MWP

Rínn Rua Hotel and Leisure Park

Environmental Impact Assessment Report (EIAR)

Volume I: Non-Technical Summary

Rínn Rua Holiday Park Ltd

Project No. 21513

April 2024

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1. Introduction

Rínn Rua Holiday Park LTD., (the 'Applicant') is seeking planning consent from Kerry County Council for a proposed Hotel and Leisure Park, at Reenroe, Ballinskellligs, Co. Kerry (hereafter referred to as the 'site').

MWP have been engaged by the Applicant to prepare an Environmental Impact Assessment Report (EIAR) to accompany the planning application. The Applicant, Rínn Rua Holiday Park Limited, has experience in successfully running holiday parks in Ireland.

A detailed description of the entire project is given in **Chapter 2 of Volume 2 of the EIAR**. This Non-Technical Summary (NTS) is the first volume of the EIAR for the proposed development. The other three volumes which comprise the EIAR are:

- Volume 2: Main EIAR;
- Volume 3: Appendices; and
- Volume 4: Photomontages.

The purpose of this Non-Technical Summary is to provide a concise overview in non-technical terms of the project, environmental effects and mitigation measures highlighted by the Environmental Impact Assessment and presented in detail in the main EIAR, Volume 2.

As part of the scoping process, informal consultation was carried out with a number of relevant parties. Consultation through meetings, letters, email and telephone calls with various statutory and non-statutory consultees was undertaken during the EIA process. Pre-planning meetings were undertaken with the relevant Kerry County Council departments. The aim of these initial meetings was to present the project and to receive initial feedback on any potential issues of relevance that should be addressed through the EIA process.

Written notifications were circulated to a number of identified stakeholders (both statutory and non-statutory consultees), which set out an overview of the project proposal. The notifications invited feedback from the consultees on any key issues and concerns which they consider should be addressed. The issues raised were subsequently taken into account in the EIA process.

A Public Information Event was advertised and held on the 8th of June 2023 in the Ballinskelligs Community Centre from 5pm to 8:30pm. Draft proposals were put on display and the public were able to view them and speak with the two agents from MWP who were available to answer any questions they had regarding the proposals. The public also had the option of completing a feedback form which allowed them to make a written submission regarding any concerns they had.

2. Description of the Proposed Development

2.1 Site Location and Description

The subject site is located on the shores of Ballinskelligs Bay on the Iveragh Peninsula, between the coastal town of Waterville and the village of Ballinskelligs,. in the Uíbh Ráthaigh Gaeltacht. Reenroe Beach, which is located adjacent to the site, is a popular stop along Wild Atlantic Way and Ring of Skellig tourist routes. The proposed development site location in context of the wider County Kerry area is shown on **Figure 1**.

The site is located to the south of the R567 and to the north and west of Reenroe beach. The Dungeagan to Reenroe Walking Loop and the Emlagh Loop Ballinskelligs pass through the site. Agricultural lands surround the site to the north, east and west.

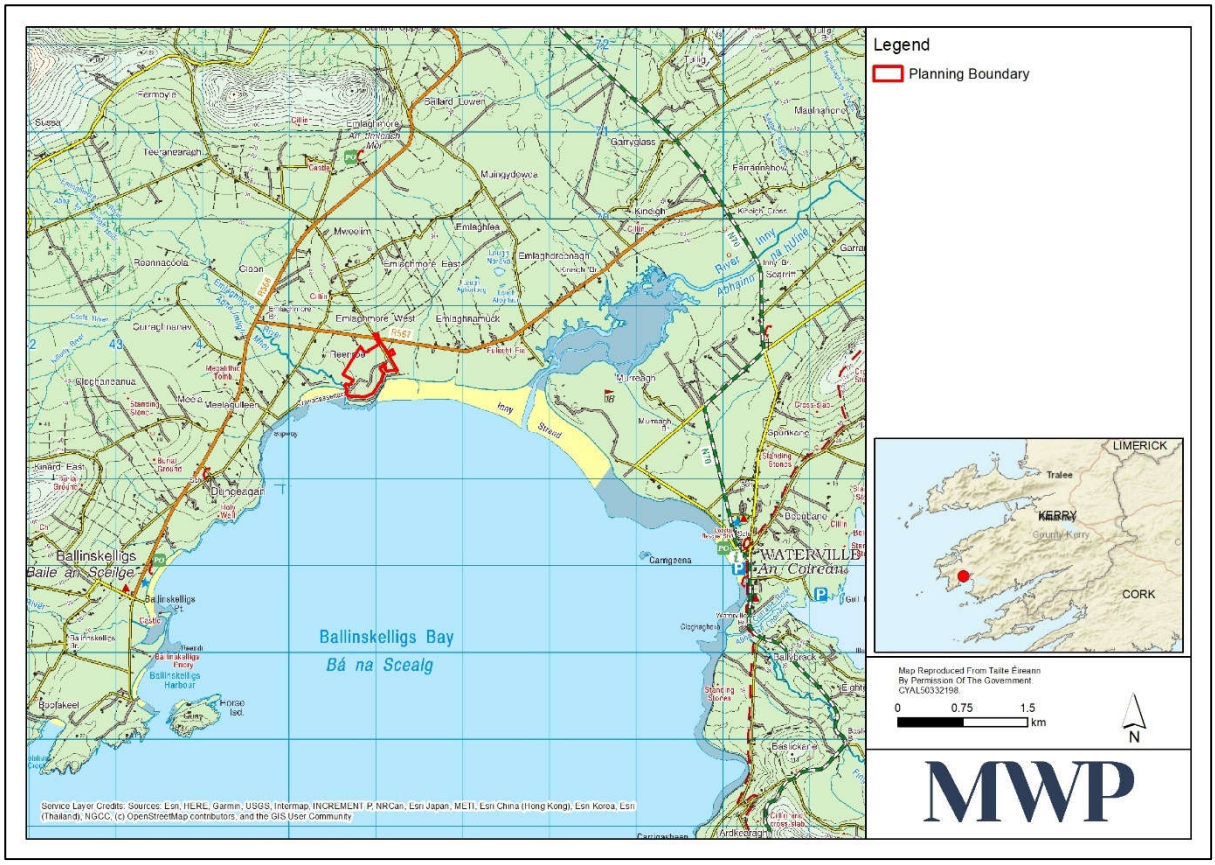

Figure 1: Site Location (County Scale)

2.2 Overview

Permission is being sought to renovate the existing derelict beach hotel at Reenroe (**Figure 3**) to develop the following facilities in the Hotel building:

- 4 no. self-catering Studio apartments (41.5m^2)
- 3 no. accessible one bedroom self-catering apartments (46.5m^2)
- 15 no. two beds self-catering apartments (ranging from 66.5m^2 and 77.9m^2),
- A bar and café area (181.2m^2)
- An adjacent and inter-connected multi-purpose space (87.6m^2),

- Dining Room (251m^2)
- Outside terrace off dining area (with sea view)
- Kitchen (131.7m^2)
- Kitchen, Bar and Staff storage and facilities area (321m^2)
- Lounge (165m^2)
- Shop -groceries and sundries (74m^2)
- Meeting Room (36.8m^2)
- Toilets (67.9m^2)
- Rooftop restaurant and bar (and associated facilities) (574m^2)
- Elevator and stairwell
- Plant Room (43m^2)
- ESB Substation, switch and standby generator rooms (29.5m^2)
- Delivery yard with goods-in area and bin store (12.4m x 16.7m)

The extensions to the existing hotel will amount to a total of 798,5m^2 on all four floors. This includes the rooftop restaurant, the external fire exit staircase, balconies, entrance foyers, new staff toilet and wash facilities, and the new ESB substation, control/switch room and backup generator room in the hotel delivery yard.

