An Coimisiún Pleanála
64 Marlborough Street
Dublin 1, D01 V902

Brendan Lynch
Barrystown
Wellingtonbridge
County Wexford.

13th August 2025

Case Reference: SU26.322985
Clonmines, Wellingtonbridge, Co. Wexford – camping/camp site enterprise.

Dear An Coimisiún Pleanála,

I am writing to you in relation to this unauthorized, privately run camping/campsite business which is located within/adjacent to the Bannow Bay Special Protection Area (SPA) IE0004033 and Special Area of Conservation (SAC) IE0000697.

The applicant has been operating this business without any regard to proper planning and has failed to comply with an enforcement order from Wexford county council (ref: PE0160/2020)). The business is located in a coastal and scenic position in a quiet, rural area.

The owner of this unauthorised campsite business has ignored the enforcement order taken by Wexford County Council and has, in fact, significantly expanded the scale of the business since the enforcement order was served.

For evidence of this, please note the following exhibits in the appendix to this letter:

- **Exhibit 1**: Google maps image outlining expansion of the works on site that should require planning permission despite an enforcement order being in place.
- **Exhibit 2**: Deep cutting in the shale to create another campervan parking area directly onto the foreshore (despite the enforcement order).
- **Exhibit 3**: Google maps image outlining expansion of the campsite footprint into both northern and southern agricultural fields.
- **Exhibit 4:** Google maps image showing new hard paving areas developed during 2025 (despite the enforcement order).
- **Exhibit 5**: Image of the expanded area to the North of the site into another adjacent piece of agricultural land
- **Exhibit 6:** Image of the expanded area to the south of the site into another adjacent piece of agricultural land.

As part of this correspondence, I would like to highlight the great work of a genuine local community/tourism initiative. This relates to Bannow Historical Society and can be evidenced via planning application 20201083 to Wexford County Council to improve an existing parking area/viewing area of the "Little Sea" (which is directly opposite this campsite). This work was subsequently completed at a not insubstantial cost.
As a result of the unauthorised campsite business' continued operation, please note the actual "view" from the Little Sea viewing point. See **exhibits 7, 8 and 9** for reference.

The campsite business is a blight on the landscape and significantly injures visual amenity all across the Bannow Bay special area of conservation.

The foregoing is mostly for background purposes. I would note the following specific reasons as to why substitute consent should not be granted for this private business.

1. **Severe noise pollution**:
   The applicant has been operating a campsite business without the appropriate planning permission in recent years. During the season (April/May to late September), there appears to be open-air live music/bands playing on a number of evenings per week (at least 3 nights per week/sometimes 4 nights per week). The late-night music (which often takes place up to 11pm or even later) is so loud that it is audible from at least 2 kilometres away. Many local residents (particularly elderly and those with young children) have been negatively impacted by this noise pollution. With speakers in open locations and loud "bass", the music can be is clearly audible (and very loud) inside local residential homes.
   From a personal perspective, there have been times when one of my young children comes out of their room after bedtime saying "Daddy, I can't sleep, why is that party music so loud?". This should never happen in such a quiet, rural area.
   I have enclosed a link (via email) to a recording of observed noise volumes from both inside and outside my home late at night from the campsite's open air music events.

   This noise is severely injurious to the residential amenity of many local residents and the development should therefore not be permitted to continue its operation.
   See **exhibit 10** outlining that there is a large population within 2km of this campsite. I have also heard from others that the music is very loud as far away as Grantstown (3km+?). Exhibit 10 is therefore conservative in terms of the number of residents who are regularly experiencing uncomfortable noise from this development.

   It is worth noting **Exhibit 11,** which details a Feb 6th, 2021 article in the Wexford people which references the applicant site and notes in the first line of the article that *"Last Summer, music blared across Roches Campervan and Campsite in Clonmines…"*.
   Music blaring is a good way of describing the negative experience of local residents in recent years.

   A google review, **Exhibit 12,** highlights the levels of noise pollution generated by the site. I quote from the review: "*My biggest problem was the late night revellers in the hard standing area. Kept us awake until 3am despite signage requesting no loud noise after 11pm, this was not enforced*".

   I would also like to note a recent decision by Wexford County Council granting permission to Blackstairs Glamping Limited (Planning Ref: 20241081) for glamping pods with hot tubs. One of the conditions associated with that that granting of planning permission was that *"noise emanating from the development shall not cause to be measured outside of any dwelling area, during the hours of 7am to 9pm a noise level of 55 dB(A), and during the hours of 9pm to 7am, on Sundays and bank holidays a noise level of 42bB(A). The noise is also not to be impulsive in nature or have any tonal element which is 5dB(A) above the adjacent frequencies"*.
   The reason for this condition was noted as being:
   "To protect the residential amenities of the adjoining dwellings and in the interests of public health".

   Unfortunately, residents who live close to the applicant campsite business (Roches) currently have no such protections. Local residences within a 2km plus radius of Roches campsite are subject to noise pollution that far exceeds these (or any reasonable) levels – however there has been no sanction whatsoever and the residential amenity of many local residents (including elderly and those with young children) is materially negatively impacted.

Loud music and outdoor concerts 3-4 times per week are wholly inappropriate in a quiet, rural setting.

2. **Visual Amenity**. Having regard to the open, elevated, coastal aspect of this site, which enters directly into Bannow Bay, the proposed development, particularly when fully occupied during busy summer periods represents a wholly incongruous development and feature in this landscape. Its continued operation would seriously injure the visual amenities of this highly scenic and visually sensitive area.
It is contrary to Objective L01 of the Wexford County Development Plan (volume 12: Strategic Environmental Assessment Environmental Report) which requires proposals to have regard to the landscape character units and their assigned landscape sensitivity and relevant guidelines. It is also contrary to objective L05: To ensure that developments are not unduly visually obtrusive in the landscape, in particular, in or adjacent to the Upland, River Valley, Coastal or Distinctive Landscape Character Units

   A recent local example of a planning application for a small, single-story residential dwelling (Wexford County Council planning reference: 20250125) which is located close by (and also overlooking Bannow Bay) may be relevant. The wording of Wexford county councils planning report is thus: *"The proposed dwelling has not been designed taking into account the highly sensitive nature of the landscape and would be prominently located on an unscreened site in close proximity to a distinctive coastal landscape. The proposed development would likely result in an obtrusive feature on the landscape and thereby distract from the views, prospects and special amenity value of the coastal landscape and would set an inappropriate and undesirable precedent for further development of this nature"*. The above wording relates to a simple single story residential dwelling. When such stringent criteria are applied to a single dwelling, one would imagine that a campsite/campervan park occupying hundreds of metres of coastal land at a similar location in an unscreened development would at least need to be considered as having a similar, if not more severe, impact, on visual amenity.

3. **Negative impact on wildlife within Bannow Bay Special Protection Area (SPA) IE0004033 and Special Area of Conservation (SAC) IE0000697**:
The above-mentioned noise pollution should be considered as one aspect of many that could have a negative impact on wildlife within the Bannow Bay.

   Bannow Bay is a Special Protection Area for thirteen named species of geese, ducks, waders together with wetland and waterbirds in general (i.e. Light-bellied Brent Goose (as noted below), Shelduck, Oystercatcher, Golden Plover, Grey Plover, Lapwing, Know, Dublin, Blacktailed Godwit, Bar-tailed Godwit, Curlew and Redshank.

   The applicants "NATURA" report which was submitted to Wexford County Council in late 2022 (planning reference 20211928) highlighted the following concerns which are worth repeating here:
Section 9.1.13 notes that *"increased numbers of people on the subject site will likely lead to increased numbers of people descending onto the foreshore.... <u>It is therefore probable that feeding and/or roosting wild birds will be disturbed via movements, noise etc, from traffic and people using the proposed campsite"</u>*
Table 11: *"the potential for disturbance is likely to be high on occasion"*.

As Bannow Bay is a legally designated area for the protection of wild birds (htps://www.irishstatutebook.ie/eli/2011/si/592/made/en/print), the proposed development should not be permitted based on the above observations alone.

There was previously (and perhaps still is) a healthy Eurasian Otter population in the Bay close to this unauthorised development.

4. **Potential negative impact on water quality of Bannow Bay.**
Bannow Bay is already an area that is described as being "at risk" of not achieving good water quality (as per Irish Water, the EPA).
Anecdotal local evidence would also suggest that the water quality of Bannow Bay has deteriorated in recent years – this has, perhaps coincidentally, occurred at the same time as this camper park has been operating without planning permission.

I would highlight the following comments from the applicant's "Natura report" submitted to Wexford County Council as part of application 20221465 in late 2022, "Permission for the proposed development of lands to be used for a camper, caravan & campsite and for the change of use of 2 no. agricultural buildings; shed A to be changed to a communal use building which includes toilet facilities, and shed B to be changed to a covered area for seating and refreshments and a new treatment plant & percolation area".:
Table 12: "the proposed development has the potential to cause a deterioration in the water quality that sustains the wetland site at Bannow Bay".
Section 9.1.24: "Consequences of the above assessment (Table 12), it is concluded that advancement of the proposed development has an indirect potential to impact negatively on the adjoining mudflats and that ***that impact has the potential to be significant*****.....**"

The crowds on site during the summer months at this camping business are sizeable (note **exhibits 13 & 14).** It begs the question as to how human waste is being disposed of. Many local residents are rightly being asked to have their residential waste treatment systems inspected by Wexford County Council to ensure they are operating efficiently and not creating any environmental issues. I wonder how environmental concerns regarding human waste are being applied to this campsite business, which regularly has hundreds of people on site?
As long as this campsite continues to operate, the risk of environmental pollution to Bannow Bay Special Area of Conservation increases every year.

