors of Ireland
International Association of Culinary Professionals
Talamh Beo
Irish Guild of Sommeliers of Ireland
World Food Travel Association
United Nation's SDG2 Advocacy Hub, Chefs' Manifesto
Irish Food Champions Assembly

ANTHONY O'TOOLE

MSc, BA (Hons), Adv Dip, WSET, Irish Food Champion

+353 (0)86 2212217
hello@anthonyotoole.com
anthonyotoole.com

Taoibh Coille
Ballymore
Camolin
Enniscorthy
County Wexford
Ireland Y21 RD60

ANTHONY O'TOOLE

marine businesses

- **Year-round economic uplift**, not concentrated seasonal impact
- **Complementary offering**, designed to strengthen - not compete with - existing businesses.

In summary, the historical closures of small hotels in Kilmore Quay highlight the need for a **properly scaled, four-season, amenity-rich resort**. The proposed development addresses this need directly, ensuring viability, resilience, and sustained economic benefit to the village and wider region.

3. International Operator

The Kilmore Quay Integrated Resort has been designed for a **single, experienced international hospitality operator**, reflecting best practice for 4- and 5-star destination resorts. A unified operator ensures consistent service standards, cohesive branding, efficient staffing, and strong year-round operational performance. It is standard industry practice not to appoint an operator before planning permission is secured, as operators require planning certainty and a confirmed design envelope before entering contractual agreements.

The operational model has been shaped with input from insights and knowledge from industry experts Jean O'Connell and Anthony O'Toole, ensuring the resort meets contemporary market expectations, future insights and is attractive to leading operators. Confidential initial engagement has already taken place, with several operators expressing interest subject to planning approval.

Key Points

- A single-operator model is industry best practice for premium destination resorts.
- Operators are not appointed pre-planning; planning certainty is required first.
- Premature operator appointment would be commercially risky and is not a planning requirement.

AOT

SPARKING BOLD IDEAS
ACROSS
FOOD AND DRINK
SUSTAINABILITY
TOURISM
EVENTS AND
HOSPITALITY DESIGN

PROFESSIONAL MEMBERSHIPS

Slow Food International
Euro-Toques Ireland
Institute of Directors of Ireland
International Association of Culinary Professionals
Talamh Beo
Irish Guild of Sommeliers of Ireland
World Food Travel Association
United Nation's SDG2 Advocacy Hub, Chefs' Manifesto
Irish Food Champions Assembly

ANTHONY O'TOOLE

MSc, BA (Hons), Adv Dip,
WSET, Irish Food Champion

+353 (0)86 2212217
hello@anthonyotoole.com
anthonyotoole.com

Taoibh Coille
Ballymore
Camolin
Enniscorthy
County Wexford
Ireland Y21 RD60

ANTHONY O'TOOLE

- Resort design and experience mix were shaped with expert input to ensure operator viability.
- Multiple qualified operators have already indicated interest, subject to permission.
- After permission, a competitive procurement process will appoint the most suitable operator.
- This approach ensures best market fit and supports long-term community and economic benefit.

4. Commitment to Eco-Tourism in the Resort Design and Management

Kilmore Quay Integrated Resort has been designed as a **low-impact, environmentally responsible destination**, reflecting both the sensitivity of its coastal setting and Ireland's national commitments to sustainable tourism growth. Sustainability is embedded throughout the concept, masterplan and future operational model, ensuring that the resort enhances the natural environment and aligns fully with national and regional tourism and climate-action policies.

The resort design directly supports the **Wexford County Development Plan 2022-2028**, the **Wexford Destination and Experience Development Plan 2025-2030**, **Tourism Ireland's Global Marketing Strategy**, and **Fáilte Ireland's Climate Action Roadmap for Tourism Businesses** - all of which emphasise responsible tourism, reduced environmental impact, increased dwell time, and the sustainable dispersal of visitors across rural Ireland. These principles are outlined in detail in the **Impact Report** that was sent with the planning application.

<u>Key Eco-Tourism Principles in the Resort Design</u>

- **Low-impact architecture** using natural materials, green roofs, solar panels, reflective glass and extensive native planting to integrate buildings sensitively into the coastal landscape.
- **50% of the site dedicated to biodiversity**, including wildflower meadows, ponds, pocket forests, wild grass mounds, native hedgerows and pollinator-friendly planting.

SPARKING BOLD IDEAS
ACROSS
FOOD AND DRINK
SUSTAINABILITY
TOURISM
EVENTS AND
HOSPITALITY DESIGN

PROFESSIONAL MEMBERSHIPS

Slow Food International
Euro-Toques Ireland
Institute of Directors of Ireland
International Association of Culinary Professionals
Talamh Beo
Irish Guild of Sommeliers of Ireland
World Food Travel Association
United Nation's SDG2 Advocacy Hub, Chefs' Manifesto
Irish Food Champions Assembly

ANTHONY O'TOOLE

MSc, BA (Hons), Adv Dip, WSET, Irish Food Champion

+353 (0)86 2212217
hello@anthonyotoole.com
anthonyotoole.com

Taoibh Coille
Ballymore
Camolin
Enniscorthy
County Wexford
Ireland Y21 RD60

ANTHONY O'TOOLE

- **Nature-based drainage and water systems**, on-site composting, water-efficient fixtures and landscape-led attenuation to protect local water quality and coastal ecosystems.
- **Sustainable mobility**, including EV charging points, coach access, and safe footpath and cycle connections to the village to reduce car dependency.
- **Diversified year-round visitor markets**, ensuring that business is distributed across seasons and weekdays, reducing peak-period pressure on local roads.
- **Circular economy integration**, with local sourcing from Wexford food producers, craft makers, marine operators, tourism and wellness providers embedded into operations.

Alignment with Tourism Ireland and Fáilte Ireland Sustainability Goals

The resort's sustainability ethos supports the core priorities of:

- Tourism Ireland's Global Marketing Strategy, which prioritises:
  - attracting longer-stay, higher-value international visitors
  - promoting responsible travel and deeper cultural engagement
  - positioning Ireland as a premium, sustainable tourism destination
- Fáilte Ireland's Climate Action Roadmap for Tourism Businesses, which calls for:
  - reduced carbon emissions across the tourism sector
  - sustainable mobility and localised supply chains
  - energy-efficient buildings and integration of renewable technologies
  - protection and enhancement of biodiversity and natural landscapes
  - year-round, dispersed visitation to avoid seasonal environmental pressure

Kilmore Quay Integrated Resort incorporates these principles into both **design and ongoing management**, contributing to Ireland's climate objectives while establishing Wexford as a leader in sustainable coastal tourism.