The rest of the proposed Leisure Park will include the construction of:

- 6 no. Hobbit Huts,
- 21 no. Glamping Pods,
- 25 no. Holiday Homes,
- 144 no. Mobile Homes,
- 20 no. Campervan Stands,
- 0.8ha Tent Camping Area,
- Washroom and toilet facilities for campers (58m^2),
- Maintenance Building (618 m^2)
- Leisure Complex (with swimming pool) adjoining the Hotel building (1339.5 m^2)
- Surf School (191.7m^2) and Café (126.5m^2) adjacent to the beach and its access road (with 7 parking spaces and 1 accessible parking space),
- Natural Play Area,
- Central Park (Green) Area with:
    - walkways,
    - 142 no. Car Parking Spaces,
    - 7 access parking spaces,
    - 2 coach parking bays,
    - 40 no. bicycle spaces,
    - 7 no. Electric Vehicle (EV) charging points,
- Retention of an onsite derelict cottage for biodiversity use as bat roost,
- Internal roads (3475m long),
- footpaths,
- waste storage areas,
- widening of the Reenroe beach access road (L-7535) from the R567 to the beach to accommodate two-way traffic, and addition of a separate pedestrian walkway on the east side of the road (Note: existing beach parking spaces will be retained),

- new private access road to two existing neighbouring dwellings to the southwest of the development site,
- new wastewater treatment system with clear water pump station and UV system,
- 2 Standby Generators (at the Hotel and WWTP)
- drainage, water services and percolation area,
- landscaping (as per the proposed Landscape Management Plan),
- all associated ancillary site works, and
- Biodiversity Enhancement Area to the east of the Reenroe beach access road (L-7535).

The proposed Hotel and Leisure Park will occupy approximately 40% (22.6ha) of the 55.85ha of land owned by the developers (**see Figure 2**). The site layout is provided in **Figure 3**. The proposed development will be located on the west side of the Reenroe beach access road (L-7535). The only component of the project which will be located on the east side of the beach road is the Waste Water Treatment Plant (WWTP). It is proposed to engage in habitat management/enhancement for the purposes of biodiversity gain in the lands owned by the developer on the east side of the Reenroe beach access road (L-7535). There is an opportunity to expand the habitat management area subject to receiving planning permission for the proposal. This land is outside but adjoins the Ballinskelligs Bay and Inny Estuary SAC to the south and Proposed Natural Heritage Area. Screening for Appropriate Assessment (AA) has been undertaken to assess the potential impacts on the SAC.

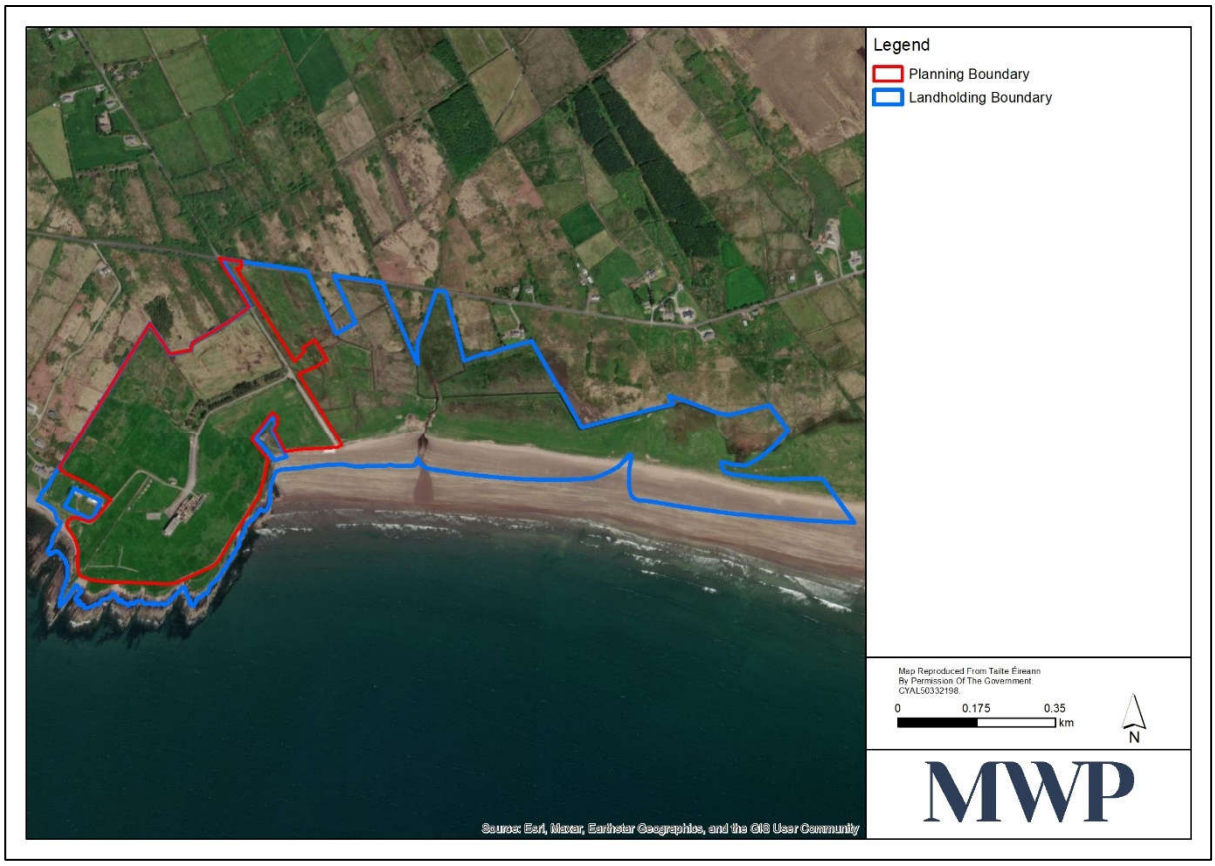

Figure 2: The Planning Application Area (Red) and Land owned by the Developer (blue line boundary)

