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Chapter 03 Consideration of Alternatives

**An Rinn Rua Hotel and Leisure Park
County Kerry**

**Rinn Rua Holiday Park Ltd
April 2024**

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3. Consideration of Alternatives

3.1 Introduction

This chapter of the EIAR presents a description of the alternatives to the proposed development site, location and design that were considered during the iterative design process, and discusses the rationale for the proposed development option chosen. This section sets out a description of the reasonable alternatives considered by the Applicant, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of environmental effects.

The 2014 EIA Directive (2014/52/EU) Art.5 (1)(d) requires that the EIAR prepared by the developer to contain “a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment.”

This chapter therefore outlines the main reasonable alternatives considered during the project inception and design process and the principal reasons for proceeding with the current planning application.

3.2 Scope

The purpose of alternatives analysis is principally to examine the different possibilities for meeting the Proposed Development's needs and objectives and to determine whether or not the Proposed Development's objectives can be met by different means that avoid, minimise, or mitigate potential significant environmental effects of the proposed Project.

The alternatives considered included the following:

- Alternative Site Layouts;
- Alternative Designs;
- Alternative Wastewater treatment and discharge options
- Alternative Building Materials – External Finishes;
- Alternative Roads and road/path surfaces,
- Alternative Biodiversity Conservation measures, and the
- Do-Nothing Scenario.

Alternative sites and technologies have been excluded from reasonable consideration.

3.3 Need for the Development

3.3.1 Tourism Growth

The Kerry County Development Plan 2022-2028 sets the overall strategy for planning and sustainable development within the administration boundaries for County Kerry. The Plan recognises that tourism is a major economic pillar in the county and a major generator of employment especially in rural communities throughout the county (KCDP 10-3, KCDP 10-6). Consequently, the Plan aims to facilitate the further development of a tourism industry which will act as a key economic driver in a socially and environmentally sustainable manner. In addition, KCDP 10-30 encourages the sensitive redevelopment and / or return to suitable use of derelict, vacant or redundant buildings, in appropriate locations in order to provide for visitor accommodation and tourism development, while having regard to ecological constraints and architectural heritage requirements. By renovating the existing derelict hotel and making effective tourism use of the property, the proposed development will address the need to grow tourism and redevelop existing derelict properties. It is estimated that the proposed development could result in an increase of 3.8% – 4% of tourist bedstock for the county (see Section 4.4.2 of EIAR Chapter 4). By extending the tourism season and diversifying the amenity options and use of Reenroe beach, the proposed development is also likely to increase visitor spend (and contribution to GDP) in the county and consequently increase economic growth.

The proposed development will also contribute towards alleviating the existing shortage of self-catering holiday accommodation in Ireland and the current pressure on existing hotels (due to the government's use of many of them to provide emergency accommodation for refugees and asylum seekers). This shortage is likely to continue in the medium to long term. The tourism data for Ireland and Co. Kerry indicates that the tourist numbers have returned to and exceeded pre-COVID levels in 2022 and 2023. Ireland's appeal as a tourist destination may also grow due to its moderate climate in contrast to the extreme heat experienced in many European countries during recent summer seasons. While the type of accommodation to be provided at this facility has not traditionally popular amongst foreign tourists, it is important to recognise that external factors, such as inflationary pressures or changes in travel preferences, may increase the demand for self-catering holiday accommodations among foreign visitors. One of these is the growth in demand for independent travel (as opposed to group tours) and nature-based tourism noted in the Kerry County Development Plan in the post-covid period.

3.3.2 Alleviating the shortage of Self-Catering Accommodation

The Irish Self-Catering Federation has also recently expressed concern that new planning regulations, which will require existing self-catering accommodation businesses to obtain planning permission or exemptions from the local authority, is contributing to the shortage of self-catering accommodation as it is resulting in the removal of some of these small businesses from the market. (Irish Times – Business Today Section 6th April 2024. <https://www.irishtimes.com/business/2024/04/06/self-catering-accommodation-squeeze-hits-tourists-and-investors-industry-warns/>).

3.3.3 Supporting the Gaeltacht communities

Preserving the Irish language in Gaeltacht areas within Kerry is an important aim of the Kerry County Council Development Plan (2022-2028). It is important to ensure that any developments within the recognised Gaeltacht areas are of benefit to the Irish language and the Gaeltacht communities. The plan aims to promote and develop the Gaeltacht as a centre of linguistic and cultural heritage in tandem with policies which will encourage sustainable economic development in order to ensure vibrant communities (KDCP 8-1). The plan also aims to encourage the provision of facilities for the teaching/learning of the Irish Language (KDCP 8-3).

The proposed development is located within the Uíbh Ráthaigh Gaeltacht. In July 2023, MWP met with a member of Comhchoiste Ghaeltacht Uíbh Ráthaigh to discuss how the proposed development could be of benefit to the Uíbh Ráthach Ghaeltacht. It was discussed that there could be collaboration between the Comhchoiste and the applicant in providing facilities for the language teaching services they offer. Signage throughout the site will be displayed *as Gaeilge*. promote the local Irish Language Tour Guides that offer walking tours in the locality.

Indirect benefits? Jobs, houses. Vibrant communities.

3.4 Alternative Sites

The developer is the owner of the land for the proposed development. They own and manage a number of other mobile home parks in Ireland. They purchased the land and old derelict hotel with the intention of renovating the hotel and developing a leisure park. Planning permission for the renovation of the hotel was previously granted to a former owner; this permission has since lapsed, and the current owner now wishes to develop the tourism potential of the site. This site is ideally situated on the Wild Atlantic Way and Ring of Kerry tourism routes due to its location on the headland with prominent sea views and easy access to the Reenroe beach which is the largest sandy beach on the Iveragh peninsula. Consequently, no other reasonable alternative sites for the proposed development were considered by the developer.