AOT

SPARKING BOLD IDEAS
ACROSS
FOOD AND DRINK
SUSTAINABILITY
TOURISM
EVENTS AND
HOSPITALITY DESIGN

PROFESSIONAL MEMBERSHIPS

Slow Food International
Euro-Toques Ireland
Institute of Directors of Ireland
International Association of Culinary Professionals
Talamh Beo
Irish Guild of Sommeliers of Ireland
World Food Travel Association
United Nation's SDG2 Advocacy Hub, Chefs' Manifesto
Irish Food Champions Assembly

ANTHONY O'TOOLE

MSc, BA (Hons), Adv Dip,
WSET, Irish Food Champion

+353 (0)86 2212217
hello@anthonyotoole.com
anthonyotoole.com

Taoibh Coille
Ballymore
Camolin
Enniscorthy
County Wexford
Ireland Y21 RD60

ANTHONY
O'TOOLE

Eco-Tourism as an Operating Model

The resort's operating model promotes low-impact, longer-stay visitor behaviour, encouraging guests to engage with the natural and cultural environment responsibly through guided marine activities, coastal walking routes, food experiences, craft workshops, and wellness programmes delivered in partnership with local experts.

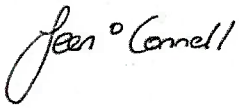
Extensive on-site amenities - including the spa, wellness centre, indoor and outdoor leisure facilities, padel courts, family and children's areas, and dedicated relaxation spaces - ensure that guest activity is well managed and environmentally contained, reducing pressure on local beaches, swimming areas, and village infrastructure. The design has also carefully considered amenities that local residents will use on a daily and weekly basis, strengthening community integration.

Through careful environmental stewardship, native planting, sustainable mobility measures, and responsible day-to-day operations, Kilmore Quay Integrated Resort is positioned to serve as a model for modern coastal eco-tourism - supporting the landscape, the community, and the long-term resilience of Kilmore Quay as a thriving and environmentally sensitive coastal village.

Yours sincerely,



Anthony O'Toole
International Tourism, Hospitality &
Food Culture Specialist



Jean O'Connell
Tourism Strategy, Communications &
Commercial Development Specialist

Traffic and Access Response Report

Kilmore Quay, Co. Wexford

Response to 3rd Party Appeals

Issue P01 – 21 November 2025

Doc Ref.: 4320-MHT-T-RPT-03-P1

Planning Application: 20250962W

Prepared For:

SCA Planning

MEINHARDT

TRAFFIC AND ACCESS RESPONSE REPORT

KILMORE QUAY, CO. WEXFORD

RESPONSE TO 3RD PARTY APPEALS

Quality Assurance Page

Issue	Date	Prepared By	Checked By	Approved By	Remarks
P01	21/11/2025	B.Mitchell			Draft for project / client team review
P02	24/11/2025	B.Mitchell	A.Lacey	B.Mitchell	Final issue for Appeal

Table of Contents

1 Introduction 3
2 Traffic Flow Figures – Clarifying Village Impact 3
3 RSA Findings and Implementation 3
4 Echo Beach Pedestrian/Cycle Link 4
5 Traffic Flow and 10% Rule 4
6 Construction Traffic 4
7 Emergency Services 5
8 Rural Road Network and Safety 5
9 Visitor Driving Behavior and Active Travel 5
10 Parking and Seasonal Congestion 5
11 Compliance with Policy 6
12 Conclusion 6

1 Introduction

This report addresses traffic and access concerns raised in third-party appeals against Wexford County Council's decision to grant permission for the proposed Integrated Tourism Resort Complex. It draws upon the Traffic and Transport Assessment (TTA) prepared by Meinhardt, the Stage 1 Road Safety Audit (RSA) by RoadPlan Consulting, and relevant policy guidance including:

- Transport Infrastructure Ireland (TII) Traffic and Transport Assessment Guidelines (2014)
- Wexford County Development Plan 2022–2028
- Pre-Application and Public Consultation Feedback

2 Traffic Flow Figures – Clarifying Village Impact

Appellants suggest that development traffic will pass through Kilmore Quay village, but this is incorrect.

- Access Design: All vehicular access for the resort is via a new priority junction on the R739, north of the village. There is no through-route via the village core.
- Trip Distribution: The Traffic and Transport Assessment (TTA) show 60% of trips via R739 north and 40% via R739 south, with only 5% of the southern flow destined for the village centre (primarily day trips by residents).
- Active Travel Links: Guests visiting the village are expected to use walking/cycling paths, not drive through the village. The design integrates with WCC's Traffic Management Plan to encourage sustainable access.

In summary, Resort traffic does not route through Kilmore Quay; the network impact is confined to regional roads and junctions outside the village core.

3 RSA Findings and Implementation

The Stage 1 RSA reviewed the proposed access arrangements and internal layout. Key findings relevant to appeals include:

RSA Problem No.	Description	Auditor Recommendation	Applicant Response
2.5	Unclear tie-in between Echo Beach link and existing footpath	Provide adequate connection and facilities to safely enable pedestrians access	Accepted – detailed design and separate consent required
2.2	Risk of pedestrian/cyclist collisions at shared facilities	Provide clear signage and tactile paving	Accepted – will implement
2.8	Vegetation may obscure visibility splays	Relocate or select appropriate planting	Accepted – will implement
2.10	Long straight internal roads may encourage speed	Introduce traffic calming measures	Accepted – will implement

The above demonstrates that the key issues identified in the RSA will be implemented at detailed design of the proposed development.

4 Echo Beach Pedestrian/Cycle Link

Appeal Concern: Safety, legal consent, and design compliance for the proposed link.

Meinhardt Response:

- The Echo Beach link is not relied upon for vehicular access or trip distribution in the TTA
- Its purpose is to enhance active travel options; alternative connections via the R739 footway and Nemestown emergency link remain feasible
- Off-site works will require separate consent and will comply with DMURS and accessibility standards
- Lighting design will incorporate shields and dimming profiles at sensitive interfaces, as recommended in the RSA.

5 Traffic Flow and 10% Rule

One appellant argues that if summer peak traffic is used for modelling, off-season construction traffic could represent a higher percentage increase. Here's why this is not a material issue:

- **10% Rule Explained**: Under TII guidelines, a junction is considered materially impacted if development traffic adds ≥10% to existing flows during peak periods. This threshold triggers detailed modelling, which was done for three junctions (R739/Ard Na Ba, L3056 Ballyteige/Ard Na Ba, and R739/Chapel).

- **Worst-Case Scenario Modelling:** The TTA adopted a robust approach:
  - All external trips assumed by private car (no modal shift).
  - Peak summer occupancy (92%) used for trip generation, representing the highest possible traffic load.
  - Sensitivity tests included WCC's Traffic Management Plan changes (HGV rerouting, tighter junctions).

- **Construction Phase:** Traffic during construction will be significantly lower than operational peak flows and managed under a Construction Traffic Management Plan (CTMP). Even if off-season baseline flows are lower, the absolute construction traffic volume is far below operational demand, so percentage comparisons are not relevant for capacity assessment.
  In summary the 10% rule applies to operational peak conditions, not construction. Using summer peak ensures a conservative, worst-case assessment.

6 Construction Traffic

Appeal Concern: Prolonged construction traffic and safety on rural roads.

Meinhardt Response:

- A detailed Construction Traffic Management Plan (CTMP) will be prepared by the Contractor as a condition of consent.
- CTMP measures will include:
- Defined HGV routes avoiding the village core.
- Restricted delivery times outside network peak hours.
- Road condition monitoring and reinstatement.

- Emergency access protocols.

7 Emergency Services

Appeal Concern: Potential delays for lifeboat volunteers and ambulances.