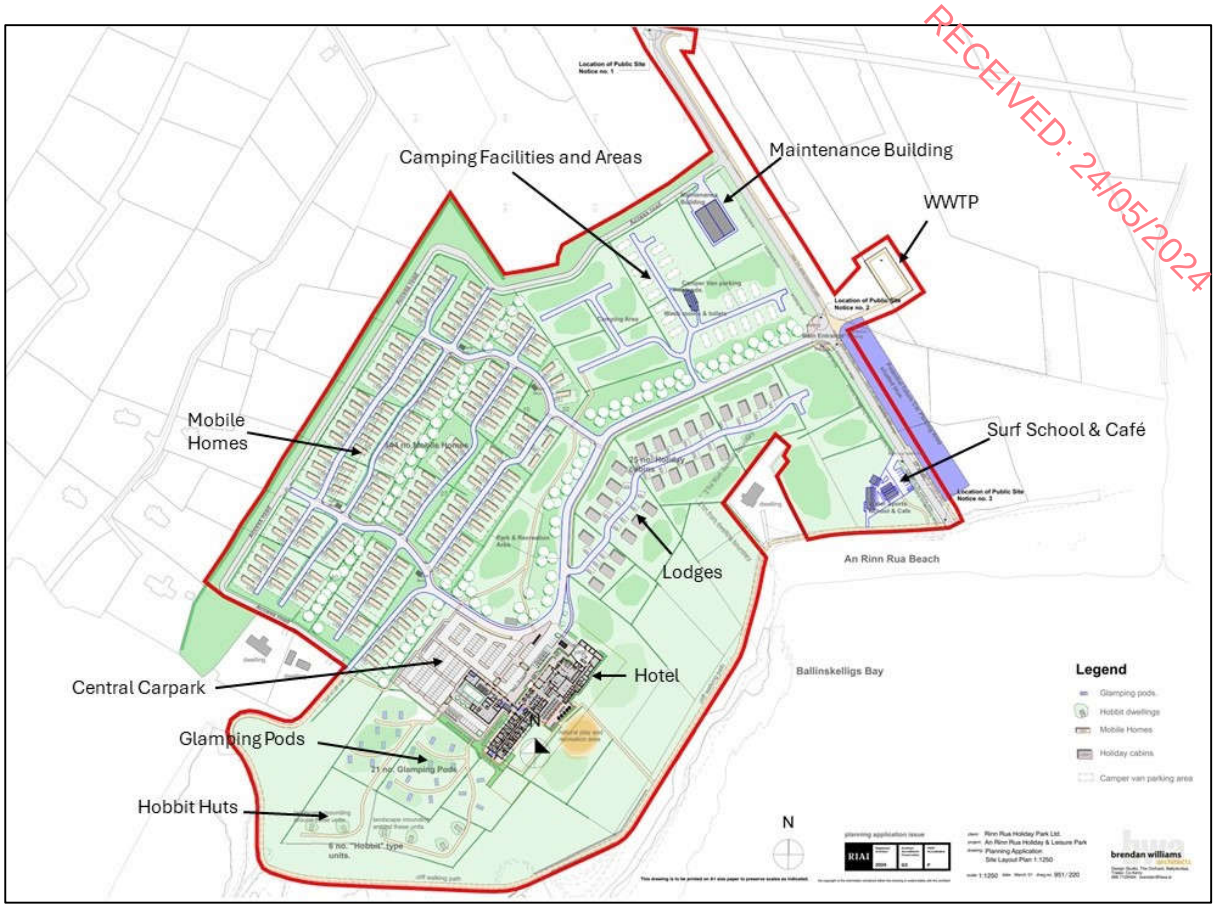

Figure 3: Proposed Site Layout

2.3 Construction Programme

Assuming planning permission is granted, it is hoped construction of the proposed development can being in January 2025. It is proposed to construct the development in a series of Phases over a period of 4.5 to 5 years. An indicative phasing based on the expected construction activities is indicated in **Table 2-3** below and in **Figure 2-28**. This phasing is designed to ensure efficiency in the development of the facilities and accommodate the developer's financing plan and constraints. The first Phase is expected to take 18 months to complete and will comprise: preparatory work and the installation of services including the main access roads, play area, walkways and carpark; water supply and drainage infrastructure; the waste-water treatment plant; as well as the refurbishment of hotel building; construction of the maintenance shed, landscaping and the installation of one third of the proposed (53 No.) mobile homes. During this phase it is expected that two mobile homes will be delivered to site overnight each week over 7 months. At the end of phase 1 the construction compound will be moved to the northern corner of the proposed development site where the maintenance building and camping facilities will be provided. Each phase of construction will be followed by a two month works stoppage in the July/August peak holiday periods.

Phase 2 is expected to be completed in 10 months and will see another third of the mobile homes (47 no.) being developed as well as the construction of half of the holiday lodges, all the glamping pods and the surf shop and café adjacent to the beach access road. Phase 3 will also be completed in 10 months. This phase will involve the installation of the balance of mobile home units (45 No.), the second half of the holiday lodges, the hobbit huts,

a central camper washroom and camper-van area. During the final 10-month phase in year 5, the construction of the Leisure Centre and the camping area is planned to be undertaken.

Table 1: Indictive Duration and Activities for each Construction Phase.

Phase #	Construction Activities	Duration
Phase 1	Initial site mobilisation and establishment of construction compound and access road. Access road for neighbours along northern boundary. Hoarding Underground services (water supply and discharge & electricity) WWTP and associated facilities. Landscaping and planting Internal roads and car park Walkways, fencing and gates Play area Hotel Refurbishment (including restaurant, pub, offices and shop) 53 mobile homes - first three rows closest to main entrance road 11 Holiday Lodges/Cabins (half) Maintenance Building. Relocation of Construction compound for Phase 2.	18 months beginning Jan 2025
July and August Stoppage		
Phase 2	47 Mobile Homes 14 Holiday Lodges/Cabins (half) 20 Glamping pods Beach Surf Shop & Cafe	10 months
July and August Stoppage		
Phase 3	45 Mobile Homes 6 Hobbit Huts Washroom Camper Parking	10 months
July and August Stoppage		
Phase 4	Camping sites Leisure Centre	10 months

3. Alternatives

The alternatives considered included the following are summarised in Error! Reference source not found..

Table 2: Alternatives Considered

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.
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.

Category of Alternatives	Summary
Road options and road/path surfaces,	Various road widening options were considered for the 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 in the Kerry County Development 2022-2028, and is 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 suitable for this proposed tourism development.

4. Population and Human Health

The scope of the assessment considers the effects of the construction and operation of the proposed project in terms of how it could affect population and settlement, economic activity, employment, land use, amenities and tourism, and health and safety.

4.1 Baseline Environment

The Waterville town (population 734, CSO 2016) approximately 4.6km to the east, is the closest and main urban centre relative to the site of the proposed project. The Project Area for the development is located in a rural, lightly populated area. Electoral divisions in the proposed development general locality are Emlagh, Ballinskelligs, Teeranearagh, Portmagee, and Saint Finan's. The land immediately adjacent to the proposed development comprises farmland, farmsteads and individual residential dwellings, half of which are holiday homes. There are three (3) residential dwellings in separate ownership immediately adjacent to the proposed development. One of these houses to the south-west of the site, is permanently occupied and the other two are holiday homes.

There are a number of recreational and cultural amenities in the vicinity of the site, and in the wider area, including the adjacent Reenroe beach and the Dungeagan (cliff) walk through the site. Further afield there are three golf courses, Ballinskelligs village, Waterville town, the Kildreelig Heritage site, Lough Currane and the Eightercura Stone Row.

4.2 Effects on Population and Human Health

Construction effects

As with any development, the construction activities can cause a nuisance to the local community and are likely to pose temporary minor disturbances locally. The potential nuisance construction effects relate to dust, noise and traffic. The noise and dust effects would only potentially affect neighbouring residents. However, most of these are sufficiently distant from the sources of noise (more than 45m) and dust to ensure that they are not significantly affected. In addition, the construction activities will mostly take place outside of the peak holiday periods and the majority of the immediately adjacent dwellings are holiday houses that are mostly used during the peak holiday periods and holiday weekends. There are however, two neighbouring dwellings that are permanently occupied. Without mitigation, one of these dwellings could experience a significant noise effect when the new private access road and services along the western and southern boundary of the property are being constructed. This effect could be mitigated through consultation with the occupiers and the implementation of the noise reduction measures proposed in the Noise Assessment chapter of the EIAR (Chapter 11).

The highest risk of dust effects will be during the first phase of construction over the summer period, when and if the weather is dry. Compliance with the proposed mitigation measures incorporated into the Construction Environmental Management Plan will minimize and effectively avoid this potential effect.

Traffic related noise and safety issues are also a concern particularly during phase one of construction (18 months). The construction phase traffic will not be significant and will mostly avoid the high peak holiday periods. Any safety or congestion issues can be effectively managed through the implementation of a Construction Traffic Management Plan.