3.5 Alternative Site Layouts

3.5.1 Scale and Layout of Development

A total of seven layout alternatives were considered during the design phase of this planning application. These are illustrated in **Figures 3-1 to 3-7** and the main characteristics tabulated in **Table 3-1**. The developer's original maximized proposal was to renovate the old derelict hotel into self-catering apartments and in addition, make provision for 205 no. mobile homes, 30 no. holiday lodges, 20 no. glamping pods, 6 no. hobbit huts, and 20 no. campervan parking spaces. The design and environmental teams considered the developer's needs and the constraints and opportunities on the site and developed a preliminary maximised layout for the site (see Option 1 in **Figure 3-1**). The density of this layout was assessed by both the design and environmental teams and was ruled out due to the limited potential for landscape screening options to reduce the visual effects, the lack of sufficient green spaces and ecological corridors, the large volume of waste-water treatment required and the potential adverse traffic effects. Thereafter a number of less dense and rearranged layout options (see **Figures 3-2 to 3-7**) were developed and considered by the team. **Table 3.1** below provides a comparison of the number of facilities and accommodation units included in each alternative site layout.

It should be noted that the location and design of the hotel, leisure centre, central car park, main entrance road, the private access road for the neighbouring houses on the south-west corner and the location of the maintenance building remains the same for all the layout options.

Table 3-1: Summary of Differences in quantity of facilities between the various Layout Alternatives Considered

Facilities	Details/Notes	1	2	3	4	5	6	7
		Alternative Site Layouts						
Hotel	Refurbishment with conversion into 24 self-catering apartments and restaurants, bar, lounge and shop.	1	1	1	1	1	1	1
Leisure Centre	New facility behind hotel	1	1	1	1	1	1	1
Lodges	Different locations and numbers	30	31	25	25	25	25	25
Mobile Homes	Varying numbers	205	159	152	144	116	168	144
Glamping Pods	Different locations and numbers	22	22	20	20	20	20	20
Hobbit Huts	Location variations	6	6	6	6	6	6	6
Camper vans	Different locations and numbers	20	20	20	20	20	20	20
Tent camping area	0.8 ha with 20 serviced sites at 1 site	0	20	20	20	20	20	20
Surf School & Beach Café	Different sizes considered on same site.	1	1	1	1	1	1	1
Total Number of self-catering accommodation units		262	268	259	239	211	263	239

Layout option 2 reduced the number of mobile homes by 46 and moved the holiday lodges to the northern corner and places the glamping pods closer to the coastline and the camper vans adjacent to the central car park. This option provided for 159 mobile homes, 31 lodges and 22 glamping pods as well as campervan and camping spaces/facilities. Relocating the large holiday lodges to the northern corner and putting the smaller pods closer to the sea would have negative financial consequences for the venture.

Layout Option 3 further reduced the numbers to 152 mobile homes and 26 lodges with no change in the number of number of pods, huts and camper van spaces, but a camping area was added. The layout was similar to option 1 (the original design). This layout was considered to be too dense and required a further reduction in the number of mobile homes.

Layout option 4 aligns more with the original layout but further reduced the number of mobile homes to 144. This option also provides a larger continuous green space and ecological corridor through the centre of the site. This is closest to the proposed option.

Layout option 5: This was based on a spiral/circular layout for 168 mobile homes. Other components remain the same as Options 3-5. In this option the central green corridor was broken up, but more landscaping is provided around edges with less usable open green spaces. This option was ruled out as it would make the provision and maintenance of underground services more difficult and would compromise the central green/ecological corridor through the centre of the site. It would also run counter to the adopted principle of dividing the site into smaller parcels aligned with the traditional rectangular field patterns typical of this part of Ireland.

Layout Option 6 is the final proposed layout which incorporates the best of all the previous layouts. It has a similar layout to options 3 and 4 except for the arrangement of the pods and hobbit huts and their access paths. Like option 4 it also has 144 mobile homes laid out on a grid type pattern, and a central green/ecological corridor.

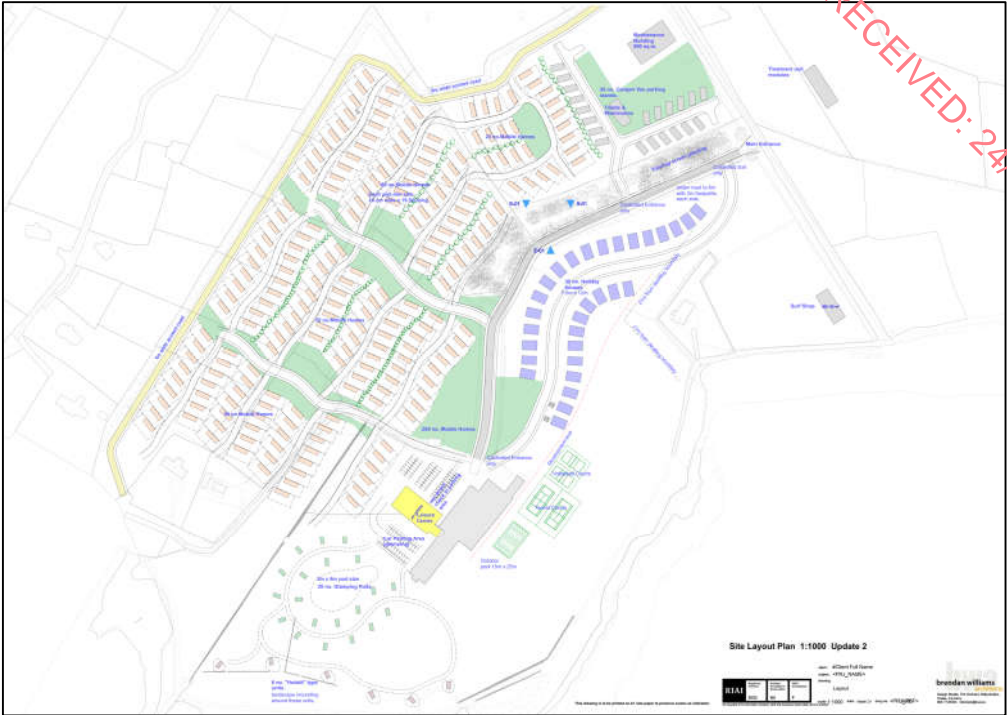


Figure 3-1: Option 1: Preliminary Maximised Layout – 205 mobile homes, 30 lodges, 20 pods and 6 H Huts, & 20 campervan parking spots (no tents)