Meinhardt Response:

- Junction modelling demonstrates minimal delays (RFC < 0.15 at all arms).
- The CTMP will always prioritise emergency access, including temporary traffic management measures during construction.

8 Rural Road Network and Safety

Appeal Concern: Appeals highlight that the R739 and surrounding rural roads are narrow, winding, and not designed for heavy construction traffic or increased visitor volumes.

Meinhardt Response:

- The CTMP will include convoy management for HGVs to minimize conflicts.
- Advance warning signage will be installed at bends and shared spaces.
- Contractor driver induction will cover rural road etiquette and speed compliance.
- RSA recommendations for visibility splays and vegetation clearance will be implemented.

9 Visitor Driving Behavior and Active Travel

Appeal Concern: Concerns were raised about visitor unfamiliarity with rural roads, leading to unsafe driving practices.

Meinhardt Response:

- Wayfinding signage will be provided to guide visitors safely to the resort.
- Traffic speed control, traffic calming and safety measures, including works, in the village are indicated in the Kilmore Quay Village Traffic Management Plan (draft 2024), which has passed through public consultation and which has been taken into account in the design and in the response prepared to deal with appeal traffic issues.
- RSA recommendations for tactile paving and shared space warnings will be implemented to protect pedestrians and cyclists.

10 Parking and Seasonal Congestion

Appeal Concern: Appeals noted existing summer congestion and inadequate parking in Kilmore Quay.

Meinhardt Response:

- Resort parking will be fully self-contained preventing village impact.
- Construction phase parking will be controlled through designated contractor areas and shuttle arrangements if required.

11 Compliance with Policy

The proposed development complies with:

- Objective TM08 of the Wexford County Development Plan, requiring traffic capacity analysis for large tourism projects.
- TII TTA Guidance, ensuring impartial assessment and robust modelling.
- RSA recommendations, which will be implemented through detailed design and enforceable planning conditions.

12 Conclusion

Having reviewed all traffic-related concerns raised in the appeals, the proposed development has been assessed against the highest standards of road safety and transport planning. The Traffic and Transport Assessment (TTA) and Stage 1 Road Safety Audit (RSA) confirm that, subject to implementation of recommended measures, the development will not result in a material adverse impact on the local road network or pedestrian safety.

Key points supporting this conclusion:

- Junction Capacity: All assessed junctions operate within acceptable limits, with RFC values well below 0.85, even under worst-case peak conditions.
- Construction Phase Management: A Construction Traffic Management Plan (CTMP) will be secured by condition, incorporating:
    - Defined HGV routes avoiding the village core.
    - Restricted delivery times outside peak hours.
    - Road condition monitoring and reinstatement.
    - Emergency access protocols prioritizing lifeboat and ambulance services.
- Rural Road Safety: Measures will address narrow carriageways and visitor unfamiliarity, including advance warning signage, speed management, and contractor driver induction.
- Active Travel Integration: RSA recommendations for tactile paving, shared space warnings, and lighting controls will be implemented to ensure safe pedestrian and cyclist movement.
- Parking and Seasonal Congestion: Resort parking will be self-contained, with contractor parking controls during construction to prevent village impact.
- Emergency Access Assurance: Protocols within the CTMP will guarantee unimpeded access for emergency services throughout construction and operation.

In summary, the proposed development complies with TII Traffic and Transport Assessment Guidelines, DMURS, and relevant objectives of the Wexford County Development Plan. With enforceable conditions and RSA-driven design refinements, the scheme will maintain road safety, protect vulnerable users, and ensure the efficient operation of the local network.

MEINHARDT

The Greenway
Block C Ardilaun Court
St. Stephens Green
Dublin 2

Daniel O'Connor

From: Paula <Paula@scaplanning.ie>
Sent: Monday 1 December 2025 14:02
To: Appeals2
Subject: Response to Appeal Ref. 500109
Attachments: Response to Appeal Ref 500109 Brendan O'Flaherty.pdf

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

To whom it may concern,
Please see a response to the 3rd party appeal made by Brendan O'Flaherty under Ref. 500109 attached.

I would be grateful if you would confirm receipt of the attached.

Regards,
Paula Shannon

SCA Planning
Unit 217 Glencullen House
Kylemore Road
Dublin 10

Office: 01-4569084
Mobile: 0877865473

SCA PLANNING & DEVELOPMENT CONSULTANTS

The Secretary,
An Coimisiún Pleanála
64 Marlborough St
Dublin 1

1st December 2025

Re: Tourism Destination Resort Complex at Beak and Nemestown, Kilmore Quay, Co. Wexford.
Your Ref: ACP-Pl 500109
Wexford County Council Ref: 20250962W

Dear Secretary,

I refer to your letter dated 6th November 2025 enclosing grounds of appeal submitted by 17 no. appellants against the decision by Wexford County Council to grant permission for the above referenced development subject to conditions. This submission has been prepared in response to the appeal submitted by Brendan O'Flaherty, Four Winds, Kilmore Quay, Co. Wexford, with extensive grounds composed by Paula Redmond on his behalf, which require a detailed response.

A response has already been submitted to ACP in respect of the appeal submitted by Catriona and Will O'Flaherty. Therefore, it is intended to respond to those remaining grounds of appeal in a separate submission.

This response has been prepared in conjunction with SCA Architects, DNV Environmental Consultants, DHLA Landscape Architects and DRA Consulting Engineers.

Unit 217 Glencullen House,
Kylemore Road,
Dublin 10
Ireland
D10 TK30

Simon Clear B.A. Dip. T.P. MIPI
Darran Quaile B.A. MRUP MSc BLUP MIPI
Paula Shannon B.A. MRUP MIPI

Phone: 00-353-1-456 9084
E-mail: admin@scaplanning.ie
Website: www.scaplanning.ie
VAT Number: 4092398PH

In the interest of brevity, the same items are not repeated in each appeal response, and it is therefore requested that all 3 responses to the 3rd party appeals are taken into consideration in the assessment and determination in respect of the proposed project.

Introduction

Unfortunately, the agent Paula Redmond uses assertive language as though everything stated is an irrefutable confirmation of fact, whereas that is not the case. It is normal to respectfully submit opinions in grounds of appeal. In this response we challenge on all fronts the 'assertions' made by the appellant's agent as being findings of fact or being authoritative. It is our submission that it is for ACP to carry out its own assessments and determinations as provided for under the legislation.

DAU Observation

The agent has included a submission to Wexford County Council from the Development Applications Unit of the Department of Housing, Local Government & Heritage (DHLGH). The DAU is a section within the DHLGH alongside the National Parks and Wildlife Service (NPWS) and the DAU simply has an observatory role in relation to planning applications and other planning related issues. The NPWS is a technical service of the DHLGH and is the Government agency with overall responsibility for managing Natura 2000 sites in Ireland.

The DAU role is neither as a decision maker, nor is it a competent authority in the context of AA, NIS and EIAR Assessments. The DAU submission to Wexford County Council concluded with a double negative, which appeared to endeavour to suggest a role in decision making. The competent authorities in the subject case are, in the first instance, Wexford County Council, and now, on appeal, ACP.

Therefore, the opinions expressed in the DAU observations on the application are simply observations and are not findings. As these observations have been presented to ACP as authoritative by the appellant's agent it is necessary to address the issues raised in responding to the grounds of appeal.

