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 **13/01/2026** from **Will & Catriona O'Flaherty** I recommend that section 131 of the Planning and Development Act, 2000 be/~~not be~~ invoked at this stage for the following reason(s):

No new issues raised.

Section 131 not to be invoked at this stage ☑

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

Signed: Cathy Carleton
EO

Date: 21/1/26

Signed
SEO/SAO

Date

M

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

To

Task No

Allow 2/3/4 weeks
BP

Signed
EO

Date

Signed
AA

Date

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	Will & Catriona O'Flaherty	13/01/2026	Valid	No

Issue	Participant	Representative
BP23 — English	Will & Catriona O'Flaherty	—

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

Comments
—

Filing

Attach to File
☐

Return to EO
☑ Cathy

Signatures

Signed
Cathy Carleton
Cathy Carleton, Executive Officer

Date
14/01/2026

Signed
pp Aine Loughrey
Lauren Simone Murphy, Administrative Assistant

Date
15/1/26

David Behan

From:	Catriona O'Flaherty <cmoflaherty73@gmail.com>
Sent:	Tuesday 13 January 2026 18:45
To:	Appeals2
Subject:	Case No. PL-500109-WX
Attachments:	Reply to ACP and SCA Planning Report 13th Jan 2026.pdf

You don't often get email from cmoflaherty73@gmail.com. Learn why this is important

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.

Re: Tourism Destination Report at Beak and Neamstown, Kilmore Quay, Co. Wexford.
Your Ref:ACP-P1 500109_WX
Wexford County Council Ref: 20250962W

Dear Sir/Madam

We refer to your correspondence dated 17th December, 2025 in relation to a Letter submitted by SCA Planning and Development Consultants on behalf of Applicant Mr. Robert Roche to which we would like to reply.

We ask you to view the attached response please and kindly acknowledge receipt of this email.

Yours sincerely

Will and Catriona O'Flaherty

Neamstown,

Kilmore Quay,

Co. Wexford.

Y35 HY99

12th January, 2026

An Coimisiún Pleanála,

64 Marlborough Street,

Dublin 1.

D01 V902.

Re: Tourism Destination Resort Complex at Beak and Neamstown, Kilmore Quay, Co. Wexford.

Your Ref: ACP-P1 500109

Wexford County Council Ref:20250962W

Dear Sir/Madam

We refer to the letter submitted by SCA Planning and Development Consultants and written by Mr. Simon Clear on behalf of Applicant Mr. Robert Roche dated 1st December, 2025 which we llike to reply to.

Pre-Planning Stage and Due Consideration By Wexford County Council

The Applicant states that an '*open-forum public consultation*' was held which *'provided interactive feedback* before *the application was submitted*'. Yes, an event was held on Friday 2nd May 2025 in the Stella Maris Centre from 4pm to 7pm which was hosted by Stephen Carr Architects. However, we respectfully and strongly disagree with the description provided by the Applicant as a public consultation. On arrival we were greeted with full scale completed drawings and plans and a glossy information leaflet which states '*This information leaflet is produced for the Public Information Event in the Stella Maris Centre on Friday 2nd May, 2025*'

This notice was placed in the Kilmore Notes of the Wexford People:

'Kilmore Quay Integrated Tourism Resort'

You are invited to learn more about an exciting new tourism resort on lands at the Beak and Neamstown, Kilmore Quay.

A public Information Event will take place at the Stella Maris Community Centre Kilmore Quay on Friday 2nd May from 2pm to 4pm, presented by Stephen Carr Architects.

Come along to view the plans for this world class development, set to bring new opportunities to the local community and wider region. Everyone is welcome to attend, refreshments will be served'

The key word 'Consultation' is missing here. This was simply a hard launch of the proposed development with local representatives from the Rosslare Municipal District present. Reporter Simon Bourke of the Wexford People in his article dated Tuesday 6th May 2025 states '*The ambitious plans for the Hotel were unveiled in the* Stella *Maris Centre in Kilmore Quay by local Developer Rob Roche....*'. The Report also states and confirms what was said at the event that '*a planning application is expected to be lodged with Wexford County Council in June 2025 following the Public Information Event'* Given this, there certainly was no scope for public consultation or meaningful engagement beyond the passive viewing of the unveiled plans.

If the applicant is stating that the '*design team conducted lengthy and pre-application consultations'* with Wexford County Council and the public have only had what can be described as an *'Information Event'*, then we the public

have been completely excluded from having any meaningful involvement in the proposed development and its enormous potential impact on us , the future of our community and every fibre of Kilmore Quay Village and its natural habitats.