Any potential negative visual effect on tourism in the locality due to construction activities is considered to be not significant and short term. While the construction works to the derelict hotel will be visible at a distance, the

isolated location of the site will ensure that much of the rest of the activity at ground level will be less visible to tourist traffic and will be screened. The proposed road upgrades to the beach access road will also be timed to avoid the peak holiday periods and ensure continued access to the beach.

With the proposed mitigation measures in place, no significant negative effects on the local population and human health are expected during the construction phase.

Operational effects

The sources of noise during the operation phase will derive from traffic, plant equipment used on site, and noise related to events and visitor activities within the hotel, leisure centre and site more generally. The noise assessment found that that the predicted noise levels from these sources during operation will be low and will comply with the noise limits set out in the EPA guidelines and thus will not adversely impact on the quality of life of existing local residents. Dust effects are not expected during the operational phase.

Traffic related noise, congestion and safety issues during the operational phase are considered low. The increase in traffic from visitors to the site is not expected to reach the capacity of the existing road network. The main site entrance is along the beach access road. The proposed widening and upgrades to this road will facilitate the additional flow of visitor traffic along that road. To reduce the need for these visitors to frequently access goods and services in nearby Waterville and Ballinskelligs, a shop, restaurant, and bar will be available on-site. This approach is designed to alleviate traffic-related pressures on the neighbouring communities.

Given the size of the proposed development, the prominence of the hotel in the landscape, the visually sensitive nature of the location, and the importance of tourism in the local economy, the potential visual effect was assessed. The restoration of the hotel will enhance the aesthetics of the site while the visual effect of the other accommodation facilities was assessed to not have a significant negative visual effect in terms of local population or existing key tourism and recreational facilities in the area.

The operational phase is expected to have a positive effect on tourism and economic activities. The proposed beach café and surf school, as well as the upgraded coastal walkway and addition of the leisure centre with a pool and gym, will provide new amenities in the locality for both tourists and the local population. The development project will have a positive direct and indirect employment and income generating effects at the local level. It is not likely that the proposed development would directly or indirectly result in any significant negative effect or reduction in existing economic activity of the area. All existing land-use practices can co-exist with the proposed development and does not pose a significant risk to either existing holiday homes or the other developments in the area.

There will be no severance, loss of rights of way or loss of amenities as a result of the proposed development. Serious risks to human health and safety are not envisioned. The rigorous safety checks imposed on during the design, construction, commissioning and operation ensures the risks to humans are negligible.

4.3 Mitigation

It is anticipated that any potentially negative population and human health effects would be either avoided (by design) or mitigated as part of the project. The mitigation measures proposed in the Noise, Air Quality/Climate and Traffic chapters of the EIAR will ensure that any adverse effects of human health and population are avoided or minimized to acceptable levels.

5. Biodiversity

The potential effects associated on biodiversity from the proposed Rínn Rua Hotel and Leisure Park development at Reenroe, County Kerry has been assessed. Ecological field surveys were completed in order to determine the baseline ecological characteristics of the Site and surrounds and identify potential ecological receptors of the Proposed Development. Targeted bird surveys were undertaken between May 2022 and June 2023. A suite of other ecological surveys (habitats, flora, mammals, bats, aquatic and invertebrate surveys) was undertaken between April 2023 and February 2024.

5.1 Baseline Environment

The site itself comprises coastal agricultural grassland overlooking Ballinskelligs Bay. A large derelict hotel, encompassed within the Site, is the dominant feature of the Site and local landscape. The Site does not contain particularly sensitive habitats taking account of publicly available information and the results of the surveys undertaken.

The most notable species recorded on-site comprised chough. During surveys, one pair of chough was recorded nesting in part of the derelict hotel in both 2022 and 2023. This pair was also recorded using the structure as a roosting site over the winter 2022/23 period. The pair of chough which occur on-site are considered to be of County Importance in the context of the local chough population. Low numbers of several species of wading bird (oystercatcher, golden plover, bar-tailed godwit, curlew and whimbrel) were recorded occasionally using the grassland habitats on-site; however, surveys have determined that the Site does not contain key populations of these species. The coastal and marine habitats within the wider environs of the Site are suitable for a wide variety of coastal and seabird species.

Also of note was a number of bat species (common pipistrelle, soprano pipistrelle and lesser horseshoe bat) recorded roosting in the derelict hotel during surveys. Two species of bat (common pipistrelle and *Myotis* sp.) were also recorded roosting within a derelict cottage located in the Site. Several species of bat were recorded using the Site for foraging.

The Site itself is not subject to any nature conservation designations; however, the boundary of the Ballinskelligs Bay and Inny Estuary Special Area of Conservation (SAC) adjoins parts of the Site boundary. This SAC is designated for the protection of two types of coastal habitat (saltmarsh) and one species of plant, none of which occur within or in the vicinity of the Site.

5.2 Assessment of Biodiversity Effects

Potential effects on biodiversity features were assessed within both an Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) context. There will be no direct impacts on designated sites such as SACs or Special Protection Areas (SPAs), which are designated for birds. The Screening for AA report concluded that there is no likelihood of significant effects on any SAC or SPA, in view of the sites' conservation objectives.

The Biodiversity assessment identified habitat loss and alteration, species disturbance/displacement and water quality as potential impacts during the construction phase, and habitat alteration, species disturbance/displacement and water quality as potential impacts during the operational phase. Unmitigated effects from construction activities (loss of a breeding site) were assessed as potentially significant for chough. Unmitigated effects from operational activities (increase in use of artificial lighting) were assessed as potentially significant for bats. No other potentially significant effects were identified in the Biodiversity assessment. The cumulative impact of the development was also assessed. No significant effects on biodiversity features are

predicted with regard to potential cumulative impacts from the development and other plans, projects or activities.

5.3 Mitigation

It is anticipated that any potentially adverse effects may be either avoided (by design) or mitigated as part of the project. Alternative breeding and roosting habitat for chough is proposed to mitigate for loss of chough breeding/roosting habitat within the Site. Alternative roosting habitat for bats is proposed to mitigate for loss of bat roosts within the hotel. Mitigation is proposed regarding bats and lighting, in particular during the operational phase. All construction activities will be conducted in accordance with a Construction Environmental Management Plan (CEMP). With the avoidance measures (design phase), and full implementation of mitigation measures throughout the construction and operational phases of the project, significant residual effects on biodiversity are not expected.

6. Land and Soils

6.1 Introduction

This chapter considers the potential effects on the existing land and soils environment arising from the Proposed Development. Land and soils are considered both in geological terms and with reference to current, historical and planned land use. The proposal will involve restoration of the existing derelict hotel and expansion of the visitor offering to include mobile homes, holiday lodges, touring caravan pitches, and glamping pods along with sensitive landscaping of the entire development area.

6.2 Baseline Environment

The proposed development site is presently occupied by two derelict structures, namely a former hotel and a former dwelling house.

Overall, the site and surrounding area slopes upward from the bay in the south to north to a maximum elevation of 12.0 m above ordnance datum (AOD) found adjacent to the R567 road.

The bedrock geology of the site area is predominantly composed of Ballinskelligs Sandstone Formation, purple sandstone & siltstone.

The main soil types of the site are “Peaty poorly drained mineral (Mainly acidic) soil” “Mineral poorly drained (Mainly acidic)” and “Blanket peat”. The Quaternary Sediments at the site include “Till derived from Devonian sandstones”, “Blanket Peat” and “Marine beach sand”. There are no Geological Heritage Sites within the site. There are no quarries operating in proximity to the proposed development site. There is a known non-metallic quartz mineral locality within the proposed area of development. The proposed development is unlikely to have any impact on this mineral location is it is a historic record with minor economic potential.