DNV Response to DAU

DNV as AA, NIS and EIAR managers have collaborated with relevant specialists to conduct and present the relevant studies and assessments to inform in respect of potential risks to the environment, biodiversity and ecology, taking all Eu Directives and legal requirements into account, including Article 6(3) of Habitats Directive.

The DAU submission to WCC alleged discrepancies in the conservation status of QI/SCI species listed in Table 7 of the NIS. The conservation status listed is taken from the most recently updated official document for the relevant European sites, in this case their Standard Data Forms (SDF) (available on the European Environment Agency website). For instance, the Ballyteige Burrow SPA SDF has been updated in 2021, while the national status referenced in the appeal is from the older, 2017 report. Hence, it is shown that data used is the most up to date as required for an NIS. It is submitted that the DAU should rely on the most up-to-date EU data.

Operational Phase recreational impacts are assessed as negative and permanent, however not significant given the typically lower use of shore areas for recreational activities during the winter months when the Ballyteige Burrow SPA hosts important populations of wintering birds. Tourists are not anticipated to significantly increase winter use of this area, and hence significant disturbance to wintering birds is not anticipated.

Given the above, the thorough assessment carried out in the NIS using the most up to date baseline data, and the full suite of mitigation measures put forward to limit and avoid significant impacts that could adversely affect the integrity of European sites, the NIS preparation is considered to be fully compliant with the Article 6(3) of Habitats Directive.

Preparation and Adequacy of EIAR

The EIA screening did not fail to meet scientific standards under EU Dir. 2011/92, as amended by 2014/52/EU. The screening did not rule out preparation of an EIAR, which was mandatory in any event and which was prepared and submitted to Wexford County Council with the planning application documentation, as required.

The EIA assessment was properly carried out by Wexford County Council and now falls to be conducted by ACP as the competent authority.

CEMP

The preliminary CEMP was adequately prepared to address construction stage impacts, including mitigation by monitoring as indicated above.

The appellant's agent 'asserts' that insufficient detail is given in mitigation measures in relation to reducing disturbance impacts on birds utilising the adjacent areas during the construction phase. This was addressed in the application documentation, by the first mitigation measure; to contract an Ecological Clerk of Works (ECoW) to ensure these measures are effective, and engaging an ornithologist if considered necessary to confirm no significant disturbance occurs.

Construction Period

In relation to the construction stage Environmental Protection barrier, it should be noted that the nearest building to be constructed would be in excess of 100 metres from the shoreline. Therefore, the construction barrier will be located at the construction site and not on the shoreline and the most appropriate construction barrier can be selected at the construction stage and will not be located in, upon or interfering with any species identified for protection in the Ballyteige SPA.

The appellant's agent has no relevant qualification or ability to 'assert' that a construction period of 2-years at a distance of >100m. from the shoreline would have any disturbing effect upon birds associated with the Ballyteigue Burrow SPA, which is located, at the nearest point, 670m to the west, extending a further 9 kilometres to the west with an area of 271ha.

Intervening between the subject site at Nemestown and Beak are: -

- Kilmore Quay village, commercial fishing harbour and marina, extensive laydown areas; car parks and new promenade with tall floodlighting and public lighting columns;
- Sofimar processing plant and other industrial buildings located west of the village and adjacent to Ballyteigue Burrow;
- Other tourist infrastructure and activities occurring in and around the village;

- All without apparent significant impact on the Burrow by reason of activity, noise, light, HGV traffic from any of these.



Figure 1 All of Kilmore Quay exists between the subject site and Ballyteige SPA. Hotel shown in the background in this photomontage. Source: Digital Dimensions

An Taisce Observation

The grounds of appeal reference the submission made to Wexford County Council by An Taisce, which in fact was a constructive submission and which the applicants are willing to follow in the delivery of the project, subject to a decision to grant permission by ACP.

Water Supply and Wastewater

By legislation, use of Uisce Eireann (UE) assets are matters that are dealt with under the relevant legislation underpinning the operations of UE. There is a requirement for Uisce Eireann to agree preliminary requirements for servicing under pre-application confirmation of feasibility procedures.

The Sustainable approach to water supply and foul water drainage for the entire development is fully described in these responses by DRA consulting engineers and by DNV, as follows: -

Groundwater Supplies

As documented in the Civil Engineering Planning Report (DRA, 2025 submitted with the planning application), water supply for the Proposed Development will be from an onsite supply served by 2 no. proposed groundwater wells with a supplementary back-up mains supply from UE. This supplementary supply will feed into a drop tank to prevent backflow into the mains water system as agreed with UE (24-hour water storage will be provided on site).

The UE confirmation of feasibility in respect of water supply indicates that a 1.6km upgrade of water supply network infrastructure would be required to support the development which would be funded by the developer. This upgraded supply would also augment the overall supply into the Kilmore Quay settlement area.

The use of a groundwater supply will reduce the demand for treated water from the UE supply and will therefore improve the supply available to others in Kilmore Quay. This is a sustainable approach. It should be understood that there are 2 No. existing agricultural wells on the lands and the drawdown indicated is not totally new demand on the aquifer.

As detailed in the Hydrogeological Assessment Report (DNV, 2025a; Volume 3: Appendix 7.1 of the EIAR), there are no GSI-registered groundwater wells or source protection areas (SPAs) within a 2 km radius of the site. However, the report identifies an existing groundwater supply well (PW1) adjacent to derelict buildings on the site, which is not listed in the GSI database. A water retention pond located at the southeastern boundary was also noted during the site walkover. According to the farmer currently renting the lands for carrot cultivation, PW1 is used to fill this pond as a backup irrigation source during dry periods.

The GSI has calculated an Effective Rainfall (ER) value of 367.8mm/year for the site. The GSI mapping has mapped an area of the site as having a low effective recharge of 27.58mm/yr (based on a recharge coefficient of 8% ER) and another area as having a higher recharge rate of 312.59mm/yr (based on a recharge coefficient of 85% ER), which corresponds with a more permeable area (i.e. sand and gravels).

Site investigations confirm the presence of sand and gravel layers hydraulically connected to bedrock in some newly installed wells, potentially contributing to the bedrock aquifer. Therefore, the higher recharge rate (312.59 mm/year) was adopted for this assessment as it reflects actual site conditions.

DNV's own calculation, based on recent Met Éireann data, estimates ER at 346.74 mm/year. Applying an 85% recharge coefficient yields 294.73 mm/year, which is broadly consistent with the GSI-derived value. The minor variation between these values is expected due to differences in data sources and mapping resolution and does not indicate any methodological error. Importantly, the adopted recharge rate is firmly grounded in observed site conditions and represents a realistic estimate of groundwater replenishment potential. Using this value ensures that the assessment accurately characterises the availability of groundwater supply without overstating resource capacity, thereby supporting a conservative and robust evaluation of potential impacts.

The adopted recharge rate is based on GSI mapping, which incorporates long-term hydrological data and reflects current climatic conditions. This approach is consistent with industry best practice for baseline hydrogeological assessments. While future climate variability may occur, such projections are highly uncertain at the local scale and are not typically applied in groundwater resource evaluations. Accordingly, the value used remains robust and representative of existing site conditions, ensuring a defensible assessment of groundwater availability and sustainability.