A 2023 EPA report on water quality specifically noted concerns regarding high phosphate levels in many areas, including estuaries. This is often caused by factors such as poorly treated wastewater from sewage plants and agricultural run off. The former would clearly be considered a concern with this campsite.

It is also worth noting that Wexford county council has been highlighted by the EPA (in late 2024) as being one of 6 counties which failed to achieve a "strong or excellent" score in 10 or more of the 20 priority areas. Dr Tom Ryan, Director of the EPA's Office of Environmental Enforcement said that leadership was needed at local authority level. *"The effective enforcement of environmental law is essential to identify polluters and non-compliant operators, and to hold them to account. Local authority leadership is critical in delivering better environmental outcomes through the prioritisation of environmental enforcement and the appropriate allocation of resources."*
This is not surprising when certain local politicians appear to advocate for and on behalf of non-compliant businesses such as Roches campsite.

5. **The applicants Natura report accompanying the substitute consent application contains some concerning findings:**
It is worth highlighting that the "Remedial Screening Report and a Remedial Natura Impact Statement" compiled by SWC Promotions has been sourced and paid for by the applicant in question. As a result, one should not be surprised by the conclusions of that report.
I would note that the report was compiled largely via desk-based analysis, accompanied by a site visit on 7th January 2025. Hence, the author of the report was unable to assess the real level of activity on site during the busy summer months (e.g. number of people and vehicles on site, where those people and vehicles are located, the level of waste produced, noise pollution, activity on the foreshore).

A closer inspection of the report reveals some concerning (but unsurprising) findings.:

- The slipway constructed directly into Bannow Bay SAC/SPA was constructed with *"neither planning permission, a foreshore license or consent form the Minister regarding Activities Requiring Consent (ARC's) in the protected areas were sought for either the slipway, the land reclaimed from the foreshore, or their associated coastal protection works"*. This follows a theme of the applicant's disregard of proper planning regulations for the site at large.
  Given this history, how could An Coimisiún Pleanála have any confidence in the proposed "mitigation measures" noted in the report commissioned on behalf of the applicant?
- Page 36: Section 3.8.6. The author of the report notes that *"the timber piling (shown in the picture) suggests that a jetty is under construction"*. This is yet another example of a complete disregard of proper planning by the applicant. A new jetty here would have the potential for even greater disturbance to wildlife (e.g noise pollution from engine-powered craft) and water pollution (fuel/oil leaks) from engines.
- The author notes on page 38 that *"it (the site) was used for a campsite but has reverted to pasture as part of a working dairy farm. When the campsite was in operation, the field as essentially an undisturbed grassland for at least five months of the year.."* The author of this report appears unaware that the campsite has been operational effectively year around (albeit with seasonal peaks from mid-March to late September) for the past number of years.
- P. 52: *"The answers given above (Figure 30) indicate that the application site may have the potential to impact on a protected Natura 2000 site"*
  - *"Will the advancement of the appliciation result in the loss, reduction, alteration or fragmentation of habitat from any Natura 2000 site, make any habitat more vulnerable to change or less resilient to external change. Answer: Yes."*
- P. 55: Identified impact on habitats, species and water quality.
- P. 57: *"It is considered that **a certainty exists that loss of habitat will occur** from the Bannow Bay Natura 2000 site, and that a **likelihood (read as possibility) exists of both disturbance occurring of wild birds** that are qualifying interests of the site**, and pollution** from runoff of deleterious matter from the application site entering surface drains and/or groundwater with subsequent onward flow to the adjoining bay resulting in a deterioration in the quality of the waters that sustain the Bannow Bay Natura 2000 site and the biodiversity it supports."*
- Pages 74-75: Impact on mudflats and sandflats:
  - Damaging impacts may arise from the proposed development promoting recreational activities adjoining shore and in the adjoining waters.
  - Negative because it is a conservation objective to maintain and/or increase the area of the mudflat habitat.

- Possible significant (damage)
- Possibly permanent in nature.

- Pages 76-78: outlines the significance of the "Kiltra subsite" area (which directly surrounds the applicant site) in terms of roosting bird populations. It is abundantly clear that noise pollution, environmental pollution and activity from visitors to this campsite business could have a severe, permanent negative impact on bird populations.

6. **Recommendation of Wexford County Council's own Environment section dated February 2nd, 2022.**
Please note the formal opinion of Wexford County Council's Environment section regarding planning application reference 20211928 by this applicant at this same site ("agricultural sheds"). The letter is included in the appendix in full (**exhibit 15**) and I would highlight the following comments from the Environment section:
*"It is considered that **the development poses a very serious risk of pollution to the adjacent shellfish waters in Bannow Bay**, which Bord Iascaigh Mhara have informed us is worth in excess of 3 million euro to the local economy, and which is already under pressure due to a number of water quality incidents"*

The comments above regarding the value of this shellfish industry to the local economy are significant. This potential negative impact would significantly outweigh any short-term/seasonal tourism-related benefits for the local economy were this campsite business allowed to continue operating.

Any potential for serious water pollution (e.g. from treatment plant, chemical waste) arising from this unauthorised campsite business should be considered as significant concerns for the local shellfish industry and hence for the local economy. The potential impacts (should pollution occur) are too large to be ignored.

7. **The site is currently subject to a Planning Enforcement Order (PE0160/2020).**
The applicant provided undertakings to Wexford county council (reference **exhibit 16,** letter Roche dated 9th February 2022, as part of planning application 20211928) that:
"the toilets were used for the camper site which has now closed down due to the enforcement notice. These toilets have now been decommissioned and sealed up from use as per attached photographic evidence.... It is intended to store implements, trailers, bales etc, in these sheds ancillary to the existing farm".

Despite the above, the camper site operated as normal since that undertaking was provided and the enforcement order has been ignored.

I would also note that the Enforcement order relates to more planning issues than just those two agricultural sheds.
Specifically, the planning enforcement order also required:

- *"Removal of **five** unauthorised buildings from the site (namely two steel framed sheds, the metal clad reception structure and two metal clad shower and toilet blocks).*
- *Removal of the unauthorised concrete jetty and access road, the surfaced parking area, the walking trails and fencing, under the guidance of the National Parks and Wildlife Service to establish appropriate methods for the removal works in the interests of protecting the habitats and environment of the Bannow Bay Special Area of Conservation (Site Code 00697) and Bannow Bay Special Protection Area (Site Code 004033)."*

8. **The proposed development is contrary to the criteria regarding campsites and campervan parks in Wexford County Development Plans.**
   a) The proposed development in an unserviced rural coastal area is contrary to Section 7.4.8 of the County Development Plan 2013-2019 and specifically Objective TM29 and TM33 which seeks to restrict camping/glamping and caravan parks to built-up areas, and Objective RS18 which seeks to prohibit the development of static caravan and camping sites in open and exposed coastal areas.
   These criteria are not satisfied in this situation given the rural, exposed, coastal location of the proposed development site.
   b) One stated purpose of the Wexford County Development Plan (2022 – 2028) is to reconcile development needs with environmental protection. The proposed development in an unserviced coastal location is contrary to Chapter 7 "Tourism Development" of the County Development Plan 2022-2028 whereby the development of "Camping, Motorhome Parks, Glamping and Caravan Parks" should "*be located within or nearby existing settlements with pedestrian and cycle linkages provided*".
   The above criteria are not satisfied in this instance given the rural location of the proposed development, which is distant from any population centre. It would take over one hour to walk to/from the closest population centre of Wellingtonbridge. The development is accessed via a local road network with limited width.
   As a result of access being solely via car/campervan, the proposed development would lead to excess traffic movements, increased carbon emissions and unnecessary air pollution in this sensitive location (Bannow Bay SAC and Bannow Bay SPA).
   c) The Wexford County Development Plan 2022-2028 states that "*Consideration will be given to camping/glamping and more home parks in the rural area where it can be demonstrated that the development would not significantly impact on the rural character of the area and have no significant impact on the surrounding environment*".
   This is demonstrably not the case with this particular unauthorised campsite business in Bannow Bay Special Area of Conservation.

9. **Undesirable precedent:**
   The land in subject is agricultural land in an area of high sensitivity. Allowing this development would directly undermine the coastal landscape and it would represent a highly undesirable precedent in such a coastal setting. It would therefore threaten the proper planning and sustainable development of the area.
   Should this unauthorised campsite business be allowed to continue operating, what would stop other landowners in the vicinity with scenic land holdings identifying how financially lucrative a campsite business is and subsequently opening similar campsite businesses of their own? This would lead to a "wild west"-type situation and further injure the visual amenity of the local area.
   Wexford county council is currently dealing with a high level of alleged planning breaches. Allowing this campsite business to continue to operate would exacerbate this problem. Note **exhibit 17** for background.