Figure 3-2: Option 2: With 159 Mobile homes, 6 Hobbit Huts, 22 Glamping Pods closest to the beach and 31 Holiday Lodges in north-eastern corner of site and site for camper vans next to parking lot.



Figure 3-3: Option 3: With 152 Mobile homes, 26 Lodges, 20 Glamping pods, 6 Hobbit Huts, 20 Campervan parkings, and tent camping area in the northern corner of the site, and a larger continuous green/ecological corridor through the middle of the site.



Figure 3-4: Layout Option 4: Similar to option 3 but with 144 Mobile Homes and the same other facilities and layout to Option 3.



Figure 3-5: Layout Option 5 with spiral/circular layout for 168 mobile homes.



Figure 3-6: Layout Option 6 (the proposed development): Similar to Option 4 with 144 Mobile Homes, but with a revised access layout for pods and hobbit huts.

The preferred and proposed layout is Option 6. This alternative is very similar to option 4 except for the arrangement and routing of the access paths for the pods and huts. These accommodation units were also reoriented to face the sea. This alternative represents the least dense layout that ensures the financial viability of the proposed development and provides space for landscape screening and a central green amenity area that also functions as an ecological corridor through the site.

3.5.2 Public Beach Parking

The possibility of developing a public beach parking area on the east side of the Reenroe beach access road, opposite the proposed surf school and café was considered during the design phase. However, the development of a public beach parking area at the proposed development site is not included as part of this planning application. While the developers are willing to make land available to the KCC for use as a future public parking facility, they are not willing to take responsibility for the ongoing management of a public parking area. The development of a car parking area at this site would need to be the subject of a separate planning application.

Inny Strand is almost 3km long and is divided by the River Rinny estuary (see **Figure 3-8** below). The western half is known as Reenroe beach and the eastern half as Waterville beach. It is one of the few large sandy beaches on the Iveragh Peninsula. There are two roads providing public access to Reenroe beach (see yellow circles marked in **Figure 3-8**). One is the beach access road for the proposed development and another is a small access road further inland and up the Rinny estuary. Neither of these access points sites have significant public parking areas and beach users tend to park along the road. During the summer there is often considerable traffic congestion and difficulty finding parking along the Reenroe beach access road at the proposed development site.

More provision for public beach parking is available for Waterville beach. The most significant of these is at eastern end of Waterville beach where there are parking spaces for 30 vehicles at the entrance to the Waterville Golf Links course and the Smugglers Inn. There is another small access road and parking area further up the estuary (see orange circle in top right hand corner of **Figure 3-8** below).

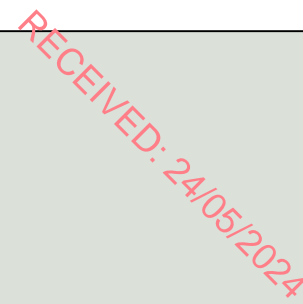
Given this context, the development of a public car park at the western end of Reenroe beach would facilitate greater beach access for the large numbers of visitors to County Kerry during the summer season, as well as local residents. It would also improve traffic and beach safety at this site.



Figure 3-7: Aerial Photograph of Reenroe Beach indicating the four existing public road accesses to the beach.

The development of a formal parking lot at the proposed development site would potentially alleviate the current summer traffic congestion and safety concerns at the site and improve the viability of a future application for blue flag status for the beach. The only other blue flag beach in the immediate vicinity is the Ballinskelligs beach to the west which is 1km long and has a 400m identified swimming area. The other nearest blue flag beaches are the Derrynane Beach 13km to the south-east (with a 160m swimming area) and White strand at Caherciveen, 15km to the north (with a 450m swimming area).

A potential concept proposal with 62 parking spaces and 5 accessible parking spaces is illustrated in **Figure 3-9** below. This was considered during the design process but is not included in the current planning application for the reasons mentioned above.



3.6 Designs

Two designs were considered for the refurbishment of the existing derelict hotel building: 1) a preliminary design, and 2) the final proposed design. The main difference between these options is the external balconies on the accommodation wing and some internal rearrangements of spaces and facilities of the northern catering wing.

Due to the extensive destruction of the northern catering wing, it is proposed completely rebuild this section from the foundations. The preliminary designs for this were largely the same as the previous hotel plans, but these were later revised to allow the use of the bar and restaurant facilities to be reduced and expanded with the seasonal fluctuations in visitor and staff numbers. Some multi-functional spaces are included in this wing to allow

for a number of small separate functions and/or large functions where some bar/restaurant spaces are opened up and combined.

3.6.1.1 Preliminary Designs for the Accommodation Block

A drawing of the proposed exterior of the southern accommodation section is provided in Figure 3-10. This drawing illustrates the proposed glass fronted balconies running along the full length of the first and second floors (on both the back and the front of the building), and the terrace with glass railings overlooking the sea on the existing roof of the building with the restaurant at the back. In this design the external appearance of the tower block is not significantly changed.