Based on the results of the hydrogeological assessment (DNV, 2025a; included in Volume 3: Appendix 7.1 of the EIAR submitted with the planning application) it was concluded that the required groundwater supply for the Proposed Development of approximately 241 m^3/day (approximately 10 m^3/hour) could be sustainably derived from the underlying bedrock aquifer according to the assessment of the data gathered during the 72-hour pumping tests at the existing onsite supply well (PW1) which maintained an average discharge rate of 9.7 m^3/hour under near steady-state conditions achieved after 7 hours of pumping, with an induced drawdown of 9.71 m and no noticeable drawdown observed at the three (3 No.) observation wells. Furthermore, the onsite supply well (PW1) demonstrated strong recovery characteristics,

achieving 90% recovery within 29 hours and full recovery within 72 hours after pumping ceased.

The results of water quality sampling at the existing supply well (PW1), both at baseline and during pumping, showed no evidence of saline intrusion, providing strong assurance of current groundwater conditions. While this confirms the absence of saline ingress during testing, it is not possible to predict the absence of saline intrusion over several decades of operation because there is no historical abstraction data or long-term monitoring record for the site. The current assessment is therefore based on industry best practice and observed site conditions. Furthermore, the lack of measurable drawdown in the three observation wells during testing supports the conclusion that the proposed abstraction will not induce saline intrusion under current site conditions.

The three observation wells installed for the pumping test are considered sufficient to confidently characterise the heterogeneous groundwater flow regime across the site and surrounding lands. Their strategic placement allowed monitoring of hydraulic responses in different geological units, ensuring that variations in permeability and connectivity were captured during the test. This coverage provides confidence that the assessment reflects both on-site and off-site conditions within the calculated Zone of Contribution (ZOC) and outer source protection zone for PW1, which is approximately 42.21ha based on the required groundwater supply of 10 m^3/hour plus 50% contingency (as per the Groundwater Protection Schemes guidelines, DoEHLG/EPA/GSI, 1999). Furthermore, the absence of measurable drawdown in these observation wells during pumping strongly supports the conclusion that the proposed abstraction will not induce significant changes in groundwater levels or create conditions that could lead to saline intrusion under current site conditions. This monitoring approach aligns with industry best practice and provides a robust basis for assessing potential impacts both within the site and across the surrounding land.

Taking account of the maximum supply requirement of 10 m^3/hour, the demonstrated sustainable yield and recovery performance of onsite well PW1, and the absence of any noticeable drawdown at the three (3No.) observation wells during the 72-hour pumping test, it is considered that the proposed abstraction will have a negligible effect on other groundwater supplies or the overall bedrock aquifer resource.

It is standard practice to identify recorded and registered wells, not unregistered. As the nearest known supply wells are located more than 2 km from the site, there is no anticipated overlap of ZOC, and the risk of interference with existing well water sources is therefore considered negligible.

In summary, the proposed development will be served by a sustainable on-site supply, supplemented only by UE in accordance with statutory consents. Extensive engagement was undertaken with UE, and the Uisce Éireann Confirmation of Feasibility nominates that a 1.6km upgrade of the water network would be required to support the development and the cost of these works would be funded by the developer. This upgrade will improve water supply and pressure to Kilmore Village generally in addition to supporting the proposed development in times of reduced groundwater supply and is a clear community benefit.

The grounds of appeal that suggest groundwater testing should have occurred during the dry summer season overlook the fact that the development can be supplemented by, or indeed be fully sustained, from the upgraded UE supply during dry spells and as required throughout operation. However, the on-site supply system is designed to minimise reliance on treated UE water resources.

Uisce Eireann Water Supply

The UE confirmation of feasibility in respect of water supply indicates that a 1.6km upgrade of water supply network infrastructure would be required to support the development and the overall Kilmore Quay settlement area. This requirement is not 'project splitting' as alleged. The allegation of 'project splitting' in respect of mains water supply infrastructure has been dealt with by DNV and the allegation is denied.

The development is substantially supplied by groundwater, which is described in Civil Engineering Report and EIAR Report as described above. The UE water supply upgrade, which is to be funded by the developer will improve the water supply and pressure in the general Kilmore Quay area in addition to supplementing the proposed development supply, if and when required.

A standard, appropriate condition is requested relating to UE water supply and foul water drainage arrangements.

Note, hosepipe bans in Ireland in 2025 applied to the entire country, not just to Kilmore Quay. The Government has announced, 6th November 2025, an extra €200 million to be made available to UE to bolster domestic supplies and servicing for residential development. Kilmore Quay is ahead of the loop, having had the WWTP plant upgraded in recent years and a developer undertaking to enhance water supply to the benefit of the entire village.

Foundations potentially affecting groundwater flows

As detailed in the Hydrogeological Assessment Report (DNV, 2025a; Volume 3: Appendix 7.1 of the EIAR), downgradient groundwater levels at: -

- Monitoring location BH01 in the southwest of the site ranged from 8.2mbGL (or 4.66mOD) (8th October 2025) to 8.78mbGL (or 4.08mOD) (16th October 2025);
- Monitoring location BH02 in the south of the site ranged from 2.7mbGL (or 4.77mOD) (8th October 2025) to 2.86mbGL (or 4.61mOD) (7th October 2025).

Upgradient groundwater levels at: -

- Monitoring location BH03 in the north of the site ranged from 5.1mbGL (or 6.51mOD) (8th October 2025) to 5.31mbGL (or 6.38mOD) (16th October 2025).

The map below shows the location of boreholes referred to above. Note that monitoring borehole No.2 is approximately at the location of the proposed hotel building.



Figure 2 Extract from the Hydrogeological Assessment Report - Location of Boreholes. Source: DNV

Therefore, the majority of building foundations are expected to be above the groundwater table.

Where foundations or drainage infrastructure have the potential to impede local groundwater flow, standard design and construction measures will be implemented, including the incorporation of groundwater drainage around impermeable subsurface structures. These measures ensure that any alteration to localised groundwater flow paths within the groundwater body will be extremely limited and confined to the immediate vicinity of the structures.

There will be no overall change to regional groundwater flow paths within the aquifer. This conclusion is supported by the site's proximity to the coast and the dominant natural hydraulic gradient toward the sea, which governs regional flow direction. Any potential localised changes caused by foundations or subsurface structures will remain negligible and will not influence the broader groundwater regime. The strong coastal gradient, combined with the absence of significant drawdown during pumping tests, further confirms that regional flow patterns will remain unaffected.

Based on the investigations undertaken on site, it is assumed the hotel and aparthotel will be supported on piles and ground-beam footings. It was assumed the piles were 10m deep on average for the hotel and aparthotel, to bedrock level.

All other structures would be supported on conventional strip and pad foundations. Typical conventional strip and pad foundations (footings) for lodges will be 900mm below ground level.

Buffer Zone

ACP should note that the buffer zone referred to by the appellant's agent, which appears to be understood to be a bird protection buffer zone by that agent, is in fact a general coastal buffer identified in the Wexford County Development Plan as the required set back of buildings to future-proof against future sea level rise and climate change. Note the WCDP was properly prepared with SEA, SFFRA and scrutiny by the OPR and the buffer was adequately defined in that context.