10. **Many alternative campervan parks/campsites operate locally.**
   It appears that a local politician has made the point that illegal parking of campervans may be an issue in Wexford. The implication appears to be that An Coimisiún Pleanála should therefore consider this point when assessing the substitute consent application by the operators of Roches campsite business. However, I would note that there seems to be surplus capacity of campsites/campervan parks etc in the south Wexford area (including many which have opened recently). I would note the following options which are located very close to the unauthorised private business development that is the subject of this letter:

a. Bannow Bay Seaside Farm Motorhome Parking, Y35 Y291(just a few km away)
b. The Hollow Campervan parking/campsite, Y34 FH66 (just a few km away)
c. Coral Gables Campervan site, Fethard on Sea
d. Ocean Island Caravan & Camping Park, Fethard on Sea.
e. The Norman View Campervan Park, Fethard on Sea.
f. Kilmore Quay Camping & Holiday Park, Kilmore Quay.
g. St Margarets Beach Caravan & Camping Park, Lady's Island.
h. Ferrybank Caravan & Camping Park, Wexford Town
i. International Outdoor Adventure Centre (IOAC), Tagoat
j. The Trading Post Camping & Caravan Park, Ballyvought.

There are likely many others that I have neglected to note. It is clear that multiple options for campervans exist locally. Should there be an issue with illegal campervan parking, it would appear to be an issue of enforcement. Adding yet another (unauthorised) campsite/campervan business is highly unlikely to have any material impact on illegal campervan parking (if it is indeed a serious issue).

11. **The applicant's "biodiversity report" lacks credibility.**
This is because the document, prepared by O'Leary Consulting, outlines a plan for a campervan/campsite footprint that is far smaller than the actual, expanded footprint of the campsite business. The relevant section of the biodiversity reported has been reproduced as **exhibit 18.**
As shown earlier in exhibits 3,4,5 and 6, the site has expanded significantly into both the northern and southern agricultural fields adjacent to the prior, core area of the campsite. The biodiversity report (and all of the documents including as part of the submission) does not accurately reflect the actual scale of the campsite during peak periods. Hence documents outlining "woodland area", "hedge planting" and "bird nesting boxes" are fictitious at best. Compare exhibits 17 with exhibits 3,4,5 and 6 to clearly visualise this issue.

In light of the above, I would urge An Coimisiún Pleanála to reject this application for substitute consent as the continued operation of this campsite business would be contrary to the proper planning and sustainable development of the area.

Yours sincerely,

Brendan Lynch

Appendix

Exhibit 1: Google maps showing hard paving areas created a couple of years ago (after the enforcement order).

Exhibit 2: Associated deep cutting into the landscape right on the boundary to Bannow Bay Special Area of Conservation.

Exhibit 3: Google maps outlining recent expansion of the footprint of this campsite business. The areas in red are the fields into which the campsite has expanded in 2024, i.e. since the enforcement order was issued.

Exhibit 4. Hard stone paving roadway/parking area in another agricultural field (to the north) (work done during 2025 despite the enforcement order). This would appear to be in the same area of the development where the "Biodiversity report" proposes so-called "woodland areas" and "bird nesting boxes".

This shows a continued disre gard for proper planning.

Exhibit 5: Expanded area to the North of the site. This is an example of many tents/caravans/campervans in the area highlighted red to the right in Exhibit 3.

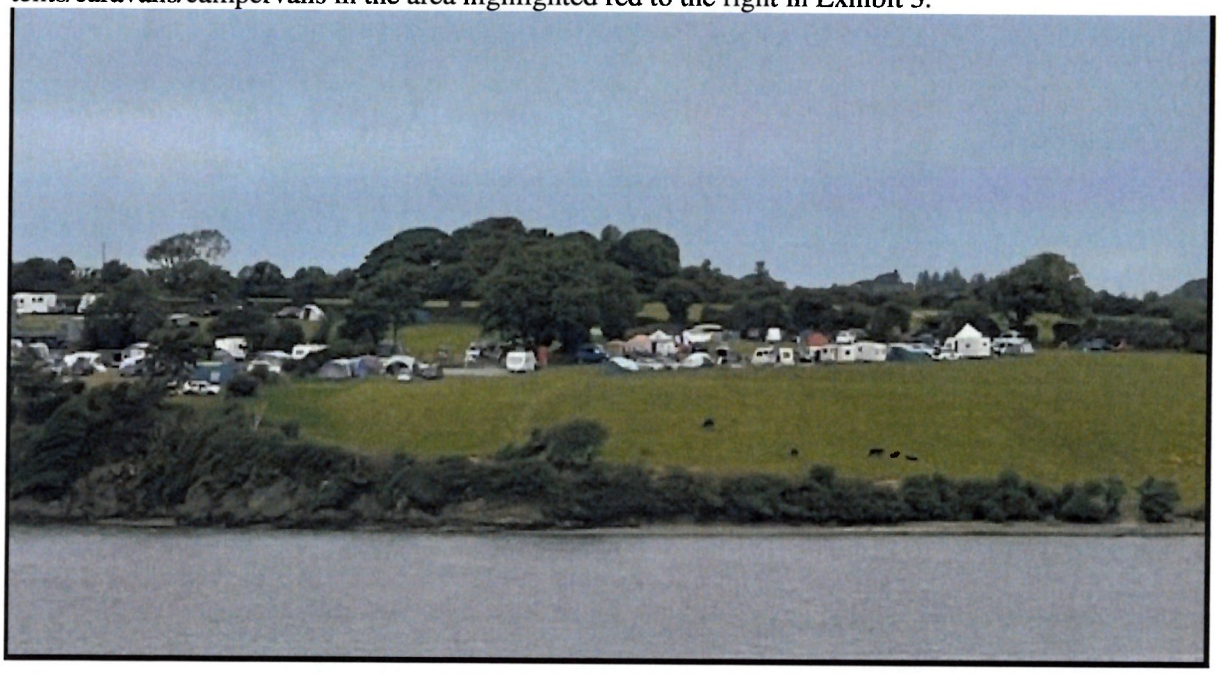

Exhibit 6: expanded area to the south of the site. This is another example of many tents/caravans/campervans in the area highlighted red to the right in exhibit 3.

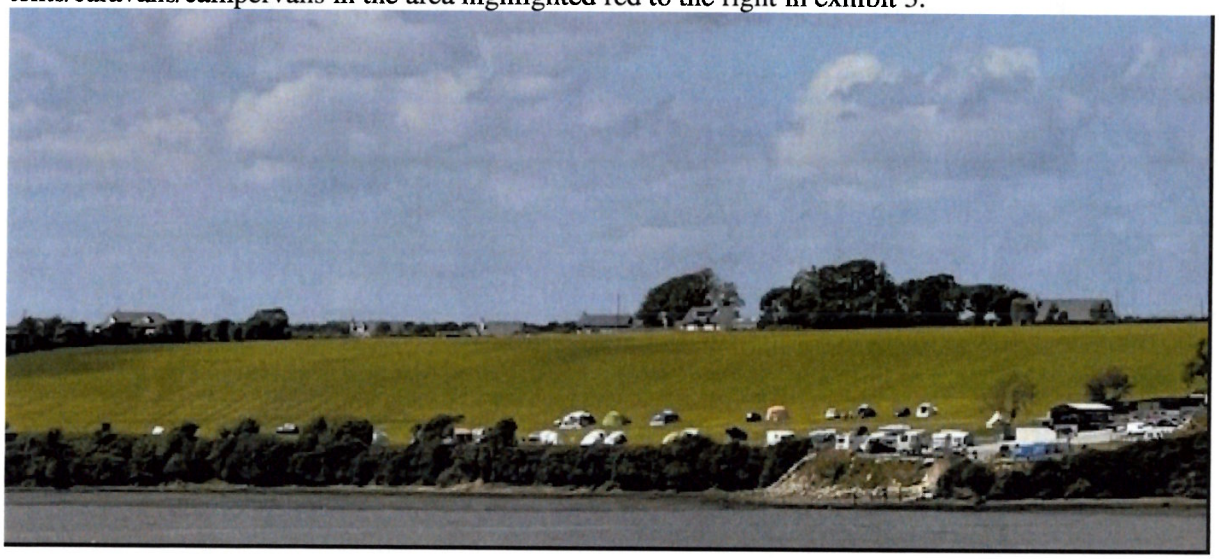

Exhibit 7: The Norman Wayviewing point of the Little Sea.