There are no recorded landslide events at the proposed development site and the landslide susceptibility classification for the site is ‘Low’ for the site.

Access to the site is via a local road off the R567 Waterville to Ballinskelligs Coast Road, and from there via a private driveway through the site as far as the hotel building.

6.3 Summary of Effects

The predicted pre-mitigation effects on lands and soils for the proposed development are summarized in Table 6-1.

Table 3: Predicted pre-mitigation effects on lands and soils for the proposed development

Effect	Receptor	Quality of Effect	Significance	Spatial Extent	Duration	Other Relevant Criteria	Likelihood
Construction: Change of Land Use and Loss of Soil Potential/Soil Sealing	Land, soils, geology	Adverse	Moderate	Localised	Long-term	Direct, Cumulative	Likely
Construction Effects on Soil and Geology	Soils	Negative	Moderate	Localised	Short-term	Direct	Likely
	Geology	Negative	Imperceptible	Localised	Short-term	Indirect	Unlikely
Construction Effects: Contamination/Pollution	Land, Soil	Negative	Significant	Localised	Short term	Indeterminable 'Worst-case'	Likely
	Geology, Groundwater	Negative	Significant	Localised	Short term	Indirect, Cumulative	Likely
Operational Phase Effects	Land and Soil	Negative	Not Significant	Localised	Permanent	Irreversible	Likely

The majority of the effects will occur during the construction phase which involves excavations and movement of soil and may result in soil erosion, compaction, slippage and contamination/pollution. Following the construction stage, the proposed development will enter the operational stage once the facility is in use. The potential effects on the land and soils of the site due to excavations will be lower during operation and maintenance, as the majority of excavations will have been reinstated.

6.4 Mitigation Measures

Mitigation measures are proposed to address any potential effects to ensure there are no significant negative environmental effects on the soils and geological environment as a result of the construction or operation of the proposed development.

Materials used during the construction phase of the proposed development and minimum site management controls to prevent compaction, slippage or contamination/pollution will be managed in line with the approved CEMP which can be found in Appendix 2-1 in Volume 3 of the EIAR. The risks associated with sedimentation and contamination due to erosion and runoff during the operational phase will be mitigated to minimal levels as areas are re-vegetated in line with the Landscape Management Plan and construction traffic ceases.

6.5 Residual Effects

No significant residual negative effects will occur on the land and soils environment as a result of the proposed development.

7. Water

7.1 Introduction

This chapter considers the potential effects on the existing water environment arising from the Proposed Development. The methodology used for this study included desk-based research of published information to assemble information on the local receiving environment. The methodology and approach outlined in the EPA Guidelines was used to determine whether the proposed development had the potential to cause significant effects on the water environment.

The waste water from the facility will be treated at a new on-site tertiary waste-water treatment plant (WWTP) to be built by the developer. The expected maximum foul discharge from this facility is 144 400 litres per day. The level of treatment will be to a minimum of 3:10 BOD:TSS with 99.9% removal of faecal coliforms, with pathogenic bacteria absent. This level of treatment will ensure that discharges from the WWTP will meet Ground Water and Surface Water Regulations as amended and prevent contamination being released to the water environment.

The stormwater will exit the site via existing drainage network however it will go through a Petrol Interceptor prior to discharge to two interceptors. In addition to this, the site drainage design for the development has been carried out in accordance with SuDs requirements.

Further detail on the proposed waste water and stormwater drainage for the proposed development are provided in **Roads, Water, Waste Water, Storm Water and Flood Risk Assessment Report** submitted as part of the planning application.

7.2 Baseline Environment

The proposal will involve restoration of the existing derelict hotel and expansion of the visitor offering to include holiday lodges, mobile homes, touring caravan pitches, and glamping pods along with sensitive landscaping of the entire development area. The development proposal will also include visitor services including a shop, bar, restaurant, reception area, Leisure Centre, and measures to enhance local amenity including improvements to Reenroe beach access and parking. A habitat enhancement area is also proposed on the lands to the east of the site boundary which are also in the ownership of the applicant.

The proposed development site is located within the 'South-Western' River Basin District and the Dunmanus-Bantry-Kenmare Catchment.

The river waterbody Emelaghmore 21 is located approximately 50 m to the west of the site boundary. The river waterbody AN_RINN_RUA is located approximately 185 m to the east of the proposed development site boundary. The coastal waterbody Ballinskelligs Bay (IE_SW_200_0000) is located directly west, south and east of the proposed site boundary.

There are no records of groundwater wells and springs within the site boundary. There are no groundwater monitoring and abstraction wells within the site locality.

The Groundwater Body underlying the site is the Beara Sneem Groundwater Body. There is one bedrock aquifer underlying the site, a Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones. The majority of the proposed site is underlain by an aquifer of 'high vulnerability'. There are no Group Scheme and Public Supply Source Protection Areas or Ground Water Scheme Abstraction Points Located on or adjacent to the proposed development site.

The proposed development is located at a local high point of the headland and all runoff thus flows away from this area as present to the sea and inland to ditches which in turn discharge local streams to the sea. There are no problems of flooding on the proposed development site at present.

7.3 Summary of Effects

The predicted pre-mitigation effects on the water environment for the proposed development are summarized in **Table 7-1.**

Table 4: Predicted pre-mitigation effects on the water environment for the proposed development

	Quality of Effect	Significance	Spatial Extent	Duration	Other Relevant Criteria	Likelihood
Construction Effect 1: Excavations on Hydrogeology and Hydrology	Negative	Not significant	Localised	Short- term	Indirect Irreversible	Likely
Construction Effect 2: Fuel and oil spillage on Hydrogeology	Negative	Slight	Localised	Short- term	Indirect	Unlikely
Construction Effect 2: Fuel and oil spillage on Hydrology	Negative	Not significant	Localised	Short- term	Indirect Irreversible	Unlikely

Without mitigation, it is considered likely that there will be a negative not significant short-term effect on hydrogeology and a negative not significant short-term effect on hydrology as a result of excavations during construction.

Without mitigation, it is considered unlikely that there will be a negative slight short-term effect on hydrogeology and a negative not significant short-term effect on hydrology as a result of fuel and oil spillages during construction.

7.4 Mitigation Measures

Proposed mitigation measures for the development are outlined in the following sections. The mitigation and control measures are also detailed in the **CEMP (Appendix 2-1)** in **Volume 3** of the **EIAR.**

An Operation and Maintenance Plan will be prepared and implemented by an appointed WWTP operator to ensure the WWTP is operated and maintained according to the manufacturer's instructions.

The WWTP and associated infrastructure will include additional storage capacity and a back-up power supply for the pumps. An Emergency Action Plan will be prepared and implemented by the WWTP operator prior to commissioning of the proposed development.

Best practice control measures will be implemented for drainage, sediment control and storage and stockpiles, during the construction phase. A temporary construction compound will be established for the construction stage and will be maintained in accordance with best practice.

7.5 Residual Effects

No significant residual negative effects will occur on the water environment as a result of the proposed development.

8. Material Assets

This assessment identifies Material Assets within the vicinity of proposed holiday park or will be utilised by the development. Material asset assessed include electrical infrastructure, aviation, telecommunications, gas, water and wastewater infrastructure and waste management.