The buffer is not an exclusion zone for people and while Wexford County Council correctly identified desire lines for walkers and support for the Wexford long distance pathways, there is no policy in this area to be found in statutory development plans, or statements in relation to SAC/SPA that excludes all persons from any areas.

The DAU author is also incorrect to suggest that there should be a 'creeping buffer' and that a buffer of 200 metres should be established. There is no suggestion of that type indicated as being considered necessary anywhere within the Wexford County Development Plan. The WCDP was prepared by a coastal planning authority in full knowledge of inundation risk and set the buffer accordingly.

It is not for DAU to suggest or to seek to create statutory development plan policy. That is a matter for the coastal planning authority to decide. It is noted that, overall, the DAU observation transmitted to WCC did not contain any proper reference to the National, Regional, WCDP policies and objectives and was significantly inadequate in this regard. The submission appeared to have an entirely negative intent.

Nemestown Footpath

There are policies, objectives and initiatives in the WCDP and other plans supporting long-distance walking and cycling, tourism and active-travel routes. Wexford County Council indicated a wish to support such facilities and the applicant design team incorporated a pathway to accommodate known active-travel and long-distance tourism measures identified by WCC.

Anticipating the type of negative response indicated in the grounds of appeal and, by reference to the DHLA landscape master plan, it should be noted that the gravel-based, minimal intervention, footpath is tucked as close as possible to the landscaping south of the core structures of the hotel resort project.

The route is provided for community use and connectivity in the long-distance walking routes being established by Wexford County Council and in accordance with the WCDP and the DEDP (2025).

It should be noted that non-invasive pathways and trackways have been developed by NPWS/OPW throughout mountain and bogland areas, which are also SAC/SPA. An environmentally sensitive method of footpath delivery has been devised, which is consistent with methodology used elsewhere in similar circumstances.

Collision Risk

The landscape masterplan indicates the finished land profile is raised in mounds to reflect the dunes landscape of the Ballyteige Burrow. The ground will be made-up in front of the southerly elevation of the buildings and the green roofs at lower levels will be angled down to effectively meet the mounds when viewed from the south. The core of the building is south facing and will, of necessity, be fitted with tinted glazing, brises-soleil, and/or internal blinds to control overheating and light penetration affecting internal screen presentations, in any event and to comply with Building Regulations.

The elevation height above green roofs, as shown below, is - Dimension A: 12180mm and Dimension B: 14900mm. The combination of landscaping, green roofs, tinting of glazing, brises soleil and features to prevent excess solar heat gain, will mean that the buildings are not see through and are therefore not a significant risk for bird strike.

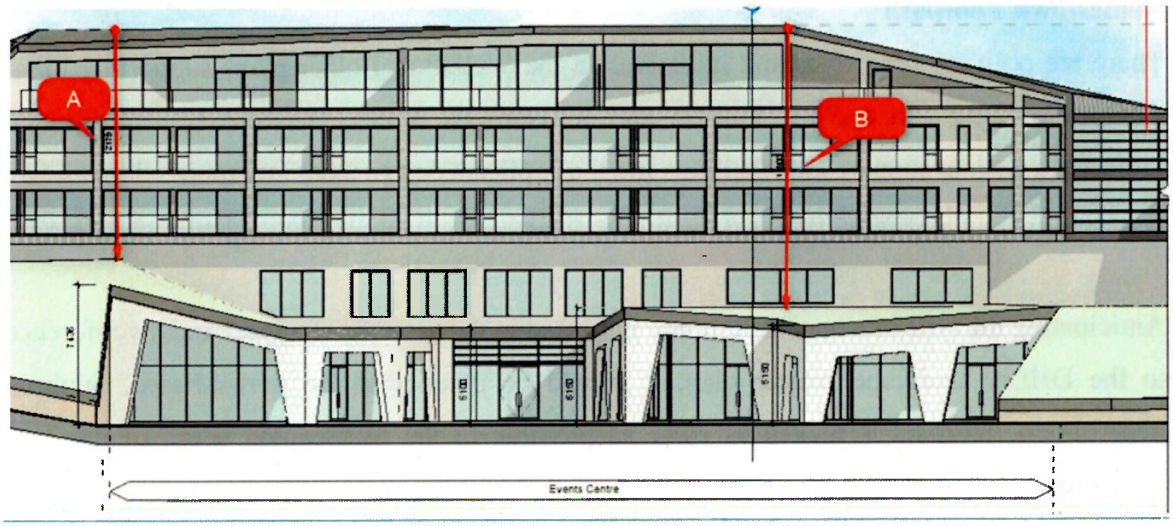


Figure 3 South Elevation with Dimension A and B Identified. Source: SCA Architects

Bird and Bat Friendly Lighting

As indicated in the useful An Taisce submission, there are well recognised methods of reducing the risk of bird strike and for lighting spaces within developments using well-recognised bird and bat friendly measures.

Visual Impact

It should be noted that there are no particular public realm viewpoints from the south. The Nemestown beach is located below the beachside bank by approximately 2m., at above head height of persons on the beach.

Persons using the walkway in the buffer zone would get a view of the southern elevation. These will be guests or long-distance walkers on the move observing a changing perspective to the building. SCA architects have described the architectural composition as follows: -

The proposed design of the hotel building responds sensitively to the site's unique characteristics and evolving context, resulting in a refined and well-integrated development. The site layout positions domestic-scale buildings along the periphery, with the larger hotel building located centrally within the southern, lower landform, portion of the site, ensuring an appropriate transition in scale.

The massing of the hotel has been deliberately broken down through its architecturally articulated form - varied rooflines, strategic voids, and fenestration strategy, supported by a carefully selected palette of external materials. The design concept elevates the central portion of the hotel to create a focal point and introduce variety to the resort's silhouette, an approach that echoes the role of St. Patrick's Church and Ballyteigue Castle within the village skyline. Views towards the hotel from the sea have also been addressed to ensure a positive contribution to the coastal setting.

This balance between solidity and openness allows the building to meaningfully engage with its surroundings, drawing from traditional vernacular forms of Kilmore Quay while incorporating a contemporary architectural expression. These measures collectively soften the overall massing and avoid any monolithic appearance.

The roof form wraps and morphs over the building, reducing in height at the ends and gently sloping towards the ground. This approach further diminishes perceived mass, grounds the building into the landscape, and reflects the natural rise and fall of the forms found throughout the area.

The design evolution of the hotel has strengthened its ability to meet modern hospitality requirements while simultaneously celebrating and reinforcing the established character of Kilmore Quay.

By way of further explanation in response to statements in several grounds of appeal, the gradient of the existing site rises from the R739 road level of 10.5m up to 12.0m in the centre of the site and then gradually falls soutwards to 4.5m above the beach level at the south east corner. The hotel is located at the lowest natural height, with the surface level below the level of Kilmore Quay village, which is constructed on a solid landform perched above the Nemestown shoreline.

In architectural terms the extensive site of 20.3ha has capacity to accommodate and integrate a destination resort development with low site coverage and without overwhelming/overbearing the neighbouring heritage village centre or neighbouring residential properties.