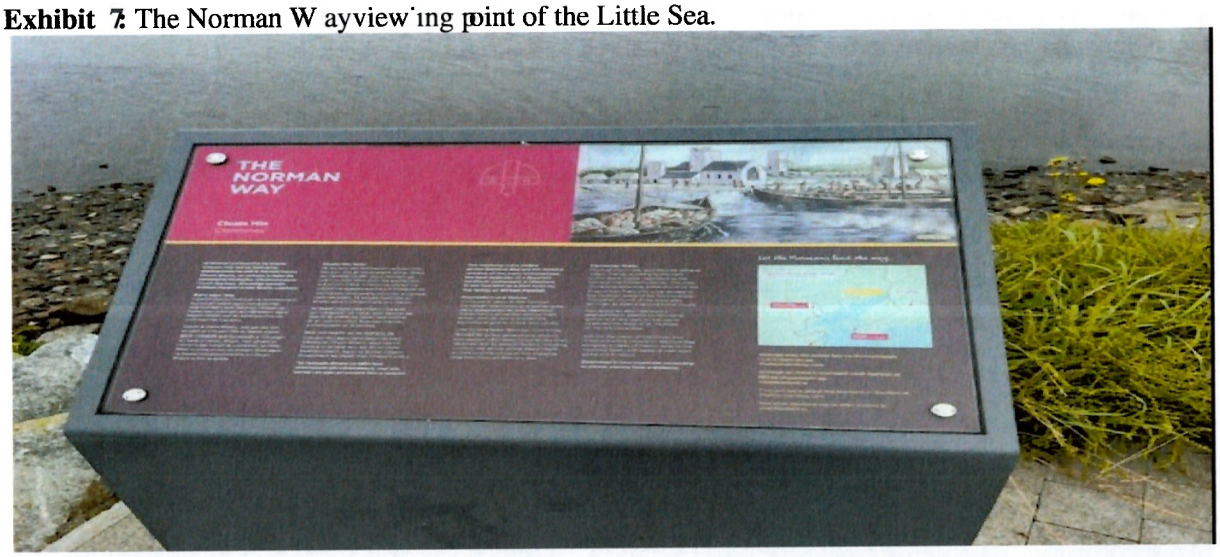

Exhibit 8: Local newspaperarticle from September2024 regardingsame.

Heritage Week project in Carrig-on-Bannow highlights history of Wexford's cultural heartland

By SIMON BURKE

Visitors to one of the most historic parts of Wexford will have the opportunity to learn more about that history thanks to a new county council initiative launched to coincide with Heritage Week.

Two information panels have been erected at the Little Sea viewing point in Barrystown on The Norman Way, each offering insight into an area which saw the first Norman settlers in Ireland arrive in the 12th century.

Speaking at the unveiling of the panels, Cathaoirleach of the Rosslare Municipal District (RMD) Councillor Jim Codd said there wasn't a parish in Wexford which could compete with Carrig-on-Bannow for "culture, heritage, music, language and natural beauty".

"What happened here in 1169 has defined Irish history, the Norman town which sprung up here had 160 families here by the year 1300," said Cllr Codd. "The place names still tell the history, we live in a wonderful place, it's our responsibility to maintain and care for it."

Some of that heritage is depicted on a panel which details the history of mining in the area.

"It relates to mining in Barrystown from the 1540s under the rule of Henry VIII right up until 1960 when the last attempt to glean metals here occurred," said Cllr Codd. "The engine house we see here is Cornish-design from the 1840s and works on the engine house and the ongoing uncovering of the rich history of this area have been undertaken by the Barrystown Historical Society.

"I want to thank them most sincerely for their work we as a council owe a debt of gratitude to them."

The second information panel focuses on the flora and fauna of Bannow, species which are now in all too short supply nationwide.

"The panels depict the beloved brent geese, of which flocks arrive here every autumn from the Canadian High Arctic," continued Cllr Codd who paid tribute to historian Jim Hurley for his work on the project.

"His love and care for the wildlife of south Wexford is something that he'll passed on to thousands of students who had the good luck to have him as a teacher."

Further praise went to district management of the RMD, Ms Nóirín Cummins a woman who Cllr Codd said was "utterly committed to highlighting the beauty of Bannow".

Jim Hurley, Cllr Jim Codd (cathaoirleach Rosslare Municipal District), Eamonn Hore (Senior engineer, Wexford County Council) and District manager Nóirín Cummins pictured with staff from the Rosslare Municipal District, Assured Services and members of the Bannow Historical Society at the launch of viewing panel Natural Wexford in Bannow. Pic: Jim Campbell

Exhibit 9: The **actual view** from this Little Sea viewing point. The hill and much of the field immediately opposite the Little Sea viewing area is populated by tents/caravans/campervans. This view is also adjacent to the ancient Clonmines castles and church.
This is contrary to the Wexford County Development Plan in many aspects.

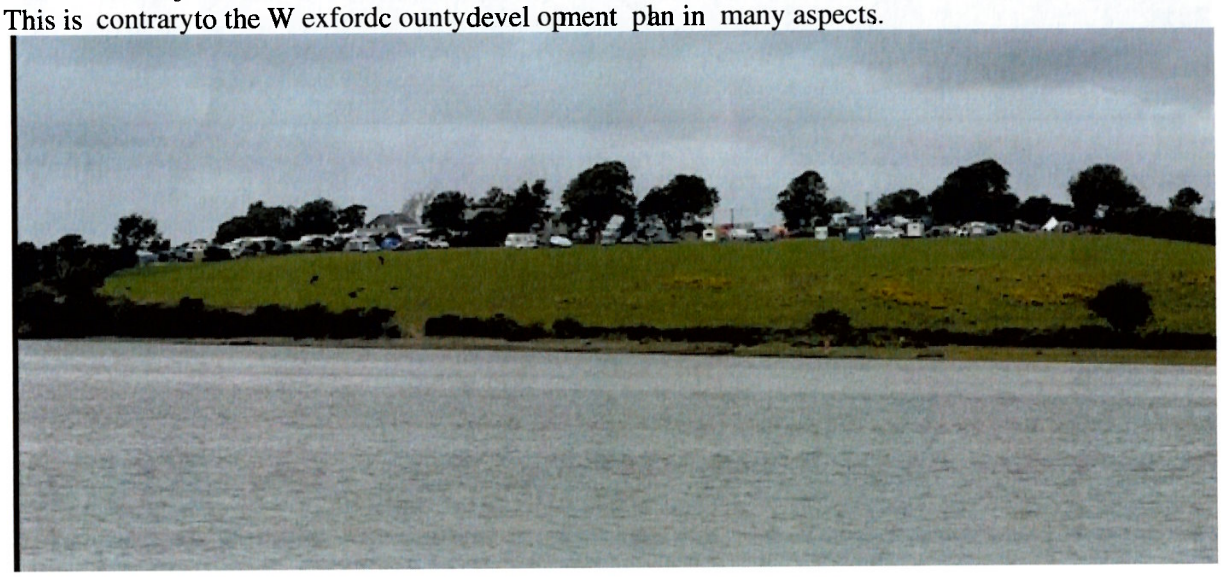

Exhibit 10: 2km zone from the development.
Many residential dwellings are impacted by noise pollution:

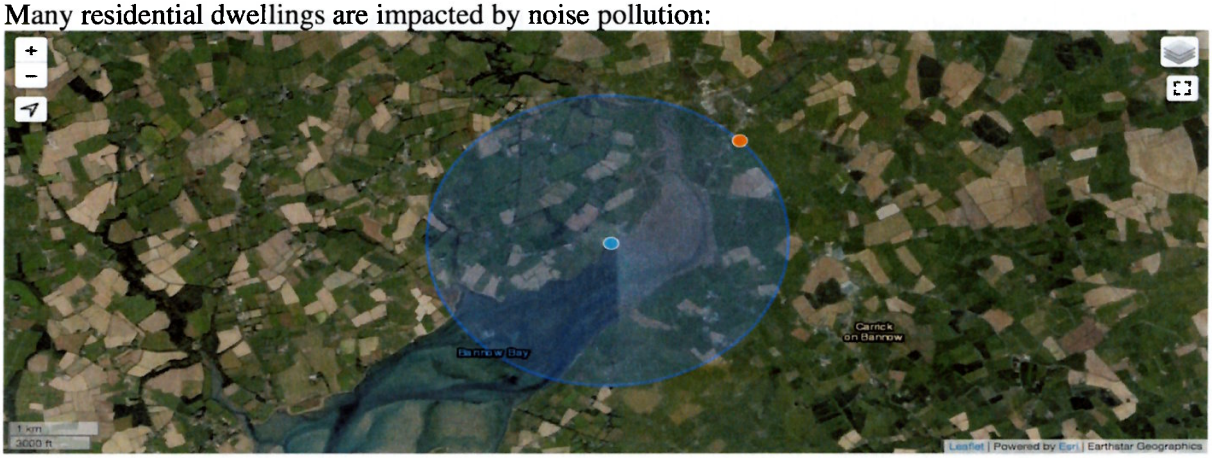

Exhibit 11. Newspaper article touting music "blaring", 2021.

independent.ie

Wexford | Subscribe

John Roche:

Last summer music blared across Roche's Campervan & Campsite in Clonmines as families were reunited, cousins played and barbecue food and beer was enjoyed.

Owner John Roche hopes this can happen this summer. 'It's absolutely mad at the moment but it all depends on this Covid. We've a lot of bookings coming in. When we did open last year it was June 29. Normally we'd open on Paddy's Day. We keep a lot of tents here, more and more last year. We turned away hundreds for the last two years; people from all over the country. We also do campervans and caravans. We don't take that many because they are a lot of work. We have a big field and we put them all into the big field. We've electricity for up to 30 campervans.'

Exhibit 12: Interesting third-party review of the campsite from Google Reviews, highlighting problematic noise levels.

← Roches Campervan and Campsite

Overview Prices Reviews Location Photos Abo

All Property (55) Nature (68) Locatio

Most helpful All reviews

Susan Collier 2/5

3 months ago on Google

Spent 2 nights here, very rustic. The toilets weren't gender separated and not enough of them, cold water only in the toilet block and 2 hand dryers 1 not working 1 barely working. Full bathroom pods in the kitchen area bizarre ! No designated area for grey water. The showers on top of hill were adequate but only 4 for the whole site could have done with double that. No internet and no beach ! My biggest problem was the late night revellers in the hard standing area. Kept us awake until 3am despite signage requesting no loud noise after 11pm, this was not enforced. On a positive side the live music on both nights was very good. Staff were pleasant and very helpful. The coffee dock, take out and wine bar well presented. Also extra activities available. We had heard mixed reviews of Roches but decided to make up our own mind. This experience was disappointing and we wouldn't go back.