Overlooking and Loss of Privacy

This has been covered already in our submissions to both Wexford County Council and An Coimisiún Pleanala. In summary, we wish to highlight that the proposed development will result in serious loss of our privacy with direct views into every part of our family home and will completely overlook our family garden. The massive scale of the development will visually dominate our family home (a Bungalow), creating a sense of intrusion and completely reducing our ability to enjoy our family home as we do now. We also anticipate increased levels of noise and light pollution all of which will have a significant impact on our daily lives.

Given our immediate proximity to the proposed access road, restaurant car park and lodges, we have serious concerns about our security, privacy and potential trespass which the applicant has failed to address adequately in his letter. These concerns are still here.

The applicant's letter dated 1st December, 2025 does not give any details of the distances from our house to the proposed development and yet we are the closest house to the proposed development.

I have included a map which the applicant included in his letter showing distances to Brendan O'Flaherty's home but not ours which is highlighted by a green border for your information. Our house is closest in distance and will be seriously and negatively affected by overlooking.

We dispute the reliance of Brendan O'Flaherty's house which is also a Bungalow being described as 6.3m above the hotel ground floor level. The proposed hotel includes four additional storeys above ground level, all of which will overlook his property and neighbouring properties including our own. In addition, the lodges, family suites and restaurant will provide elevated direct views into all surrounding homes which are bungalows.

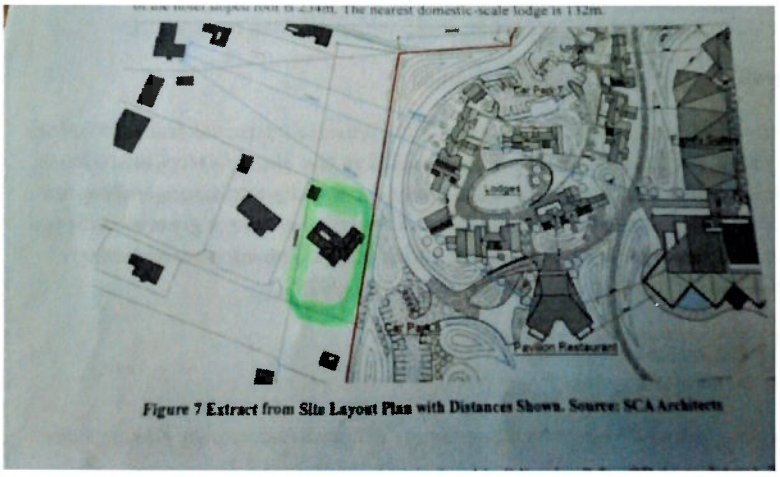


Figure 7 **Extract from Site Layout Plan with Distances Shown. Source: SCA Architects**

Tourism Concept and Viability

The Applicant states that there are several very successful tourist destination resorts in coastal areas in Ireland which do not overwhelm their location or locality and we agree. This is because these resorts are much smaller in size, the majority of which were originally old country houses or manors on established estates with existing mature trees hidden away from the public. These hotels are discreet in nature and have been modified over many decades and have evolved into the hotels we now have. This is in stark contrast to the enormous scale of this hotel on a fresh greenfield site that is fully exposed to the coast, the elements and coastal erosion. There is nothing to hide this development and it poses a threat to the natural habitats of protected wildlife.

So lets compare and contrast based on the hotels in this Report.

Parknasilla Hotel is situated on its own 500 acre estate which includes a golf course. The Manor House (Hotel) dates back to 1692 and the hotel has been in operation for 126 years and comprises of 245 bedrooms.

The Europe Hotel Killarney Comprises of 180 bedrooms. It was originally opened in 1961 with less than 100 bedrooms and extended to 180 bedrooms in 2008

Inchydoney Hotel is situated on its own 150 acres and was originally built in the 1930's and reopened in 1998 after refurbishment and has approximately 70 bedrooms.

Kelly's Hotel Rosslare. Its origins date back to 1893 and it has grown in size over a 133 year period. It comprises of 125 bedrooms.

Virginia Park Lodge is situated on its own 100 acre estate and features its own 9 hole golf course. This was an old country house dating back to 1750 and comprises of 23 bedrooms and up to 100 guests in cottages and cabins.

Adare Manor is situated on its own 840 acre estate with its own world renowned golf course which will host the Ryder Cup. The Manor House as we see it was built in 1832 with the main hotel comprising of 104 bedrooms with an estimated 30 additional bedrooms in lodges and cottages.