Adequacy of Photomontages

The agent's assertions relating to the lack of photographs from the rear of houses demonstrates a lack of understanding as to the purpose of Photomontages as an aid to assessing proposed developments. The primary purpose is to identify the visual impact from the public realm, not from individual houses or back gardens. Photographers are not allowed to enter private property without consent.

Photomontage 5 (photo taken from the road outside the Garda Station) shows the scale of development here, through a gap between the Garda Station and the recently extended (2-storey rear extension) house on the right. That house is immediately adjoining Brendan O'Flaherty's house, which is next to the right. The photomontage shows a second house on this property and 2-storey lodges in the rear view, with the hotel family suites accommodation wing in the rear background.



Figure 4 Brendan O'Flaherty's House is next to the extended house on the right.

Source: Digital Dimensions

View from the Irish Sea

The nearest viewpoint from the sea is from the waymarked navigation channel approximately 500 metres offshore so, the viewing distance from the sea to the hotel frontage is c.600m. This is due to the presence of the Saint Patrick's Bridge geological structure and the identified navigation route across that structure.

The Photomontage viewpoint from the sea provided in the application represents the nearest point to the shore that is navigable and from which to avail of a view north towards the southern elevation of the proposed development. Photomontage 11 submitted with the application shows the hotel development viewed from the navigation channel, demonstrating that the hotel is not greater in scale that Kilmore Quay village, which is visible on the left side of the photo.



Figure 5 Closest view available from the navigation channel in the sea, showing the proposed development from the marine. This is the only marked navigable channel available and therefore, representing the potential view from the public domain, that is traversed by tourist boats to the Saltees and by commercial and recreational craft. The development will not be highly conspicuous from the sea. Source: Digital Dimensions.

Coastal Erosion Comments

In respect of coastal erosion allegations, the Wexford County Council coastal engineer's indication of medium confidence in relation to the likelihood of loss of ground here due to inundation is represented by the agent as a finding of a pessimistic outlook. However, that is not the correct interpretation of the expert engineer's statements in respect of the proposed development. Medium confidence is a level of confidence. In respect of the preparation of EIAR, there is a range of descriptions of risk ranging from significantly positive to profoundly

negative. An assessment rating of medium confidence is on the positive side of the range, not on the negative side as interpreted by the agent.

The WCC Coastal Engineer's report noted a number of local features at the particular location that contributed to confidence and permission was recommended by the engineer.

Particular features are evident in this location that indicate good reasons for confidence, including: -

- The geological make up of the St. Patricks Bridge (glacial moraine);
- The geology of the Saltee Islands;
- The hard rock on which Kilmore Quay village is founded protecting the harbour and Nemestown beach, which are sheltered below the village from prevailing weather impacts from the south west.
- The Kilmore Quay harbour and marina enclosures and harbour lay-down areas adjacent to the harbour;
- The recently constructed car parks and promenade;
- The Forlorn Point geological feature to the southwest, protecting Kilmore Quay from prevailing weather direction.
- Exposed metamorphic rock extending from the shoreline;
- St Patrick's Bridge composed of insoluble, glacier transported rocks.

Therefore, the 'assertion' that goes with this negative interpretation by the appellant's agent is not an assertion of fact and should be dismissed.

Ecological Enhancement Area

Green field run-off from the site which does not go to ground via infiltration, currently discharges to an open channel leading to the southeast corner of the site, which is naturally the lowest part of the site.

Nature based Sustainable Urban Drainage Systems (SuDS) have been provided throughout the development site to manage stormwater run-off, including measures which provide both ecological and hydrological benefits. SuDS are designed to maximise the detention and cleansing opportunities and benefits that can be secured from surface water management to

mimic the existing green field run-off (volume) regime. The proposed SuDS design incorporates a number of soft-drainage measures, to slow-down, filter and cleanse surface water discharge, ensuring it is clean water when it eventually leaves the site.

A detailed assessment of stormwater discharge water quality has been undertaken in accordance with the Ciria SuDS Manual 2015 to demonstrate that the proposed SuDS measures adequately mitigate against all pollution hazards. This is outlined in detail in the DRA Consulting Engineers Civil Engineering Report (2025).

Any runoff from the open channel to the east of the site will be filtered and cleansed through the SuDs features, including swales, surface detention ponds and selected appropriate planting. The intention in the southeast corner is to create a natural wetland habitat beneficial to wildfowl and animals, as part of the overall sustainable, natural drainage design.

The detention ponds are designed with gentle slopes and are located in an area of the site which will not be interfered with by human access through landscaping measures and information. The SuDs features offer ecological enhancement for wildfowl, fauna and flora and have been interactively designed between the ecologists, DNV – ref. Wetland Creation, Enhancement 1, EIAR Chapter 16, landscape architect, DHLA and the civil engineers, DRA consulting engineers.

Overlooking and Loss of Privacy



Figure 6 Extract from DHLA Landscape Masterplan Illustrating Relationship to Appellant's Property

The annotated landscape plan extract above shows what is included in the proposed development in relation to the appellants house (based on the site location identified by the appellant's agent). The annotated layout indicates that what is closest to the appellant's boundary is an internal access road and car parking bays (09). The lodges are designed to be 2-storey, domestic in scale and style, providing accommodation for visitors to the resort (07) and operated under single management. The family suites (24) are 3-storey in scale, showing the transition across this part of the site.

The Pavillion Restaurant is 199m from the appellants house at the nearest point. The west end of the hotel sloped roof is 234m. The nearest domestic-scale lodge is 132m.

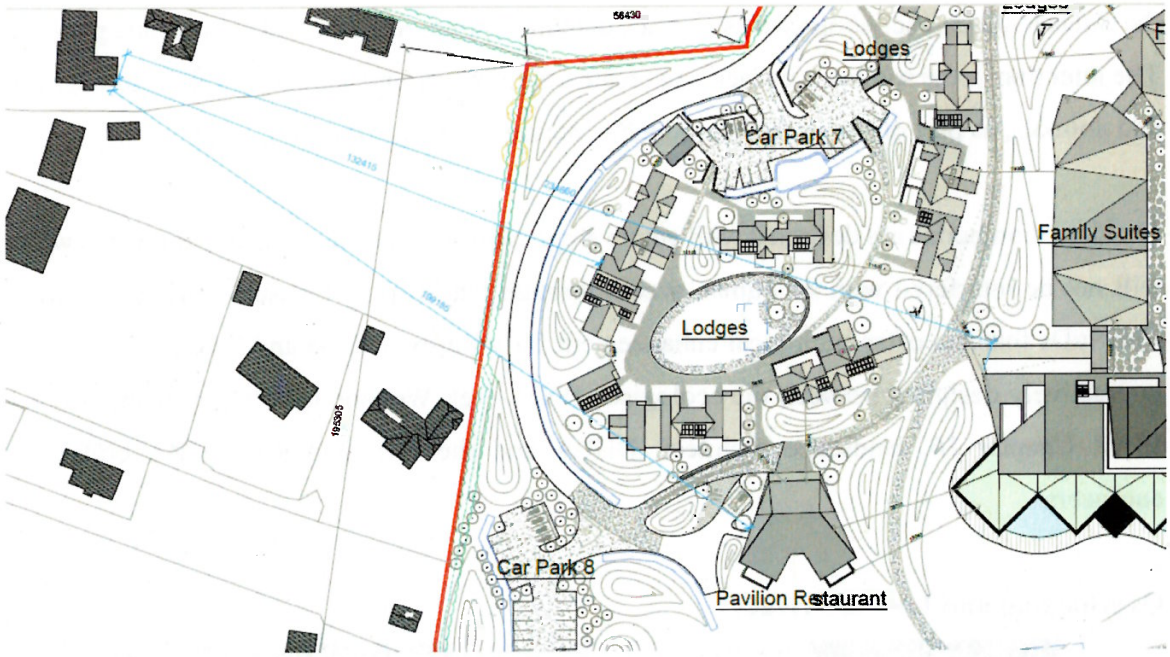


Figure 7 Extract from Site Layout Plan with Distances Shown. Source: SCA Architects