Trip type Vacation Couple

Service 3 0 Location 2 0

Exhibit 13: L argenumbers on site. Concerns for visual amenit yand safe waste disposal .

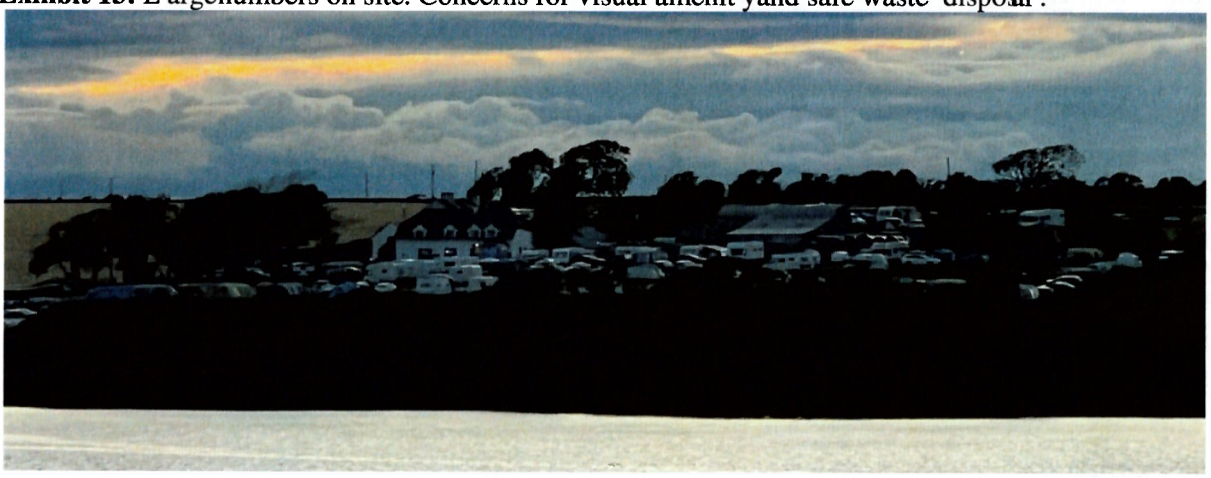

Exhibit 14: Lar genumbers of site (from the o perators Facebook page)

Exhibit 15: Recommendation of Wexford County Council Environment section. This memo is of vital importance and speaks to one of the many material environmental concerns associated with this campsite business.

MEMO: PLANNING SECTION

PLANNING APPLICATION: 20211928

APPLICANT: John Roche

RECOMMENDATION: REFUSAL

With regard to the above application and the further information request by the planning section the following points are noted:

1. This site is subject to a number of investigations under the Water Pollution Act 1977 as amended.
2. Shed A cannot be considered for retention as an Agricultural Shed as it is not designed as an agricultural storage shed. It is designed as a public space and is on inspection in January 2022 still not being used as an agricultural storage shed
3. Shed A currently still contains toilet and washing facilities in the area marked "Storage Area" on drawings submitted.
4. Shed A still currently contains a seating area with sink and refrigeration facilities in the area marked "Agricultural Storage Area" on drawings submitted
5. It is considered that the development poses a very serious risk of pollution to the adjacent shellfish waters in Bannow Bay, which Bord Iascaigh Mhara have informed us is worth in excess of €3 million to the local economy, and which is already under pressure due to a number of water quality incidents.

In view of the above Wexford County Council Environment Section reiterates its view that this planning permission is **Not Granted**

Signed _____ Date _____

Authorised _____ Date 21.2.22

WEXFORD COUNTY COUNCIL
RECEIVED
23 FEB 2022
PLANNING SECTION

Exhibit 16: The below letter is misleading at best. The campsite was operational within a few weeks of this undertaking being provided in writing to Wexford County Council.

2021 1 1 9 2 8

JOHN ROCHE ARCHITECTURAL SERVICES
PLANNING & CONSTRUCTION SERVICES
TEL: 051-562648 MOB: 087-6331420
EMAIL: INFO@JROCHEARCHSERVICES.COM

09 Feb 2022

Planning Dept:
Wexford Co.Council
County Hall
Carricklawn
Wexford

WEXFORD COUNTY COUNCIL
RECEIVED
09 FEB 2022
PLANNING SECTION

ATT. OF: Graeme Hunt

Re: Additional information request for John Roche
At: Clonmines, Tintern
Planning Reg. No. 20211 928

Answers to Requests:

1. It is intended to store implements, trailers, bales etc. in these sheds ancillary to the existing farm. The toilets were used for the camper site which was closed down due to the enforcement notice. These toilets have now been decommissioned and sealed up from use as per attached photographic evidence.
2. Shed A has now been sheeted down with timber cladding to simplify the external appearance as per attached photographic evidence. When the weather improves these will be painted accordingly to further reduce the sheds impact at this sensitive location.

Yours Sincerely,

John Roche

John Roche Dip.Arch.

John Roche
Architectural Services
St. Leonards, Ballycullane,
New Ross
Co. Wexford

Phone:
087 6331420
E-mail address:
info@jrochearchservices.com

Exhibit 17: Undesirable precedent – breaches of planning are becoming a more serious issue in county Wexford.

included Donal Ryan, Profes- students from each county.

Kim Griffiths was awarded third place at the All Ireland Scholarships Alumni Creative Writing

Council investigating 415 alleged breaches of planning regulations

By SIMON BOURKE

THE difficulties in prosecuting those in breach of Wexford County Council's planning laws have been laid bare with a senior official admitting some cases can take years to resolve.

Providing councillors at the New Ross Municipal District (NRMD) with figures for 2024, executive planner Tom Banville said there were 28 planning enforcement cases in Co Wexford before the courts at the end of last year.

Outlining the processes involved in investigating alleged breaches of planning, Mr Banville said his department reviewed all complaints submitted by members of the public and, where applicable, issued warning letters to landowners, developers, or occupiers of land potentially in breach of WCC's planning regulations.

From there, a site inspection is carried out and, if an unauthorised development is discovered, an enforcement notice is issued.

An enforcement notice is an instruction to carry out works to rectify unauthorised development or non-compliance with planning conditions. If that notice isn't complied with WCC will initiate legal proceedings.

Providing additional figures for 2024, Mr Banville revealed that there were 415 live cases under investigation at the end of the year, that 487 warning letters were issued, 238 enforcement notices issued, and four cases were successfully prosecuted in the courts.

However, it was the cases that didn't quite make it to the judge that were of concern to Cllr John Dwyer.

"In terms of resolution on the steps of the court, what is considered an acceptable case resolution?" he asked. "If the council has gone through all the processes, including initiating legal proceedings, incurring significant costs, and then someone says outside the court that they'll comply, is that considered resolved?"

"An enforcement case is resolved when they comply with the enforcement notice," replied Mr Banville. "That notice gives strict direction to the alleged offender to remove the unauthorised development or comply with planning conditions.

Tom Banville, senior executive officer with Wexford County Council.

Unless they comply with the notice we're not going to resolve the case. If it gets to the steps of the court there may be some allowance, in that we may agree on a resolution rather than take it to court.

"It's important to remember that this is a criminal offence and these are criminal cases."

Highlighting a perceived unfairness in the system, Cllr Dwyer said there was an important distinction to be made in these criminal cases.

"But it's not criminal in the sense that the Director of Public Prosecutions (DPP) will be pursuing it," he noted. "If someone agrees to apply for planning permission after an enforcement notice it isn't fair on those who are paying their rates and adhering to the conditions. There's no account taken for the damage done to legitimate businesses operating."

With some cases within the district still making their way through the system, Cllr John Fleming asked how long, on average, a planning enforcement case took to resolve and how much it costs WCC to resolve them. He was supported by Cllr Michael Sheehan who made reference to a case which appeared to support the theory that many individuals willingly breach regulations and answer questions later.

"There are several cases (in this district), and one in particular on the N25, people went in and dug out a foundation and complaints went in. The house is now built and there's no chance of it ever being taken down. People are asking us why this can't be resolved."

Further evidence came from Cllr Pat Barden who said he was aware of several instances where people had moved onto patches of land and no action had been taken, and one where a group had moved onto a green field site and created accommodation.

"It is a slow process and I realise members of the public and the complainants get quite frustrated by this," answered Mr Banville. "But once we take a case to the court and we're waiting for it to be heard, there's very little more we can do. Cases can be adjourned several times, it can go on for a while, a year, 18 months, or even two years.

"Ideally we want to resolve it before it gets to court."

Confirming that defendants did not pay WCC's legal costs if a case was settled out of court, Mr Banville also said that the council was powerless to investigate cases where a potential breach of planning may be imminent.

"With any complaint we get in relation to a perceived or potential development on a site, we issue a warning letter to the landowner and ask them to respond," he said. "There's a lot of fear about perceived developments, we hear that a lot, we get complaints about developments that are going to happen, but there's nothing we can do about it until it actually happens."