Castlemartyr Resort is situated on its own 220 acre estate which includes a golf course. This was originally an 18th Century Manor House comprises of 108 bedrooms with 36 residences.

Galgorm Resort is set within 550 acres of its own estate which includes a gold course. The original house dates back to the 18th Century and consists of 125 bedrooms and an additional 40 bedrooms (estimate) in lodges, cabins etc.

Proposed Development at Kilmore Quay is situated on approximately 50 acres (20 hectares) of land on an exposed green field site. It is a brand new development. It comprises 450 bedrooms including lodges and suites but there is also an additional 55 bedrooms for staff.

The proposed development in Kilmore Quay is still larger than Parknasilla and The Europe Hotel put together. The proposed development sits on approximately 50 acres of land compared with Parknasilla alone with stands on a 500 acre mature estate. No data appears to be given for The Europe Hotel regarding size of land, however, the hotel is situated on a mature secluded site.

The proposed resort is completely oversized for the small village of Kilmore Quay with a population of 460 people in the last census. The contemporary design does not blend well with the vernacular low level houses of Kilmore Quay and its fishing heritage. It is overdevelopment and it overwhelms the location and locality which is why it doesn't work.

Section 7.7.5 Tourist Accommodation Policy of the County Wexford Development Plan 2022-2028 states *'Proposals within towns and villages must be proportionate in size and appropriate in scale, siting, and design settlement.'* It also states that *'The Council will also consider cumulative impacts to avoid over concentration of accommodation that could harm the character or infrastructure of a place.'*

Under the AOT Report compiled by Jean O'Connell and Anthony O'Toole, they claim that *'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'.* We would like to dispute this claim and say that the absence of a large scale resort does not indicate a problem or a need for one. This Report itself clearly admits that Wexford already has a *'strong year round visitor numbers'* without any resort and with *'962,000 domestic visitors in 2024'*.

This report also refers to TM48 and TM50 of the County Wexford Development Plan.

TM48 *'To facilitate the provision of proportionate high quality accessible tourist accommodation and the expansion/upgrade of existing hotels, guesthouses, hostels and B&B's where the use and scale of the tourist accommodation is appropriate to and in keeping with the scale and character of the settlement'*

Fáilte Ireland are incorrect in stating that the proposed 450 bedroom resort aligns to the above as this proposal is not appropriate in scale or in character of the settlement (Kilmore Quay).

TM50 states '*To give consideration to the development of a hotel facility in a rural area where it is demonstrated that the hotel development is dependent on an existing local resource or a unique site character where an overriding need is demonstrated at the location. The development must respect and enhance it's rural location, the existing natural or built features on the site and its landscape setting*'

While Kilmore Quay is a very beautiful and scenic area, it's coastal view can be replicated in any other coastal village or town. Kilmore Quay does not have a single resource of sufficient scale or exclusivity to justify this resort and none have been identified by the applicant. Existing local amenities such as the fishing port, thatched houses are insufficient to support this. The sheer size of this proposal conflicts with the local character and community of Kilmore Quay and it harmful to the rural landscape.

As the proposed resort fails to respect the above principles, it makes the application inconsistent with the overall tourist accommodation strategy in Wexford.

The applicant states that '*the resort is designed to open with **120-200 direct jobs** in Year 1 supported by on site staff accommodation to attract and retain staff.*' As already stated by appellants in their submissions, these jobs are at the discretion of the operator and considering there are 55 on site staff bedrooms, these jobs will not be local.

We disagree with the Reports assumption that the demise of small rural hotels are a result of people wanting a '*distinct, experience rich and resilient hospitality model capable of operating throughout all seasons*'. The closure of many these small hotels across the country has simply been driven by rising operational costs and labour shortages. These pressures do not indicate a lack of demand for the small hotel but financial pressures and being completely under supported by local and national bodies. Small rural hotels often reflect the local and authentic character through traditional hospitality, locally sourced food and connections to the surrounding landscape which the larger hotels cannot replicate. There is a genuine sense of being looked after in the small local hotel rather than being accommodated in large resorts.

Traffic Generation in the Heart of the Village and Traffic Planning Approach

This has been discussed at length by the appellants in their submissions. However just to address somethings which the applicant has said under the heading of Traffic Planning Approach. The applicant refers to an industrial estate in the village. If so, where is it? There are two operational fish factories in the area which are situated about 800m/1km apart. Separately, there is a hardware shop and a single engineering unit beside it. This hardly constitutes an industrial estate.