8.1 Electrical Infrastructure

All works in the vicinity of ESB Networks infrastructure will be carried out in ongoing consultation with ESB networks and will be in compliance with any requirements or guidelines they may have including procedures to ensure safe working practices are implemented when working near live overhead/underground electrical lines.

Where new services are required, the Contractor will apply to ESB Networks for a connection permit where appropriate and will adhere to their requirements. Cables will be laid underground to avoid effects on roadside hedgerows and disturbance to nesting birds.

During Construction effects on electrical infrastructure are negative, not significant, localised, short-term and likely. During operation, there will be no effects on electrical infrastructure.

8.2 Gas

The natural gas network in Ireland is run by Gas Networks Ireland. Following consultation with Gas Networks Ireland Dial Before You Dig (DBYD), there are no identified gas network utilities within the proposed development site boundary or surrounding areas. There are no effects on gas networks in the area during construction or operation.

8.3 Telecommunications

In the event of interference to television and telecommunication services arising from the proposed development, the applicant will work with telecommunication providers to remedy any issues of interference to affected communication links. Appropriate mitigation measures can be implemented such that there will either be an imperceptible effect, or no effect, on surrounding reception as a result of the proposed development. There will be wifi throughout the hotel (including bedrooms). The apartments will also have a broadband connection in each living room with a phone. Given that new telecoms infrastructure will be provided, there are no negative effects expected on the surrounding network during the operational phase of the proposed development.

During Construction effects on telecommunications are identified as negative, imperceptible, brief periods over short-term. During operation, effects will be neutral to imperceptible.

8.4 Aviation

The project site is also outside of any aeronautical restricted area. Given that the hotel already exists on the site and will not be increased in height, and all the other structures will be single story structures, there is no new risk of obstructions to aviation traffic. There will be no effects on aviation during operation.

8.5 Water and Wastewater Infrastructure

Consultation with Irish Water/Uisce Éireann has indicated that there is an existing watermains within the footprint of the proposed development, which will need to be replaced and enlarged. During operation effects on the water supply are negative, not significant, localised, short-term, indirect and unlikely.

Foul water discharge during operation are neutral, imperceptible, localised, short-term and likely.

The proposed storm drainage system has been designed taking on board the principles of Sustainable Drainage Systems (SuDS). SuDs endeavours to slow down runoff from developed sites, the ideal SuDS system will mimic existing green field runoff in terms to volume, rate of runoff and quality of the runoff. The effects of stormwater discharge during operation are neutral, imperceptible, localised, short-term and likely.

8.6 Waste Management

Construction phase waste will be stored in the construction compound and collected at the end of the construction phase and taken off site to be reused, recycled and disposed of in accordance with best practice procedures at an approved facility. All waste to be removed from site will be undertaken by authorised waste contractors and transported to an authorised facility in accordance with best practice. During operation waste management effects will be neutral, imperceptible, localised, short-term and likely.

9. Cultural Heritage

The potential impacts of the Proposed Development on the archaeological, architectural and cultural heritage were assessed using desktop research and field surveys. There are no National Monuments in State Care, Recorded Monuments. NIAH structures (including Recorded Protected Structures within limits of the Proposed Development thus there will be no direct impacts on any. No previously unrecorded sites, features of archaeological or cultural heritage importance were noted within the PDS during field survey. Although, there is a potential of direct impact on unknown sub-surface archaeological features / artefacts or sub-surface vernacular structures during topsoil / peat stripping. Where potential impacts are possible appropriate mitigation measures have been recommended in order to minimise any such impacts. Recommended mitigation includes pre-development test excavations and archaeological monitoring during the construction phase of the project. Indirect (visual) effects on the National Monuments, Recorded Monuments and RPS/NIAH within 5km study area were also assessed. No significant visual effects on the recorded archaeological, architectural or cultural heritage resource were identified.

10. Landscape and Visual Effects

10.1 Landscape Impacts & Effects

The sites enhancement values (as set out in **Section 10.4.2.2 of the EIAR Volume 2**) reflect a body of policy that is supportive of the type of development – tourism and accommodation – in this general area. The site itself and environs has a history of commercial / tourism use and is unfortunately dominated by the now derelict and prominent existing grey hotel building, imparting a neglected character not just to the site but to the wider area. Additionally, there are opportunities to enhance recreational amenity, the cliff walk and beach through appropriate site enhancement.

The site's conservation values (as set out in **Section 10.4.2.2 of the EIAR Volume 2**) predominantly reflect the sensitivity and distinctiveness of the environs with protected views and prospects, and a High landscape sensitivity. The landscape quality reflects the adjacent Inny Strand, local cliffs and cliff walk, hedgerows and drystone walls, and designated areas of protection (Natura 2000 and NHAs), as well as the panoramic coastal setting - typical of this part of southwest Kerry.

Overall, the impact of the proposed development is the change of the site from its current neglected wet grassland with a prominent derelict building to a new tourism facility with modern hotel similar in scale to the existing structure, additional accommodations in low rise mobile homes, lodges, glamping pods and hobbit huts, and a leisure centre, surf school and café, all set in a new landscape structure of mixed hedgerows and tree planting. Whilst the extent of the development is large the low-rise nature of much of it will quickly integrate in the landscape as the new planting matures. The new hotel will be prominent but an attractive replacement to the existing neglected building, its off-white colour reflecting traditional building finishes.

Construction Phase Landscape Effects:

Given the sensitivity of the environment and the extent of the development, the significance is regarded as **Moderate-Significant**, with the more significant effects occurring in the higher sensitivity areas e.g. the Cliff Walk and Wet grassland areas. However, the duration is **temporary to Short-term.** Qualitatively this change would be **Adverse**.

Operational Phase Landscape Effects:

The significance of landscape effect varies in the operational phase throughout the site. The hotel and its immediate vicinity, including leisure centre and car parking area, result in a **Moderate and Neutral to Beneficial** landscape effect resulting from the restoration of derelict buildings, the introduction of the new leisure centre and car parking area.

For the remainder of the site there will be some Short-term Adverse landscape effects arising from the introduction of the mobile homes, glamping pods and lodges which will be visible across significant areas. These effects will be mitigated, however, in the medium to long term as the proposed hedgerow infrastructure matures to screen the units and integrate them into the site and wider sensitive landscape setting. **Significant Short-term Adverse** landscape effects will, thus, change to **Neutral** landscape effects in the medium to long term.

Other site-specific landscape effects relate to the inevitable removal of wetland/wet grass habitat as the use of the site changes which is assessed in chapter 5 of the EIAR.

The existing cliff walk path is currently in poor condition and is to be upgraded with a bitumen macadam surface finish which will result in a localised landscape change of **Negligible** significance, with a **Neutral** landscape effect.

Overall, any short term adverse effects will become **Neutral** and the new hotel will be a **beneficial** change to the landscape character.

10.2 Visual Impacts and Effects

Construction Phase:

Construction phase visual effects range from **Not Significant to Significant** and are generally **Adverse** due to the nature of Construction works. However, these changes are also **Temporary or Short Term** in nature, quickly giving way to a restored landscape and even beneficial effects in the Operational Phase.

Operational Phase:

Visual effects in the Operational Phase range from **Not Significant (more distant views) to Significant**. The Significant or Moderate-Significant views are closer to the site where the change is the greatest, however it is noted that the majority of the proposed views are considered to be neutral in quality while two of them are beneficial in quality.

For views 2, 4, 5 and 6 there are some **short term adverse effect**s recorded in respect of the proposed mobile homes and lodges which will be visible from these locations and occupy a large area. These effects will be mitigated in the medium to long term as hedgerow planting across the site matures to screen the units and integrate them in the landscape setting.