IT'S IMPORTANT TO REMEMBER THAT THIS IS A CRIMINAL OFFENCE AND THESE ARE CRIMINAL CASES

Exhibit 18: The applicants "Biodiversity plan" is not credible:
As can be clearly seen from exhibits 1 to exhibit 6, the campsite operates on a far larger footprint than is outlined in the below graphic contained in the document entitled "Biodiversity Plan", which accompanies this application.
The biodiversity plan therefore lacks any credibility.

Cathy.

Catherine Flynn

From:	Brendan Lynch <brendan.lynch4545@gmail.com>
Sent:	Friday 15 August 2025 11:41
To:	Appeals2
Subject:	Case Number SU.26 322985 - Roches Campsite, Clonmines, Wellingtonbridge, Co. Wexford.
Attachments:	ACP Letter, 12th August 2025.pdf; IMG_3387.mp4; IMG_3388.mp4

Dear Ronan Megannety/Appeals Department,

Please find attached a letter outlining my observations in relation to this unauthorised development which is currently attempting to regularise planning.

I strongly believe that substitute consent should not be granted for this campsite business.

I have also attached two compressed video files to highlight the severe nose pollution that local residents must endure from this campsite (both were taken at approx 10pm on a recent weekend). Both were taken on an iPhone and while they do not clearly convey the bass and how that amplifies the impact of the music, they may provide an idea as regards the level at which music is played. Depending upon the software used, please listen to both with the volume set to a medium/above medium level. I believe that you will likely find the level of noise as highly intrusive.
My home is located between 1 and 2km from this campsite.
The first video is taken from **inside** my home while the second is taken from the garden.
Should you have any difficulty in accessing these recordings, perhaps you could be kind enough to let me know. I believe that they are crucial in understanding an important aspect of this case - i.e. the negative impact of noise pollution both on the residential amenity of local residents and on the local bird/wildlife population at this sensitive coastal location.

Could you please acknowledge receipt of this communication?

A copy of this letter will also follow via post.

Kind regards,
Brendan

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1, D01 V902

Brendan Lynch
Barrystown
Wellingtonbridge
County Wexford.

13th August 2025

Case Reference: SU26.322985
Clonmines, Wellingtonbridge, Co. Wexford – camping/camp site enterprise.

Dear An Coimisiún Pleanála,

I am writing to you in relation to this unauthorized, privately run camping/campsite business which is located within/adjacent to the Bannow Bay Special Protection Area (SPA) IE0004033 and Special Area of Conservation (SAC) IE0000697.

The applicant has been operating this business without any regard to proper planning and has failed to comply with an enforcement order from Wexford county council (ref: PE0160/2020)). The business is located in a coastal and scenic position in a quiet, rural area.

The owner of this unauthorised campsite business has ignored the enforcement order taken by Wexford County Council and has, in fact, significantly expanded the scale of the business since the enforcement order was served.

For evidence of this, please note the following exhibits in the appendix to this letter:

- **Exhibit 1**: Google maps image outlining expansion of the works on site that should require planning permission despite an enforcement order being in place.
- **Exhibit 2**: Deep cutting in the shale to create another campervan parking area directly onto the foreshore (despite the enforcement order).
- **Exhibit 3**: Google maps image outlining expansion of the campsite footprint into both northern and southern agricultural fields.
- **Exhibit 4:** Google maps image showing new hard paving areas developed during 2025 (despite the enforcement order).
- **Exhibit 5**: Image of the expanded area to the North of the site into another adjacent piece of agricultural land
- **Exhibit 6:** Image of the expanded area to the south of the site into another adjacent piece of agricultural land.

As part of this correspondence, I would like to highlight the great work of a genuine local community/tourism initiative. This relates to Bannow Historical Society and can be evidenced via planning application 20201083 to Wexford County Council to improve an existing parking area/viewing area of the "Little Sea" (which is directly opposite this campsite). This work was subsequently completed at a not insubstantial cost.
As a result of the unauthorised campsite business' continued operation, please note the actual "view" from the Little Sea viewing point. See **exhibits 7, 8 and 9** for reference.

The campsite business is a blight on the landscape and significantly injures visual amenity all across the Bannow Bay special area of conservation.

The foregoing is mostly for background purposes. I would note the following specific reasons as to why substitute consent should not be granted for this private business.

1. **Severe noise pollution**:
   The applicant has been operating a campsite business without the appropriate planning permission in recent years. During the season (April/May to late September), there appears to be open-air live music/bands playing on a number of evenings per week (at least 3 nights per week/sometimes 4 nights per week). The late-night music (which often takes place up to 11pm or even later) is so loud that it is audible from at least 2 kilometres away. Many local residents (particularly elderly and those with young children) have been negatively impacted by this noise pollution. With speakers in open locations and loud "bass", the music can be is clearly audible (and very loud) inside local residential homes.
   From a personal perspective, there have been times when one of my young children comes out of their room after bedtime saying "Daddy, I can't sleep, why is that party music so loud?". This should never happen in such a quiet, rural area.
   I have enclosed a link (via email) to a recording of observed noise volumes from both inside and outside my home late at night from the campsite's open air music events.

   This noise is severely injurious to the residential amenity of many local residents and the development should therefore not be permitted to continue its operation.
   See **exhibit 10** outlining that there is a large population within 2km of this campsite. I have also heard from others that the music is very loud as far away as Grantstown (3km+?). Exhibit 10 is therefore conservative in terms of the number of residents who are regularly experiencing uncomfortable noise from this development.

   It is worth noting **Exhibit 11,** which details a Feb 6th, 2021 article in the Wexford people which references the applicant site and notes in the first line of the article that *"Last Summer, music blared across Roches Campervan and Campsite in Clonmines…".*
   Music blaring is a good way of describing the negative experience of local residents in recent years.

   A google review, **Exhibit 12,** highlights the levels of noise pollution generated by the site. I quote from the review: "*My biggest problem was the late night revellers in the hard standing area. Kept us awake until 3am despite signage requesting no loud noise after 11pm, this was not enforced".*

   I would also like to note a recent decision by Wexford County Council granting permission to Blackstairs Glamping Limited (Planning Ref: 20241081) for glamping pods with hot tubs. One of the conditions associated with that that granting of planning permission was that *"noise emanating from the development shall not cause to be measured outside of any dwelling area, during the hours of 7am to 9pm a noise level of 55 dB(A), and during the hours of 9pm to 7am, on Sundays and bank holidays a noise level of 42bB(A). The noise is also not to be impulsive in nature or have any tonal element which is 5dB(A) above the adjacent frequencies".*
   The reason for this condition was noted as being:
   "To protect the residential amenities of the adjoining dwellings and in the interests of public health".

   Unfortunately, residents who live close to the applicant campsite business (Roches) currently have no such protections. Local residences within a 2km plus radius of Roches campsite are subject to noise pollution that far exceeds these (or any reasonable) levels – however there has been no sanction whatsoever and the residential amenity of many local residents (including elderly and those with young children) is materially negatively impacted.

Loud music and outdoor concerts 3-4 times per week are wholly inappropriate in a quiet, rural setting.

2. **Visual Amenity**. Having regard to the open, elevated, coastal aspect of this site, which enters directly into Bannow Bay, the proposed development, particularly when fully occupied during busy summer periods represents a wholly incongruous development and feature in this landscape. Its continued operation would seriously injure the visual amenities of this highly scenic and visually sensitive area.
It is contrary to Objective L01 of the Wexford County Development Plan (volume 12: Strategic Environmental Assessment Environmental Report) which requires proposals to have regard to the landscape character units and their assigned landscape sensitivity and relevant guidelines. It is also contrary to objective L05: To ensure that developments are not unduly visually obtrusive in the landscape, in particular, in or adjacent to the Upland, River Valley, Coastal or Distinctive Landscape Character Units

   A recent local example of a planning application for a small, single-story residential dwelling (Wexford County Council planning reference: 20250125) which is located close by (and also overlooking Bannow Bay) may be relevant. The wording of Wexford county councils planning report is thus: *"The proposed dwelling has not been designed taking into account the highly sensitive nature of the landscape and would be prominently located on an unscreened site in close proximity to a distinctive coastal landscape. The proposed development would likely result in an obtrusive feature on the landscape and thereby distract from the views, prospects and special amenity value of the coastal landscape and would set an inappropriate and undesirable precedent for further development of this nature"*. The above wording relates to a simple single story residential dwelling. When such stringent criteria are applied to a single dwelling, one would imagine that a campsite/campervan park occupying hundreds of metres of coastal land at a similar location in an unscreened development would at least need to be considered as having a similar, if not more severe, impact, on visual amenity.

3. **Negative impact on wildlife within Bannow Bay Special Protection Area (SPA) IE0004033 and Special Area of Conservation (SAC) IE0000697**:
The above-mentioned noise pollution should be considered as one aspect of many that could have a negative impact on wildlife within the Bannow Bay.

   Bannow Bay is a Special Protection Area for thirteen named species of geese, ducks, waders together with wetland and waterbirds in general (i.e. Light-bellied Brent Goose (as noted below), Shelduck, Oystercatcher, Golden Plover, Grey Plover, Lapwing, Know, Dublin, Blacktailed Godwit, Bar-tailed Godwit, Curlew and Redshank.