As the applicant points out that '*local footpath infrastructure will be upgraded to provide links to existing footpaths*', it is important to remember that Kilmore Quay Garda Station and its curtilage is a Registered Protected Structure and has statutory legal protection. Any works that may need to be carried out in relation to the Garda Station and its associated boundary wall etc in order to facilitate a footpath are strictly controlled.

Access to Beaches

We are confused as to what point the applicant is tyring to make with regard to the Beaches. We know the beaches are public and accessible to all. However, if the proposed development goes ahead, it will lead to much over-crowding during summer months. There is one small beach in the centre of Kilmore Quay which is deemed safe for swimming. Considering the guest capacity of the proposed resort is almost double the population of Kilmore Quay, the potential for guests to use this beach would cause this small local beach to be over-crowded. Also take into consideration the number of day trippers to the village during these times. So yes, locals may find themselves being pushed out.

This leads to additional problems in the area. Wexford County Council does not provide any bins whatsoever for Kilmore Quay Village. This has the potential to cause additional littering in the areas surrounding the beach.

It also leads to double parking on the East Pier causing traffic problems for fisherman trying to access their boats and unload fresh fish, refuel and carry out routine maintenance. Yes, there are signs in place to state no parking on the pier but as these rules are not enforced, they are ignored.

The applicant correctly states that Ballyteige Burrow is on the opposite side of Kilmore Quay just off The Furlorn Road. He also correctly states it is a very long beach and it is a public beach. However, the applicant forgets to mention that this beach is deemed not safe for swimming due to currents and no swim signs are displayed on the approach to the beach. A very small car park locally known as the viewing point overlooks the beach. However, it is very small. Access to it is quite tight and double parking frequently occurs on the entrance to it. Due to *lack* of parking in the village, double parking also frequently occurs along the Furlorn Road bringing traffic down to single lane during peak times making it inaccessible to emergency services if required.

Otters and Buzzards and Natural Habitats

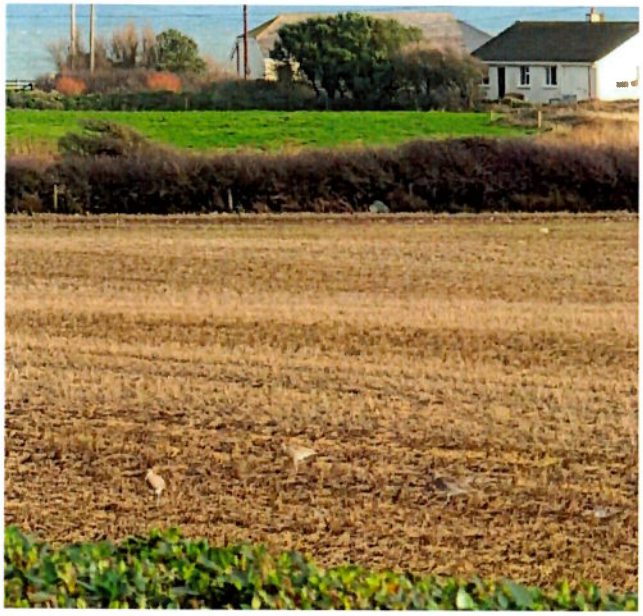
We acknowledge comments and recognition made by the applicant that '*otters have seen in the wider area*' but would like to remind him that otters including otter pups have in fact been sighted in the areas directly surrounding the proposed development site and in order reach neighbouring gardens including ours, they must cross the development site. This makes the whole area part of their habitat and protected under Irish and EU Law.

The applicant does not address the presence of buzzards on the proposed development site in this letter.

The proposed development site is also used as a habitat for migratory birds including the oyster catcher and curlew. Both these birds are on the red list for endangered species in Ireland with the curlew being the only Irish species on the IUCN red list of endangered species. Both birds are protected under the Irish Wildlife Acts 1976-2012 and EU Birds Directives.









Swans have also been photographed on the proposed development site. These are also protected under the Wildlife Acts 1976-2012 and the EU Birds Directive.



Coastal Erosion Comments

The applicant states that "*Wexford County Council coastal engineer indicates medium confidence in relation to the likelihood of loss of ground due to inundation.*" Based on local knowledge and over 30 years' experience in the maritime industry, this assessment significantly understates the extent and pace of coastal erosion currently occurring at this location. The reference to "*medium confidence*" itself suggests a material level of uncertainty on the part of the Council's engineers. Maybe consideration should be given to alternative sites that present no risk from coastal erosion or inundation.