The restored hotel and new leisure centre will be the most prominent element of the development in the short, medium and long term by virtue of their prominent location and light colour finishes in elevations. In relatively close up views 4, 5 and 6, the transition of the existing derelict hotel structure to its restored condition, along with the leisure centre, is recorded as a **beneficial** effect where the design qualities of buildings are clearly evident.

In middle distance view 2 the visual effects of the hotel / leisure centre facility are recorded **neutral** somewhat as detail recedes due to distance.

In long distance views 7, 8 and 9, the hotel and leisure centre are also the only visible elements of the proposed development by virtue of the light colour finishes. Distance, however, has a significant diminishing effect in these view such that the facility appears as a distant reference point not too dissimilar to dwellings which appear in the wider coastal landscape.

Cumulative Impacts

The proposals represent an intensification of tourism activity and facilities, accommodation and services in the area, smaller in scale than the proposed development. These changes are in keeping with policy and are not perceived or experienced cumulatively in the landscape. The cumulative effect is regarded as **Negligible and Neutral.**

11. Noise and Vibration Effects

The potential noise and vibration effect of the proposed development on the receiving environment has been assessed. The study area comprised of the proposed development site and its immediate environs. Noise sensitive receptors that could potentially be affected by noise and vibrations as a result of the proposed development were identified. The potential noise emissions associated with the construction and operation phases has been considered. The noise assessment consisted of the following activities:

- An environmental noise survey has been undertaken at the proposed development site to characterise the existing baseline noise environment .
- A review of the most applicable standards and guidelines has been conducted to set a range of acceptable noise and vibration criteria for the construction and operational phases of the proposed development.
- Predicted noise levels have been assessed against relevant noise limit criteria for both the operational and construction phases at the nearest sensitive receptors.
- Where necessary mitigation measures to reduce noise and vibration effects are described .

11.1 Existing Environment

A baseline 24 hour unattended environmental noise survey was conducted at a site adjacent to the derelict hotel between 16th June and 26th June 2023 to determine the existing noise soundscape. The survey data represents the baseline noise levels at the closest noise sensitive receptors NSR1 to NSR12, refer to **Figure 4**. The main existing sources of noise at the location are onshore wind as well as noise of waves crashing on the nearby coastline. There is also intermittent traffic noise from the access road to Reenroe Beach as well as faint noise from intermittent traffic at distant local roads in the wider area.

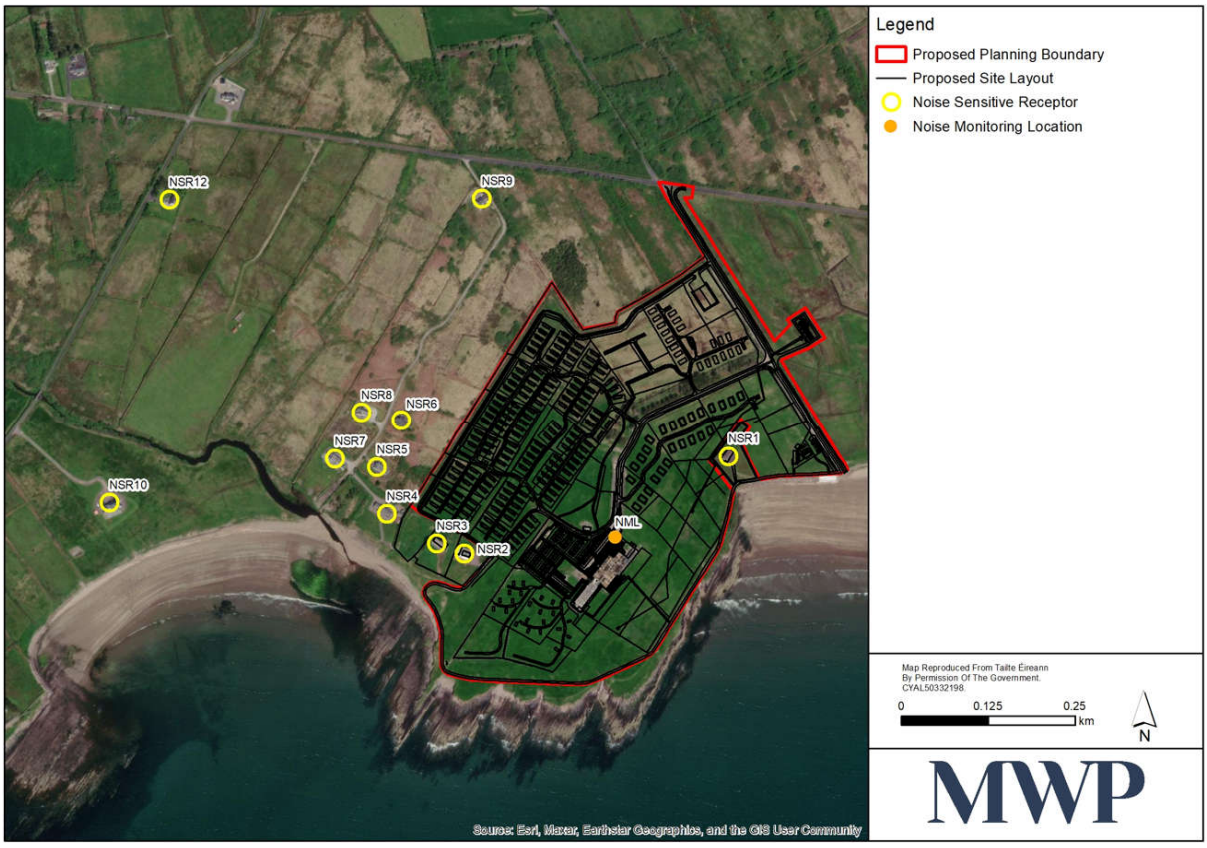

Figure 4: Closest Noise Receptors

11.2 Construction Phase Noise Effects

The main construction works will be located around the main hotel building construction areas located well over 45m from the nearest residential properties in the vicinity of the proposed development.

Construction works will mostly take place outside the holiday peak seasons. NSR 1, NSR2 and NSR 4 are holiday homes, and therefore they are unlikely to be affected by construction noise. NSR3 is the only permanently occupied receptor within 45m of the site boundary. The appointed contractor will liaise with all residential owners to ensure that works are carried out at suitable times to minimise any nuisance effects.

With mitigation in place, the associated construction phase noise effects within 45 metres are **likely** to be **negative**, **not significant, temporary to short-term, local**, and **direct** depending on the timing, location and phase of the construction works.

Beyond 45 meters, the effects from construction noise are likely to be **neutral, imperceptible, temporary to short-term, local**, and **direct, in the absence of mitigation.**

In terms of traffic related construction noise, the proposed construction works would increase AADT volumes by up to 82 vehicles, including five heavy vehicles on the R567, during construction Phase 1; and by up 44 vehicles, including four heavy vehicles, during construction Phases 2, 3 and 4. This would equate to AADT increases of up to 8.2% and 4.4%, respectively. In order to increase traffic noise levels by 1 dB, traffic volumes would need to increase by the order of 25%. In a worst case, construction traffic scenario, with 100% of all construction traffic either north or south of its R567 junction, the highest increase in AADT volumes on the N70 would be up to 3.5% and 1.9%, respectively, during the peak construction Phase 1 and Phase 2, 3 and 4. Taking the above traffic increases into account, there is 0 dB increase on existing traffic noise levels predicted during the construction phases of the proposed development. Consequently, the noise from construction traffic noise will **likely** result in a **neutral, imperceptible, temporary to short-term**, **local** and **direct** residual effect on sensitive receptors.