   The applicants "NATURA" report which was submitted to Wexford County Council in late 2022 (planning reference 20211928) highlighted the following concerns which are worth repeating here:
Section 9.1.13 notes that *"increased numbers of people on the subject site will likely lead to increased numbers of people descending onto the foreshore.... <u>It is therefore probable that feeding and/or roosting wild birds will be disturbed via movements, noise etc, from traffic and people using the proposed campsite</u>"*
Table 11: *"the potential for disturbance is likely to be high on occasion"*.

As Bannow Bay is a legally designated area for the protection of wild birds (htps://www.irishstatutebook.ie/eli/2011/si/592/made/en/print), the proposed development should not be permitted based on the above observations alone.

There was previously (and perhaps still is) a healthy Eurasian Otter population in the Bay close to this unauthorised development.

4. **Potential negative impact on water quality of Bannow Bay.**
Bannow Bay is already an area that is described as being "at risk" of not achieving good water quality (as per Irish Water, the EPA).
Anecdotal local evidence would also suggest that the water quality of Bannow Bay has deteriorated in recent years – this has, perhaps coincidentally, occurred at the same time as this camper park has been operating without planning permission.

I would highlight the following comments from the applicant's "Natura report" submitted to Wexford County Council as part of application 20221465 in late 2022, "Permission for the proposed development of lands to be used for a camper, caravan & campsite and for the change of use of 2 no. agricultural buildings; shed A to be changed to a communal use building which includes toilet facilities, and shed B to be changed to a covered area for seating and refreshments and a new treatment plant & percolation area".:
Table 12: "the proposed development has the potential to cause a deterioration in the water quality that sustains the wetland site at Bannow Bay".
Section 9.1.24: "Consequences of the above assessment (Table 12), it is concluded that advancement of the proposed development has an indirect potential to impact negatively on the adjoining mudflats and that ***that impact has the potential to be significant*****.....**"

The crowds on site during the summer months at this camping business are sizeable (note **exhibits 13 & 14).** It begs the question as to how human waste is being disposed of. Many local residents are rightly being asked to have their residential waste treatment systems inspected by Wexford County Council to ensure they are operating efficiently and not creating any environmental issues. I wonder how environmental concerns regarding human waste are being applied to this campsite business, which regularly has hundreds of people on site?
As long as this campsite continues to operate, the risk of environmental pollution to Bannow Bay Special Area of Conservation increases every year.

A 2023 EPA report on water quality specifically noted concerns regarding high phosphate levels in many areas, including estuaries. This is often caused by factors such as poorly treated wastewater from sewage plants and agricultural run off. The former would clearly be considered a concern with this campsite.

It is also worth noting that Wexford county council has been highlighted by the EPA (in late 2024) as being one of 6 counties which failed to achieve a "strong or excellent" score in 10 or more of the 20 priority areas. Dr Tom Ryan, Director of the EPA's Office of Environmental Enforcement said that leadership was needed at local authority level. *"The effective enforcement of environmental law is essential to identify polluters and non-compliant operators, and to hold them to account. Local authority leadership is critical in delivering better environmental outcomes through the prioritisation of environmental enforcement and the appropriate allocation of resources."*
This is not surprising when certain local politicians appear to advocate for and on behalf of non-compliant businesses such as Roches campsite.

5. **The applicants Natura report accompanying the substitute consent application contains some concerning findings:**
It is worth highlighting that the "Remedial Screening Report and a Remedial Natura Impact Statement" compiled by SWC Promotions has been sourced and paid for by the applicant in question. As a result, one should not be surprised by the conclusions of that report.
I would note that the report was compiled largely via desk-based analysis, accompanied by a site visit on 7th January 2025. Hence, the author of the report was unable to assess the real level of activity on site during the busy summer months (e.g. number of people and vehicles on site, where those people and vehicles are located, the level of waste produced, noise pollution, activity on the foreshore).

A closer inspection of the report reveals some concerning (but unsurprising) findings.:

- The slipway constructed directly into Bannow Bay SAC/SPA was constructed with *"neither planning permission, a foreshore license or consent form the Minister regarding Activities Requiring Consent (ARC's) in the protected areas were sought for either the slipway, the land reclaimed from the foreshore, or their associated coastal protection works"*. This follows a theme of the applicant's disregard of proper planning regulations for the site at large.
  Given this history, how could An Coimisiún Pleanála have any confidence in the proposed "mitigation measures" noted in the report commissioned on behalf of the applicant?
- Page 36: Section 3.8.6. The author of the report notes that *"the timber piling (shown in the picture) suggests that a jetty is under construction"*. This is yet another example of a complete disregard of proper planning by the applicant. A new jetty here would have the potential for even greater disturbance to wildlife (e.g noise pollution from engine-powered craft) and water pollution (fuel/oil leaks) from engines.
- The author notes on page 38 that *"it (the site) was used for a campsite but has reverted to pasture as part of a working dairy farm. When the campsite was in operation, the field as essentially an undisturbed grassland for at least five months of the year.."* The author of this report appears unaware that the campsite has been operational effectively year around (albeit with seasonal peaks from mid-March to late September) for the past number of years.
- P. 52: *"The answers given above (Figure 30) indicate that the application site may have the potential to impact on a protected Natura 2000 site"*
  - *"Will the advancement of the appliciation result in the loss, reduction, alteration or fragmentation of habitat from any Natura 2000 site, make any habitat more vulnerable to change or less resilient to external change. Answer: Yes."*
- P. 55: Identified impact on habitats, species and water quality.
- P. 57: "*It is considered that* ***a certainty exists that loss of habitat will occur*** *from the Bannow Bay Natura 2000 site, and that a* ***likelihood (read as possibility) exists of both disturbance occurring of wild birds*** *that are qualifying interests of the site,* ***and pollution*** *from runoff of deleterious matter from the application site entering surface drains and/or groundwater with subsequent onward flow to the adjoining bay resulting in a deterioration in the quality of the waters that sustain the Bannow Bay Natura 2000 site and the biodiversity it supports.*"
- Pages 74-75: Impact on mudflats and sandflats:
  - Damaging impacts may arise from the proposed development promoting recreational activities adjoining shore and in the adjoining waters.
  - Negative because it is a conservation objective to maintain and/or increase the area of the mudflat habitat.

- Possible significant (damage)
- Possibly permanent in nature.

- Pages 76-78: outlines the significance of the "Kiltra subsite" area (which directly surrounds the applicant site) in terms of roosting bird populations. It is abundantly clear that noise pollution, environmental pollution and activity from visitors to this campsite business could have a severe, permanent negative impact on bird populations.

6. **Recommendation of Wexford County Council's own Environment section dated February 2nd, 2022.**
Please note the formal opinion of Wexford County Council's Environment section regarding planning application reference 20211928 by this applicant at this same site ("agricultural sheds"). The letter is included in the appendix in full (**exhibit 15)** and I would highlight the following comments from the Environment section:
*"It is considered that **the development poses a very serious risk of pollution to the adjacent shellfish waters in Bannow Bay**, which Bord Iascaigh Mhara have informed us is worth in excess of 3 million euro to the local economy, and which is already under pressure due to a number of water quality incidents"*

The comments above regarding the value of this shellfish industry to the local economy are significant. This potential negative impact would significantly outweigh any short-term/seasonal tourism-related benefits for the local economy were this campsite business allowed to continue operating.

Any potential for serious water pollution (e.g. from treatment plant, chemical waste) arising from this unauthorised campsite business should be considered as significant concerns for the local shellfish industry and hence for the local economy. The potential impacts (should pollution occur) are too large to be ignored.

7. **The site is currently subject to a Planning Enforcement Order (PE0160/2020).**
The applicant provided undertakings to Wexford county council (reference **exhibit 16,** letter Roche dated 9th February 2022, as part of planning application 20211928) that:
"the toilets were used for the camper site which has now closed down due to the enforcement notice. These toilets have now been decommissioned and sealed up from use as per attached photographic evidence.... It is intended to store implements, trailers, bales etc, in these sheds ancillary to the existing farm".

Despite the above, the camper site operated as normal since that undertaking was provided and the enforcement order has been ignored.

I would also note that the Enforcement order relates to more planning issues than just those two agricultural sheds.
Specifically, the planning enforcement order also required:

- *"Removal of **five** unauthorised buildings from the site (namely two steel framed sheds, the metal clad reception structure and two metal clad shower and toilet blocks).*
- *Removal of the unauthorised concrete jetty and access road, the surfaced parking area, the walking trails and fencing, under the guidance of the National Parks and Wildlife Service to establish appropriate methods for the removal works in the interests of protecting the habitats and environment of the Bannow Bay Special Area of Conservation (Site Code 00697) and Bannow Bay Special Protection Area (Site Code 004033)."*

8. **The proposed development is contrary to the criteria regarding campsites and campervan parks in Wexford County Development Plans.**
   a) The proposed development in an unserviced rural coastal area is contrary to Section 7.4.8 of the County Development Plan 2013-2019 and specifically Objective TM29 and TM33 which seeks to restrict camping/glamping and caravan parks to built-up areas, and Objective RS18 which seeks to prohibit the development of static caravan and camping sites in open and exposed coastal areas.
   These criteria are not satisfied in this situation given the rural, exposed, coastal location of the proposed development site.
   b) One stated purpose of the Wexford County Development Plan (2022 – 2028) is to reconcile development needs with environmental protection. The proposed development in an unserviced coastal location is contrary to Chapter 7 "Tourism Development" of the County Development Plan 2022-2028 whereby the development of "Camping, Motorhome Parks, Glamping and Caravan Parks" should "*be located within or nearby existing settlements with pedestrian and cycle linkages provided*".
   The above criteria are not satisfied in this instance given the rural location of the proposed development, which is distant from any population centre. It would take over one hour to walk to/from the closest population centre of Wellingtonbridge. The development is accessed via a local road network with limited width.
   As a result of access being solely via car/campervan, the proposed development would lead to excess traffic movements, increased carbon emissions and unnecessary air pollution in this sensitive location (Bannow Bay SAC and Bannow Bay SPA).
   c) The Wexford County Development Plan 2022-2028 states that "*Consideration will be given to camping/glamping and more home parks in the rural area where it can be demonstrated that the development would not significantly impact on the rural character of the area and have no significant impact on the surrounding environment*".
   This is demonstrably not the case with this particular unauthorised campsite business in Bannow Bay Special Area of Conservation.