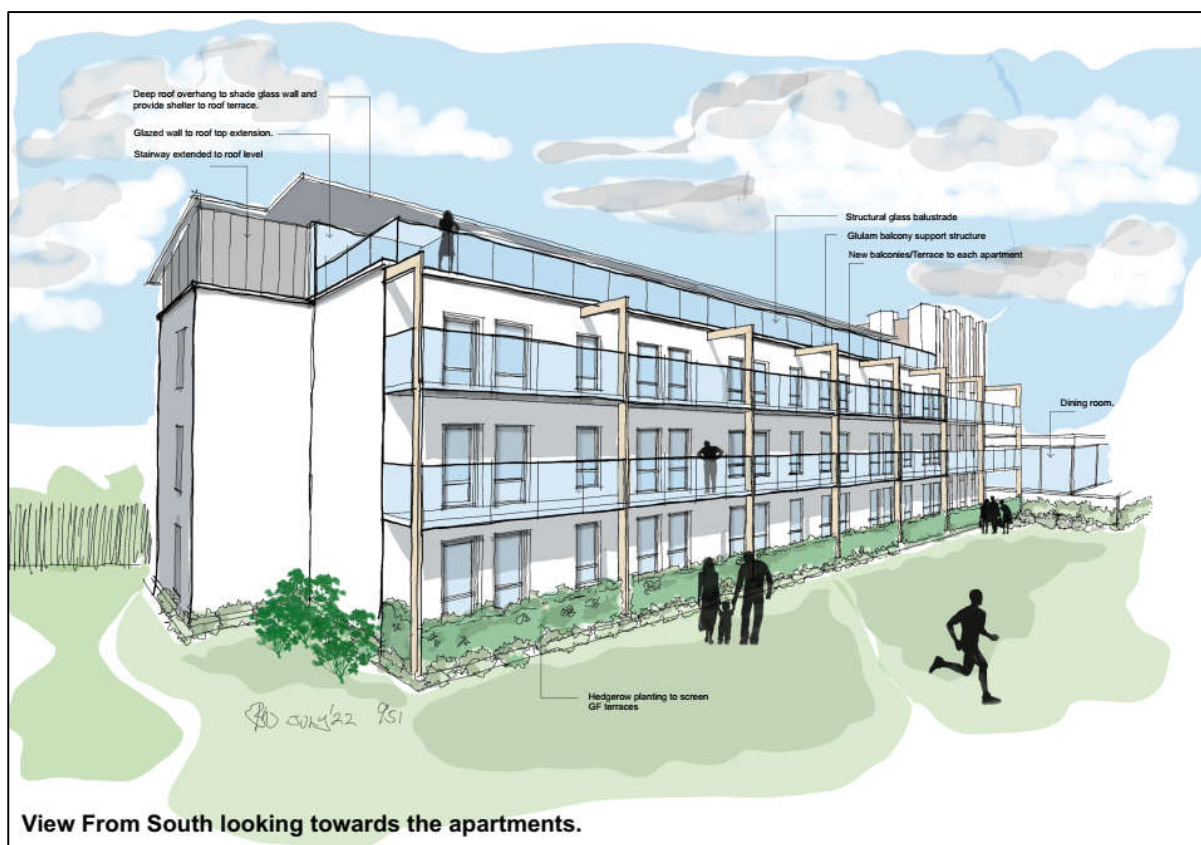


Figure 3-9: Drawing of preliminary design of the hotel accommodation block and roof.

3.6.1.2 Option 2 – Final Proposed Hotel Design

The final proposed design for the hotel accommodation block (see **Figures 3-11 to 3.12**) has removed the initial full-length balconies on the first and second floors and provides for five separate smaller balconies on each floor. This further breaks up the block impression of the building. The roof and external cladding of the tower has also been changed to modernise and visually integrate the tower into the rest of the building. The zig zag roof façade of the catering section is also designed to visually break up this block and improve its integration into the visual landscape. The objective of these designs is to improve the aesthetic of the hotel, integrate it into the landscape and improve and reduce the visual effect.



Figure 3-10: South and Northern Elevations of the proposed hotel exterior (excluding the Leisure Centre).



Beach (south) side of the Hotel



Parking lot side (north) of the catering section of the hotel

Figure 3-11: Rendered Images of the proposed hotel designs from the north and south.

3.6.2 Leisure Centre

Originally the leisure centre element of the proposal was going to be submitted for planning permission at a later stage. However, due to the high public demand expressed at the public meeting, the applicant decided to include the leisure centre as part of the initial proposals in order to provide more public facilities for the local population.

3.6.3 Beach Café and Surf School

It is proposed to develop a surf school and café at the bottom of the access road and adjacent to the Rinn Rua beach. These will provide amenities for visitors to the beach and will facilitate progress towards obtaining blue flag status for Rinn Rua beach. These will be run as separate business entities that are likely to be contracted out by the developers.

Two concepts and designs for the proposed beach surf school and café were considered during the design phase. The first of these was larger and provided facilities for an operational restaurant with food preparation and dining facilities in the café space and parking for 41 customer vehicles and 2 access parking spaces (see **Figures 3-13 to 3-15**). The second preferred design is for a smaller facility with a small beach café/shop (with no food preparation facilities) and seven off-road customer parking spaces and one access parking space (see **Figure 3-16 and 3-17**).

The smaller design was considered preferable due to the uncertainty over the viability of a large facility (given the seasonal fluctuations in visitors) and to avoid creating traffic and congestion problems by attracting large numbers of visitors to the beach where there are limited parking facilities for the public. These smaller facilities would also be less visually intrusive.