There will be no significant effects from vibration during the construction phase of the proposed development.

11.3 Operational Phase Noise Effects

The buildings of the proposed development will have sufficient insulation so that there is no significant inward noise to accommodation. Consequently, during the operation phase of the proposed development, inward noise will **likely** cause a **neutral, imperceptible, local, long-term,** and **direct** residual effect on the hotel residents and self-catering accommodation residents.

The main sources of noise directly from the built proposed development facilities, during the operational phase will consist of the following:

- Deliveries – these will be small in size and number and are not expected to be nuisance.
- Amplified music within the hotel buildings that is not expected to be significant at external receptors including residential receptors and visitors to the Reenroe beach.
- Waste Management and collection activities – which are similar to those arising throughout residential areas across surrounding area.
- Patrons - both adults and children congregating in outside areas in vicinity of accommodation facilities. This will be managed to ensure that patrons do not give rise to external nuisance to neighbouring receptors.
- Vocalisations at the leisure complex from children and adults at the swimming pool, gym etc. All such emissions will arise internally only and will not be audible beyond the building envelope.

- Mechanical plant serving the WWTP and other operations of the proposed development. These will be controlled in accordance with BS 4142 such that the existing noise environment is not increased.

From the foregoing, it is evident that emissions from the facility's noise sources will be relatively low and will not give rise to significant offsite impacts. Modelling of noise emissions is not required, as no emissions of significance, will arise onsite. With mitigation in place, the effects from the proposed development facilities noise sources is likely to cause **neutral**, **imperceptible**, **long term**, **local**, and **direct** effects to noise sensitive receptors.

During the operational phase, there will be increased traffic levels on surrounding roads. The Access Road (Site & Reenroe Beach) will experience the largest increase (116%) in traffic. The resultant increase worst case equates to 4 to 5 dB and will result in a **slight to moderate, local, long term**, **local** and **direct** effect of sensitive receptors. The R567 East @ N70 will experience a 1 dB increase which is considered not significant and predicted increase with traffic at the remaining road links is expected to be less than 25% and therefore there will be less than 1 dB increase and the noise effects are considered imperceptible.

11.4 Proposed Mitigation Measures

Best practice mitigation techniques as specified in BS 5228:2009+A1 2014 – Noise and Vibration Control on Construction and Open Sites shall be implemented during the construction phase. Contractors will be familiar with the measures in this document.

During the operational phase of the proposed development, plant items with appropriate noise ratings and, where necessary, appropriately selected remedial measures (e.g. enclosures, silencers etc.) will be specified in order that the adopted plant noise criteria is achieved at the facades of sensitive properties, including those within the development itself.

A general noise management strategy should be developed as part of the development, including hours of operation, training for staff and signage to notify the public of the potential effect their activities, particularly at night may have on nearby residents.

12. Traffic and Transportation Effects

The Traffic and Transportation impacts of the proposed development have been assessed on the basis of the expected future traffic growth. A summary of effects is provided in Error! Reference source not found..

There will be no significant adverse construction traffic impacts. Other than during the initial construction phase, when the proposed development will not be operational, construction traffic volumes will only occur during the off-peak traffic season, as there will be no construction works during the peak summer tourist and holiday season in July and August.

The proposed development includes the widening and upgrading of the existing beach access road, including a shared pedestrian and cycle facility, realigned junction tie-in at its R567 junction, and provision for Rural Link public transport.

The proposed development will be fully sustained by the proposed and existing roads and transport infrastructure and facilities, including by Kerry County Council. The existing road junctions and link roads will continue to operate within capacity with the proposed ultimate development fully operational.

Table 5: Traffic Effects Ratings

Phase	Quality of Effect	Significance	Spatial Extent	Duration	Other Relevant Criteria	Likelihood
Construction	Negative	Slight to Moderate	Localised	Temporary to Short Term	Direct	Likely
Operation	Negative	Slight to Moderate	Localised	Long Term to Permanent	Direct	Likely

13. Air Quality and Climate Change Effects

The air quality assessment involved a review of available published data, and review of applicable guidelines to set appropriate criteria to assess significance of effects air quality. Air quality data from the EPA was reviewed to get a representative air quality baseline for the proposed development area and sensitive receptors.

The existing air quality along the proposed development is below the National and European Union air quality standards.

During the construction phase there will be emissions from vehicle exhausts. The movement of machinery, construction vehicles and the use of generators during the construction phase will generate exhaust fumes containing predominantly carbon dioxide (CO2), sulphur dioxide (SO2), nitrogen oxides (NOx), carbon monoxide (CO), and particulate matter (PM10). Emissions from construction traffic are predicted not to increase baseline levels significantly and therefore air quality at the proposed development will stay well below the National and European Union air quality standards.

As the proposed development is in close proximity to natura sites, Ballinskelligs Bay and Inny Esturary SAC and Ballinskelligs Bay and Inny Estuary pNHA, an assessment of the impact of NOx (NO and NO_2) emissions resulting from the traffic associated with the proposed development has been undertaken. The predicted level of NOx from traffic was found to be well below critical level at the designated sites.

Dust generated from moving and transporting soil and materials in and around the construction site and on public roads. Weather conditions will play an important role in the quantity of dust generated. The potential for fugitive dust emissions is greatest during periods of prolonged dry weather. Appropriate mitigation measures to ensure that construction dust nuisance is minimised will be implemented for the duration of the construction phase.

There will no mitigation measures required during the operational phase of the proposed development to reduce the effects on air quality as the proposed development is expected to have an imperceptible effect on ambient air quality, during the operational phase, in the absence of mitigation.

The climate assessment involved a review of greenhouse gas emissions, a review of applicable guidelines and predictive calculations to assess climate impacts. The proposed development was also assessed in terms of its vulnerability to climate change.

In terms of GHG emissions, the construction phase is not predicted to produce significant GHG emissions over the temporary to short-term phase of the proposed development.

During the operational phase of the proposed development, there will be a notable change in traffic which will increase GHG emissions over a long term period. A detailed assessment of GHG emissions associated with the road link experiencing the largest increase in traffic (Reenroe Beach Access Road) was carried out. The predicted

concentrations of CO2, as a result of increased traffic, for the future years are significantly less than the 2030 targets set out under EU legislation. It is predicted that in 2026 the proposed development will increase emissions by 0.005% of the EU 2030 target and in 2031/2041, the proposed development will increase emissions by 0.015% of the EU 2030 target. Therefore, during the operational phase, the increase in GHG emissions are predicted to imperceptible.

14. Interaction of Foregoing

The summary of the various interactions is summarised in Error! Reference source not found..

Table 6: Matrix of Interactions

	Population and Human Health	Traffic and Transport	Biodiversity	Water	Land and Soils	Air and Climate	Noise and Vibration	Landscape and Visual	Cultural Heritage	Material Assets
Population and Human Health		C/O	C/O	C/O	C	C/O	C/O	C/O		O
Traffic and Transport	C/O		C/O		C	C/O	C/O			C
Biodiversity	C/O	C/O		C/O	C		C/O			
Water	C/O		C/O		C					
Land and Soils	C	C	C	C/O		C			C	
Air and Climate	C/O	C/O			C					
Noise and Vibration	C/O	C/O	C/O							
Landscape and Visual	C/O								O	
Cultural Heritage					C			O		
Material Assets	O	C								

	Interaction
	No Interaction

C	Construction Phase Effect
O	Operation Phase Effect