The datum proposed ground floor level of the hotel building is +9.5m OD (over datum). The appellant's house ground floor level is approximately +15.80mOD (estimated by SCA architects from the OS map road level information available). Therefore, the ground floor level of the appellant's house would be approx. 6.3m above the ground floor level of the hotel building.

The development has no overshadowing or overlooking impact on the appellant's dwelling or significant visual impact on the appellant's dwelling. The distances are very considerable in the context of alleged injurious overlooking.

Archaeology

The DAU submission on archaeological fieldwork is noted. However, this is unnecessarily disruptive to existing landuse to carry out fieldwork before a grant of permission that can include a condition(s) regarding pre-commencement archaeological licensing and resolution should the development progress through the planning procurement stage and for archaeological monitoring of works, should the development progress to construction.

Geology

There is no indication from the agent as to what, if any, interaction there is between the development on land and the St Patrick's Bridge geological feature (glacial moraine feature) extending 4km out to sea. The observations relating to St. Patrick's Bridge have no relevance to the proposed development.

Community Infrastructure

In terms of 'assertions' of lack of community infrastructure in Kilmore Quay, ACP should take note of the very considerable support that was expressed by members of the Kilmore Quay business community and others providing tourist business services in submissions to Wexford County Council.

Kilmore Quay is identified for regeneration through, inter alia, tourism development in the WCDP. It is identified for economic and employment growth through tourism in the DEDP 2025.

Tourism development that reduces or eliminates seasonality and supports viability of businesses, employment and services in Kilmore Quay supports the community.

Master plan

'Master plan' is one of the most misused and abused words in the entire realm of planning. It is possible to draw up a masterplan on the back of an envelope or on a beer mat and call it a

master plan. The master plan called for by Wexford County Council was to indicate connectivity. The master plan did not propose any zonings and did not purport to have any statutory effect and it would therefore, not be appropriate to conduct SEA in relation to any aspect of the indication of integration and interconnectivity indicated in the outline included in the otherwise comprehensive architects design statement prepared by SCA architects.

Landowner Consent

In respect of landowner consent it can be noted that the proposed development does not incorporate proposals for any development on any land that is not owned by the applicant or consented to. It should be clearly understood that, as per plans and particulars submitted with the application, which included 1 private landowner consent, no path exits the subject site onto any private land without consent.

Car Dependency

The general thrust of the All-Island tourism programme in coastal areas is, of its nature, mostly car dependent based (including e-modes) on touring the Wild Atlantic Way and Ireland's Ancient East tourism development programmes developed by Failte Ireland. Active travel modes are developing rapidly - walking, cycling, e-bikes etc, long distance greenways and blueways. The proposed development facilitates and encourages these active modes and reflects Wexford County Council's wishes in this regard. This is also reflected in Northern Ireland through the Down/Antrim Coast touring routes and other initiatives there.

The Wexford DEDP deals with utilising the Rosslare Ferryport as the prime point of access for Wexford Coastal Tourism.

It is generally acknowledged that ferry/train-based tourism travel is preferable to aircraft travel on environmental grounds. Keeping Domestic tourism on the island, by providing better resort infrastructure, is also preferable to families heading offshore to find resorts.

Bus public transport (schedules Appended to the grounds of appeal) doesn't generally serve the needs of family groups heading off for holidays, or those wishing to use bikes on holiday. However, there are all-year Wexford Coast bus tours advertised. So, having arrived, families can avail of day bus tour services, which already exist and which can be added into the

operational agenda for guests – demonstrating another example of the positive spin-off for local tourism service providers.

A detailed explanation of the traffic assessments and Audit responsive design is provided in the response to the other 16 appeals and is not repeated here. The allegation that insufficient reports were prepared for the application stage is false.

Appendices Attached to the Grounds of Appeal

The appendices citing examples of coastal erosion are of no use to the appellant's case. The examples given are not in this locality and it is specifically stated in one example that 'our shoreline is not rocky, it is soft'. Erosion affects soft shoreline, which occurs at locations east of St Patrick's Bridge. Those conditions don't apply at Kilmore Quay and Nemestown, as explained above and also explained in published pamphlets, including those included in appendices by the appellant's agent.

In relation to suggestions as to potential impacts upon SAC/SPA during the operational phase the agent has submitted some pamphlets prepared by a well-known local naturalist in conjunction with the NPWS, which manages the designated sites. The pamphlets indicate management of the Nemestown Beach/shoreline is carried out by NPWS and that Ballyteigue Burrow is owned by the Government of Ireland and managed on its behalf by the Office of Public Works (OPW). None of the pamphlets indicate that visitors to the Wexford shoreline in this vicinity should avoid or are banned from accessing these public locations. As shown below, in the image extracted from the South Wexford Coast webpage, guided walks already occur in these designated areas.



Nature walk with Jim Hurley on the shore at Nemestown with St Patrick's Bridge and the Saltee Islands in the background.

Figure 8 Photo from Nature Walk on the shore at Nemestown. Source: South Wexford Coast Webpage

Summary

The proposed development is consistent with strategic and statutory plans prepared at all levels – NPF, RSES, WCDP, WDEDP.

The proposed development does not pose any realistic threat to any SAC/SPA. The nearby SPA/SAC are managed by NPWS and OPW. These bodies encourage responsible access to these coastal areas and have no bans in place.

The information contained in this response indicates that the build-up of landscape and the FFL of the hotel, the main building facing the shoreline would be very robust against coastal erosion, which in any case, does not occur as this is not an area of soft-coastline.

The appellant's agent has no particular qualification or expertise to use the word 'assert' in her submissions on any of the topics, regarding birds, bats, flora, fauna, whereas the persons conducting surveys and preparing reports for the application and the responses to the appeal do and their qualifications and experiences have been declared.

The appellant's agent is incorrect in 'assertions' of inaccuracy about the WCC Planner's report, or the assessment of the planning application by Wexford County Council leading to a decision to grant permission.

The agent's commentary and assertions on visual impact assessment, overlooking, overshadowing and loss of privacy are entirely inaccurate.

Conclusion

Although lengthy, there is no substance in these grounds of appeal, which contain groundless assertions that are not based on fact.

Request for Permission

Taking the above into account, it is requested that permission be granted with 10-year duration and with the attachment of appropriate conditions.

Yours sincerely,

Simon Clear.