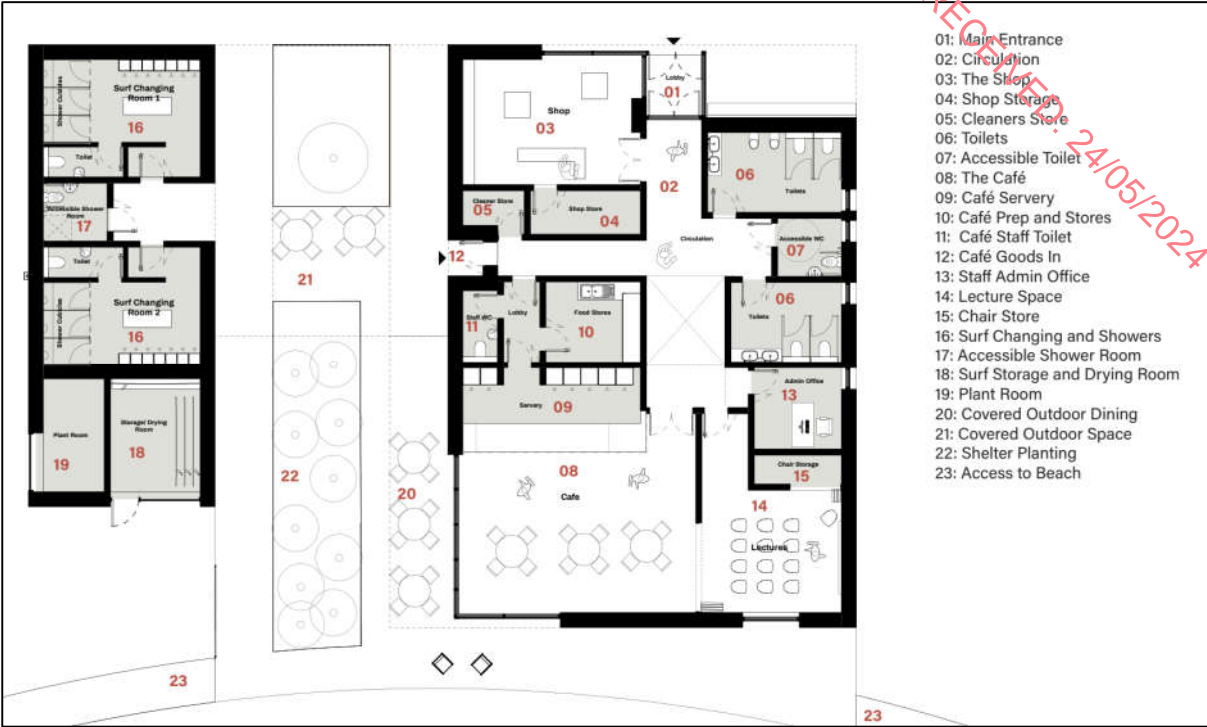


Figure 3-12: Preliminary Design of large beach surf school and café. (Floor area of 283.3m²)



Figure 3-13: Rendered Image of the preliminary larger design for beach surf school and café.

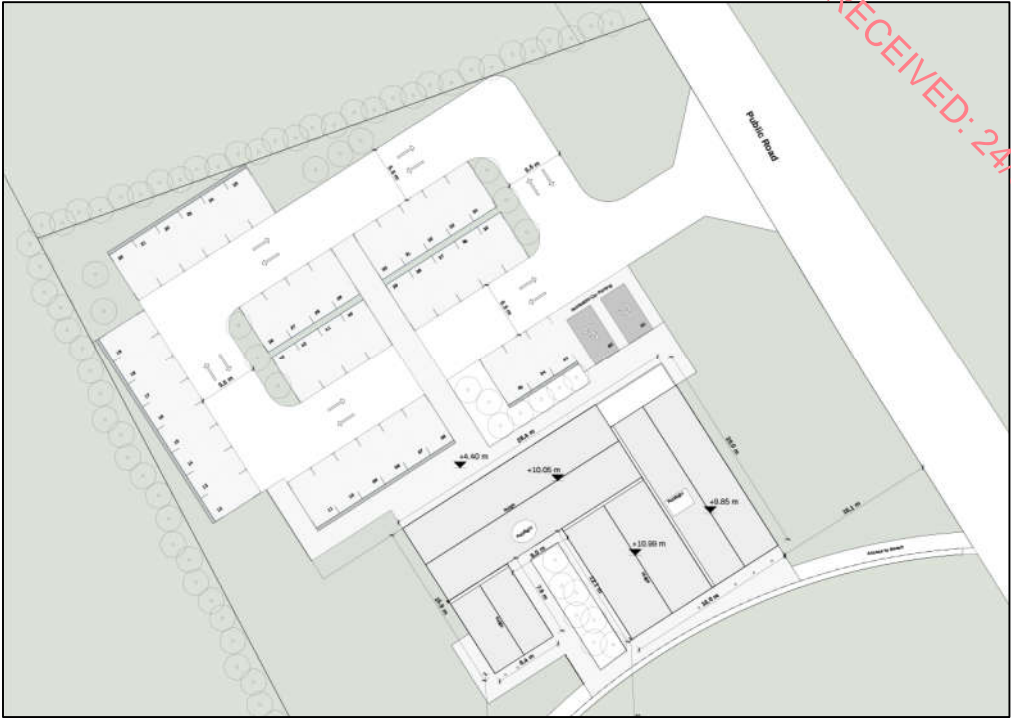


Figure 3-14: Site layout for preliminary larger design for beach surf school and café.



Figure 3-15: Revised and downscaled design (floor area of 214.3m3).