The Wexford County Development Plan, under Development Plan Policies on Coastal Erosion, specifically identifies the stretch of coastline from Tacumshin to Kilmore Quay as erosion-prone. The proposed development site lies within this identified risk area. Photographs submitted with this observation, taken following recent storm events, clearly demonstrate active erosion occurring on the site.

Given the increasing frequency and severity of storm events, rising sea levels, and the well-documented impacts of climate change, it is reasonable to conclude that erosion at this location will intensify over the lifetime of the proposed development. Approving development on a site already experiencing active erosion would therefore be contrary to the precautionary principle and the objectives of the County Development Plan.



Image taken Jan 12th 2026



Image taken Jan 12th 2026



Image taken Jan 12th 2026





Taken Nov 2025




Taken Nov 2025




Taken Nov 2025

DAU, NPWS & Archaeology.

We strongly support DAU, NPWS and Archaeology in their observations.

Visual Impact

This has already been covered by appellants in their submissions but how do you hide a building that reaches up to 21 metres in height that is planned for an exposed coastal south facing greenfield site which makes any attempt to soften or screen its presence with shrubbery or hedgerows virtually impossible. We have seen how attempts by the Waste Water Treatment Plant which shares the same site as the proposed development to grow shrubbery/ hedgerows on its embankment have failed miserably with all plants dying due to the harsh conditions.

Uisce Éireann Water Ban

The Applicant states that the Hosepipe Ban in Ireland in 2025 applied to the entire Country and not just to Kilmore Quay. This is factually incorrect as Uisce Éireann implemented Water Conservation Orders (hosepipe Ban) in specific counties and regions where water supplies were under severe pressure due to prolonged dry weather. The areas affected by the Hosepipe Bans in 2025 were

Initially from early May and extended until mid-October

Kells – Oldcastle Co Meath

Mullingar Co Westmeath

Milford Co Donegal

From July to mid-September, county wide bans were also enforced in

Co Tipperary

Co Waterford

Co Wexford

Co Cork (excluding Cork City)

Notes to conclusion by Applicant:

The Applicant suggests that that there is widespread community and business support. There were 61 submissions sent to Wexford County Council and a further 18 appellants and 11 observations forwarded to An Comisiún Pleanala.

If we can refer back to the Information Event that was held in the Stella Maris Centre in May, attendees were informed that local membership will be available at the leisure centre with a 20m pool, gym, spa with outdoor pool overlooking the sea. This is a point which has been picked up and repeated by Reporter Simon Bourke in the Wexford People article dated Tuesday 6th May, 2025.

The Tourism Report compiled by Anthony O'Toole and Jean O'Connell also state and we quote '*The design has also carefully considered amenities that local residents will use on a daily and weekly basis, strengthening community integration*'.

But surely as an operator has not yet been secured for the proposed development, the applicant and those who act on his behalf cannot make such a statement. This is a decision that only an operator can make. Having researched all the hotels named earlier in this correspondence and who the applicant referred to in his letter, none of these operators allow non-residents to use the leisure facilities of their hotels. Only fee going guests attending the spa can use facilities and that was only for the duration of the spa treatment. Kellys Hotel in Rosslare allowed very limited access to use their Aqua Club but access is purely at the discretion of the Hotel.

So, is this false and misleading information that the applicant and those acting on his behalf are sharing in order to gain local support? If so, this is wrong.

The applicant claims that a number of appellants are not permanent members of the resident village community. To best of our knowledge, all the appellants live locally. We absolutely do as our family home is approximately 2 metres from the boundary of the proposed development.

In the interest of balance and fairness, can it be noted that the Applicant and owner of the proposed development site does not live in Kilmore Quay. Architect, Stephen Carr who also has a vested interest in the proposed development as he has given written consent for land that he owns to be used as part of the proposed development does not live in Kilmore Quay. Some of those who issued letters of support in favour of the development do not live in Kilmore Quay with one individual providing a UK address.

To the best of our knowledge, all those who have completed reports on or behalf of the Applicant do not live in Kilmore Quay. In fact, the majority of contributors to this application have been commissioned by the Applicant Mr. Robert Roche. It would then appear that he has paid for all these reports which could possibly lead to a bias in his favour.

Contrary to the developer's apparent dismissal of local input, local knowledge often represents the most reliable and relevant form of expertise when assessing an area, its community, daily conditions, and natural ecology. Those who live and work in the area possess long-term, continuous observation that cannot be replicated through short-term reports, periodic surveys, mapping exercises, or remote assessments.

We ask An Coimisiún Pleanala to consider all the submissions made by the Appellants and observers and not grant planning permission in this instance.

Yours sincerely

Will & Catriona O'Flaherty