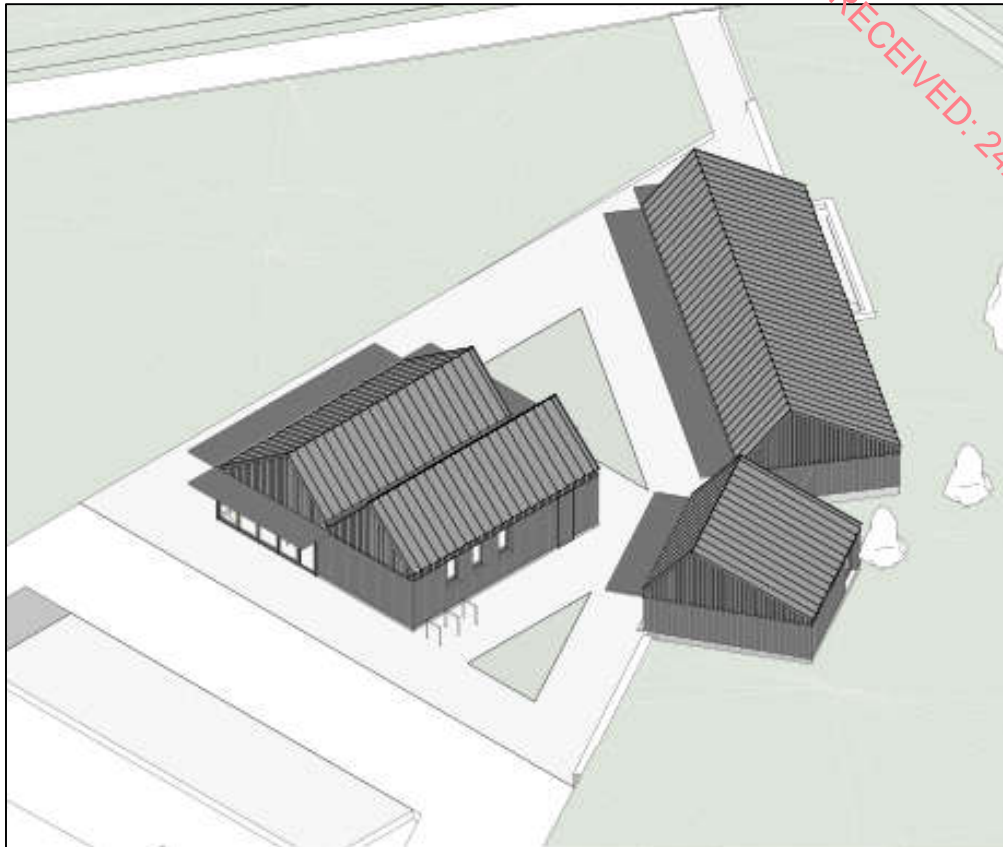


Figure 3-16: Revised and proposed layout and elevations for beach surf school and café.

3.7 Building Materials

Building Materials selected for the Hotel Accommodation Block:

The existing external block work walls are largely uninsulated or have minimum insulation. Two insulation methods were considered, namely:

1. Lining the internal face with insulated plasterboard.
2. External insulation.

External insulation was selected as it will allow the external walls to achieve a higher level of thermal efficiency (lower U Value) than internal lining and it will not reduce the available floor area internally, as would be the case with internal lining.

Balcony Structures for Hotel.

Two options were investigated:

1. Stainless steel structure.
2. Polyester powder coated galvanised steel structure.

Option 2 was selected for durability and economic reasons.

Balustrades to roof top extension and balconies on Hotel.

Two options were investigated:

1. Stainless steel or galvanised steel railings.

2. Structural glazing.

Option 2 was selected due to the exposed location of the building. The glazed balustrade will provide some relief/shelter from the wind. Steel railings would not provide any shelter.

Hotel Standing Seam Roof finish

A low pitch design to the roof top extension was chosen to keep the overall height increase to a minimum. A slate or concrete tile roof finish will not perform at such a low roof pitch and exposure location. The standing seam metal roof finish was therefore selected on the basis of performance at a low roof pitch and because of the aesthetic appearance.

Hotel Standing seam metal wall cladding to roof top extension.

We selected the standing seam wall finish to assist in visually minimising the overall height of the building. The standing seam wall finish will match the standing seam roof finish. The standing seam wall finish will assist in ensuring that the mass and scale of the bedroom block is minimised - the external wall finish and roof will appear as one when viewed from a distance.

Windows and External doors.

We considered 3 options:

1. uPVC
2. Alu-clad type timber windows with aluminium outer frame
3. Polyester powder coated thermally broken aluminium.

The uPVC was considered to be environmentally inappropriate and would lack the durability required at this exposed location. Alu-clad windows were discounted on the basis of costs and durability at this exposed location. Polyester powder coated, thermally broken aluminium windows were selected based on the following characteristics:

- Durability
- Thermal performance
- Range of colour options
- Costs
- Structural performances where curtain walling is required to the pool hall.

3.8 Roads

3.8.1 Reenroe beach access road

As indicated in Plate 3-1 below, the existing Reenroe beach access road (L-7535) is a narrow rural road that does not permit the passage of two vehicles. The first alternative considered was to make no changes to the existing road. This was not considered suitable given the large increase in traffic that the proposed development would create. The second alternative was to enable better site access by providing a few lay-byes to enable vehicles traveling in opposite directions to pass one another. This option was also not considered suitable or sufficient given the scale of the development proposed and the maximum number of visitors and vehicles that could potentially use the road during the peak holiday periods.

The proposed option is to widen the existing Reenroe beach access road to 6m and provide for two-way traffic all the way down to the end of the road adjacent to the beach and the proposed surf school and café. To further improve access and safety, it is also proposed to develop an adjacent shared pedestrian/cycling path on the east

side of the road that will be separated from the road by a raised green verge. The proposal also includes some minor changes to the junction with the R567 to improve access and site lines.

(The alternatives with regard to the beach parking area have already been discussed in section 3.4.2 above).



Plate 3-1: Photograph of existing Beach Access road (L-7535) from the R567 to Reenroe beach.

3.8.2 Access road for private dwellings in south-west corner

The two neighbouring dwellings in the south-west corner of the development site currently access their properties via a track through the development site. Their access to water and electricity is also currently provided through the hotel property. The possibility of the owners continuing to access their properties through the development site was initially considered but ruled out. This was not considered practical or safe during the construction phase, and not optimal during the operational phase. A separate private access road (and underground services next to the road) for these dwellings was then considered. This would provide them with a safer private access road and services along the road, as well as visual screening from the development.

A new access road and water/electricity services was then designed for these dwellings that runs along the western boundary of the proposed development site. The developers will also make use of this new road as a construction and maintenance access road during phases 2-4 of construction and during the operational phase. Two locked entrance gates to the Hotel and Leisure Park will be provided along this road.

3.8.3 Internal Assess Roads

Only one central entrance road to the hotel was considered in the layout options. However, the layout of other access roads to the various accommodation facilities within the site were considered. For all layout options besides option six, the access roads for the mobile homes are laid out in a grid type pattern. Option 5 presented a spirals/circular access road option, that was ruled out due to the difficulties of routing and maintaining underground site services.

A circular pedestrian access path for the pods and a separate ring for the hobbit huts was initially proposed (see site layouts 1-5). This was later changed (see option 6) to various branched access paths for the pods and the hobbit huts in order to reduce passing pedestrian traffic (improve privacy) and better facilitate service provision.

3.8.4 Road and path surfaces

Initially the design team proposed the use of self-compacting gravel for the cliff path to reduce the amount of hard surfaces and improve drainage. However, for access and maintenance reasons the more traditional tarmac surface was selected. The permeable self-draining options were ruled out due to high maintenance concerns and not being fully accessible. Paving is proposed to be limited to the pathways along the main access road to the hotel and the central parking area.

3.9 Wastewater Treatment

The development site is not currently connected to the existing Uisce Éireann (UÉ) (formerly Irish Water) foul water network. The option of discharging to the Uisce Éireann (UÉ) (formerly Irish Water) network was explored. UÉ was consulted and indicated that the Ballinskelligs WWTP is at its capacity and cannot accommodate any additional loads. Consequently, the proposed development will need to develop its own waste-water treatment plant (WWTP) on site.

Malloy (precast) Environmental Systems were commissioned to identify a suitable waste-water treatment plant for the proposed development on this site that meets the required environmental and planning standards. They have been operating since 1983 and offer a comprehensive range of wastewater treatment plants for both single houses and large developments in Ireland. Malloy Environmental Systems have ISO 14001 certification and National Standards Authority of Ireland (NSAI) accreditation for environmental management, in addition to certifications for quality and health & safety.

The proposed waste-water treatment system proposed for this development by Malloy Environmental Systems is a tertiary waste-water treatment plant (see **Chapter 2** of the **EIAR** for details and the **Roads, Water, Waste-Water, Storm Water and Flood Risk Assessment Report**).

A suitable location for the WWTP on the main development site to the west of the Reenroe beach access road was investigated but ruled out due to space limitations and proximity to the proposed accommodation facilities. The proposed site for the WWTP is to the east of the Reenroe beach access road (see **Figure 2-7**). This site was chosen as it is located away from the visitor facilities and any existing neighbouring dwellings, as well as at a distance from the beach access point.

Three discharge options for the treated water were also considered. The first was to discharge to the existing drainage channel along the Reenroe beach access road. The second was to discharge to the wetland on the east side of the Reenroe beach access road and further filter the treated water through the wetland. Given the concerns about the ecologically sensitive nature of the soil and vegetation in that area and its proximity to the beach, the SPA/SAC and the public beach access point, these options were not considered further. The third and preferred option is to discharge the treated water to a number of constructed underground percolation areas in front of the hotel and some of the lodges. Percolation tests were undertaken in the proposed discharge area to assess percolation capacity of the soil and inform the design of the percolation cells. The size of the percolation area is determined by the maximum volume of wastewater to be discharged. More details of this system are provided in section 3 of the Civils report for this planning application. The assessment of attenuation and assimilative capacity of the ground and marine water resources of this preferred discharge option indicates that the effects on ground water resources and marine water resources would be within the required thresholds for BOD, Orthophosphate and Ammoniacal Nitrogen levels.

Another discharge option that was considered was a direct timed discharge of the treated water to the existing outfall. This would make use of the existing unused concrete septic tank system (14m by 32m) and its outfall pipe running to the foreshore to the south of the site. Any discharge through this option would need to be timed to coincide with the high tide to ensure maximum depth and effective advective mixing in the receiving water body. This option would require a discharge licence.

The assimilative capacity of this alternative has been assessed in the **Roads, Water, Waste-Water, Storm Water and Flood Risk Assessment Report** and is considered a possible but not a preferred option, so as to avoid discharging directly into the sea and Natura 2000 site.

3.10 Biodiversity Conservation and Habitat Enhancement

3.10.1 Use of old cottage for roost

The existing derelict stone cottage (see Plate 2-14) which lies just to the north-east of the derelict hotel was considered for use as a store, services facility and other uses. Following consultation with the project ecologists, it is now proposed to be retained and enhanced for biodiversity by improving the suitability of the structure for roosting bats or breeding birds. Sensitive lighting and landscaping will also be utilised to enhance this feature for biodiversity.

3.10.2 Biodiversity Enhancement area

The area of land which lies east of the proposed development site and Reenroe beach access road is under the control and ownership of the Applicant and is currently leased out for agricultural uses. This area was not considered suitable for the proposed development due to the wet/peaty soils and wetland habitat in this area and its proximity to the Inny Estuary SAC.

This area (see Figure 2-27) has been proposed as a targeted Biodiversity Enhancement Area (BEA). The BEA will be set aside specifically for long-term biodiversity enhancement. The Biodiversity Enhancement Plan will involve the following proposed measures:

- Drain Blocking and Reprofilling to support the development of wetland plants and restore a natural flood regime.
- Pond/Wetland creation and enhancement on some low-lying land in the east/south-east portion of the land where there is a reedbed.
- Livestock management measures regulating the type, number and seasonal grazing patterns of livestock grazing to support the biodiversity enhancement of the area.
- The use of biodiversity friendly land management practices
- Fencing off the stream to revegetate and stabilise the bank of the channel.
- Chough habitat management measures (grazing management).
- General tidy up (to remove litter)
- Installing bird/bat boxes
- Providing interpretive and educational signage at strategic places where they will be accessible.

3.11 Do-Nothing Scenario

The hotel was developed in the 1960s and has remained unused and derelict for around 40 years. The development site has previously been subject to positive consideration for tourism accommodation proposals. There are four planning applications that have been made for this site since 1992. All of these were for some kind of hotel, with two of them also involving the development of a golf course. Two were refused and two permitted, but none were developed.

If the proposed development is not permitted, then the hotel building will remain and further deteriorate and the land will continue to be used for grazing. The public walk along the cliff will also remain as is. The landowners may also seek to sell the land. The most likely development option for this site in the long-term is tourism.

The Kerry County Development Plan 2022-2028 (para. 11.6.3.1 and KCDP 11-71) identifies this area as high potential tourism development land. The Plan recognises that tourism is a major economic pillar in the county and a major generator of employment especially in rural communities throughout the county (KCDP 10-3, KCDP 10-6). It also notes the importance of the tourism sector to the local economy and that care must be taken to balance growth with the protection of the landscape. Kerry Tourism is seeking to increase the number, breadth, depth and quality of the tourism experiences across the county maximising the opportunities presented by the Wild Atlantic Way.

However, the level of tourism development that will be permitted in this area will depend on the degree to which it can be integrated into the landscape and achieved a balance between the protection of sensitive landscapes and the appropriate socio-economic development of these areas.

This land remains prime tourism development land. However, the derelict hotel is an eye-sore and detracts from the beauty/attraction of the site (see **Plate 3-2** below). Ideally the hotel should be redeveloped to make use of the existing building and resources used to originally construct it. Given the high cost of renovating this derelict building, it is inevitable that other facilities need to be developed on the site to make it a financially viable business proposition.

Given the Kerry County Council policy restricting the development of rural land for individual holiday homes, it is unlikely that planning permission to divide the property and develop individual holiday homes would be granted.



Plate 3-2: Photograph of Derelict Hotel on the proposed development site.

3.12 Summary

The alternatives considered included the following:

Category of Alternatives	Summary
Sites	No alternative sites considered
Site Layouts;	Seven layouts considered with varying densities and arrangements of facilities
Designs;	Two external designs for the Hotel and two designs of different scale for the Surf School and Beach Café
Wastewater treatment and discharge options	Considered but ruled out discharge to UÉ network, then developed proposal for an on-site WWTP and three different discharge options.

Category of Alternatives	Summary
Building Materials;	Alternative building materials for the external finishes on the hotel were considered and the choices made took into consideration durability, thermal properties, environmental suitability, visual effects and cost.
Road options and road/path surfaces,	Various road widening options were considered for the Reenroe beach access road, road access options for the neighbouring dwellings, various internal road layouts and different road/path surfaces.
Biodiversity Conservation measures	Considered continuing to lease out the remaining land to farmers or to manage the land as a compensatory Biodiversity Enhancement Area. Also considered various uses for the Derelict Cottage on the site and chose to use it for Bat and Bird Roost/Nest and Habitat
Do-Nothing Scenario	The Do-Nothing Scenario is not an option for the developer and is not a socially or economically valuable use of the land and the derelict structures on it.

Based on the assessment of reasonable alternatives (in relation to site layout, designs, roads, services and biodiversity) relevant to the proposed development and its specific characteristics as set out in this chapter, the selected layout is considered to be the most practical and acceptable of the six options considered from both an environmental perspective and a planning perspective. In terms of building designs, the developer has selected designs which will integrate the buildings into the landscape and its character and be visually appealing. In terms of the wastewater treatment and discharge, the proposal is to treat the water to the highest quality and safely discharge it to ground on the development site in a manner that will avoid any potential negative effects to ground water, the marine protected areas or public health. With regard to road options, the alternative chosen aims to meet the needs of all the affected parties including the public and other beach users, the neighbouring dwelling owners, the developers/managers of the proposed facility and the visitors. In terms of biodiversity conservation, the preferred option aims to make use of the derelict cottage and the adjacent coastal land to maintain and enhance ecological habitats for the native species. The choice of plants for the landscape plan will also aim to support and enhance habitats for native and threatened species.

The site is currently zoned as a visually sensitive area located along the Ring of Kerry tourism route. The Developer is committed to managing the development and the site to ensure it sits well within the landscape, is not visually intrusive, restores the old derelict hotel for tourism, provides additional visitor accommodation and diversified amenities, retains public access to the beach and coastal walkway, accommodates the needs of the three neighbouring dwelling/land owners, supports biodiversity and habitat conservation and does not pollute the environment or protected areas.

The siting of the proposed development is the coastal zone on a site previously used for tourism activities. The overall design of the facility has been carefully selected based on the needs of the developer and an assessment of the site, layouts and technologies, undertaken in line with EIA legislation and the prevailing guidelines and to minimise environmental effects.

In conclusion, it is considered that the proposed site has significant capacity for this development and is highly suitable for this proposed tourism development.

3.13 References

The Kerry County Development Plan 2022-2028.