9. **Undesirable precedent:**
   The land in subject is agricultural land in an area of high sensitivity. Allowing this development would directly undermine the coastal landscape and it would represent a highly undesirable precedent in such a coastal setting. It would therefore threaten the proper planning and sustainable development of the area.
   Should this unauthorised campsite business be allowed to continue operating, what would stop other landowners in the vicinity with scenic land holdings identifying how financially lucrative a campsite business is and subsequently opening similar campsite businesses of their own? This would lead to a "wild west"-type situation and further injure the visual amenity of the local area.
   Wexford county council is currently dealing with a high level of alleged planning breaches. Allowing this campsite business to continue to operate would exacerbate this problem. Note **exhibit 17** for background.

10. **Many alternative campervan parks/campsites operate locally.**
   It appears that a local politician has made the point that illegal parking of campervans may be an issue in Wexford. The implication appears to be that An Coimisiún Pleanála should therefore consider this point when assessing the substitute consent application by the operators of Roches campsite business. However, I would note that there seems to be surplus capacity of campsites/campervan parks etc in the south Wexford area (including many which have opened recently). I would note the following options which are located very close to the unauthorised private business development that is the subject of this letter:

a. Bannow Bay Seaside Farm Motorhome Parking, Y35 Y291(just a few km away)
b. The Hollow Campervan parking/campsite, Y34 FH66 (just a few km away)
c. Coral Gables Campervan site, Fethard on Sea
d. Ocean Island Caravan & Camping Park, Fethard on Sea.
e. The Norman View Campervan Park, Fethard on Sea.
f. Kilmore Quay Camping & Holiday Park, Kilmore Quay.
g. St Margarets Beach Caravan & Camping Park, Lady's Island.
h. Ferrybank Caravan & Camping Park, Wexford Town
i. International Outdoor Adventure Centre (IOAC), Tagoat
j. The Trading Post Camping & Caravan Park, Ballyvought.

There are likely many others that I have neglected to note. It is clear that multiple options for campervans exist locally. Should there be an issue with illegal campervan parking, it would appear to be an issue of enforcement. Adding yet another (unauthorised) campsite/campervan business is highly unlikely to have any material impact on illegal campervan parking (if it is indeed a serious issue).

11. **The applicant's "biodiversity report" lacks credibility.**
This is because the document, prepared by O'Leary Consulting, outlines a plan for a campervan/campsite footprint that is far smaller than the actual, expanded footprint of the campsite business. The relevant section of the biodiversity reported has been reproduced as **exhibit 18.**
As shown earlier in exhibits 3,4,5 and 6, the site has expanded significantly into both the northern and southern agricultural fields adjacent to the prior, core area of the campsite. The biodiversity report (and all of the documents including as part of the submission) does not accurately reflect the actual scale of the campsite during peak periods. Hence documents outlining "woodland area", "hedge planting" and "bird nesting boxes" are fictitious at best. Compare exhibits 17 with exhibits 3,4,5 and 6 to clearly visualise this issue.

In light of the above, I would urge An Coimisiún Pleanála to reject this application for substitute consent as the continued operation of this campsite business would be contrary to the proper planning and sustainable development of the area.

Yours sincerely,

_____
Brendan Lynch

Appendix

Exhibit 1: Google maps showing hard paving areas created a couple of years ago (after the enforcement order).

Exhibit 2: Associated deep cutting into the landscape right on the boundary to Bannow Bay Special Area of Conservation.

Exhibit 3: Google maps outlining recent expansion of the footprint of this campsite business. The areas in red are the fields into which the campsite has expanded in 2024, i.e. since the enforcement order was issued.

Exhibit 4. Hard stone paving roadway/parking area in another agricultural field (to the north) (work done during 2025 despite the enforcement order). This would appear to be in the same area of the development where the "Biodiversity report" proposes so-called "woodland areas" and "bird nesting boxes".
This shows a continued disregard for proper planning.

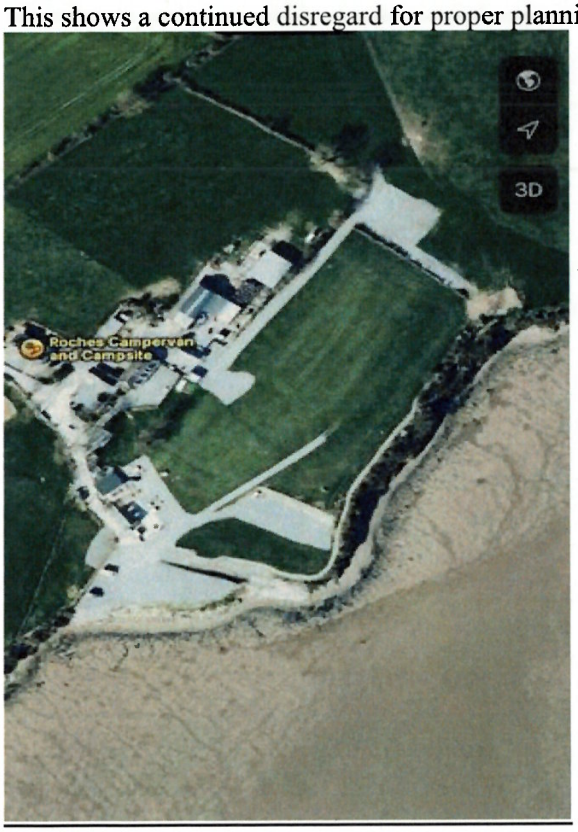

Exhibit 5: Expanded area to the North of the site. This is an example of many tents/caravans/campervans in the area highlighted red to the right in Exhibit 3.

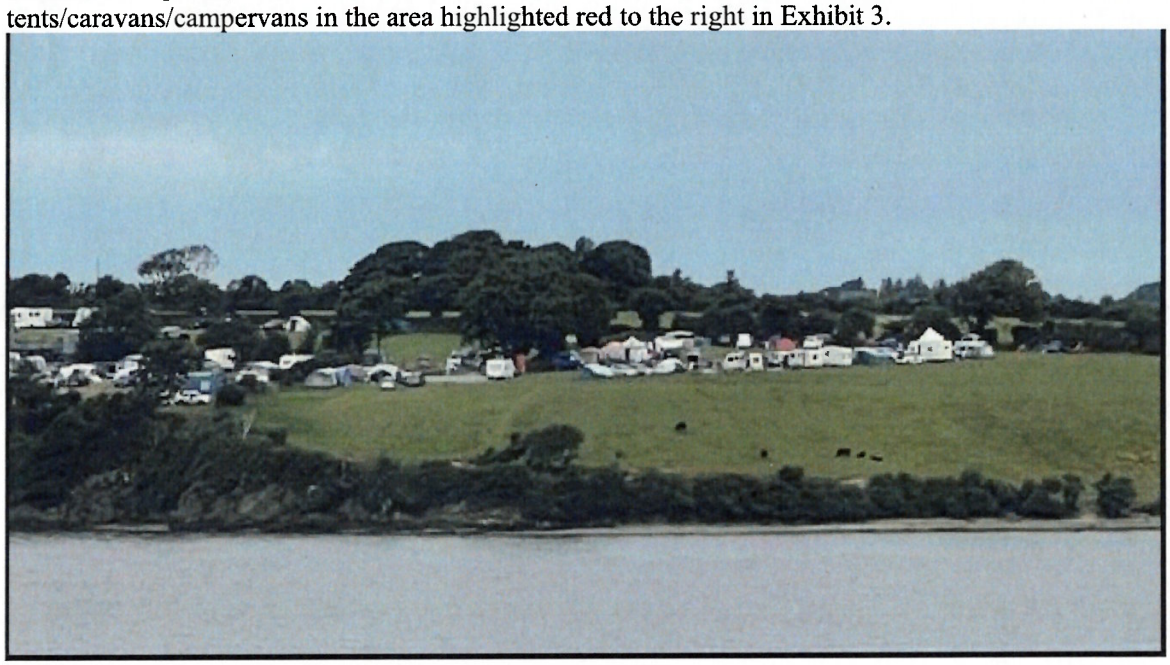

Exhibit 6: expanded area to the south of the site. This is another example of many tents/caravans/campervans in the area highlighted red to the right in exhibit 3.

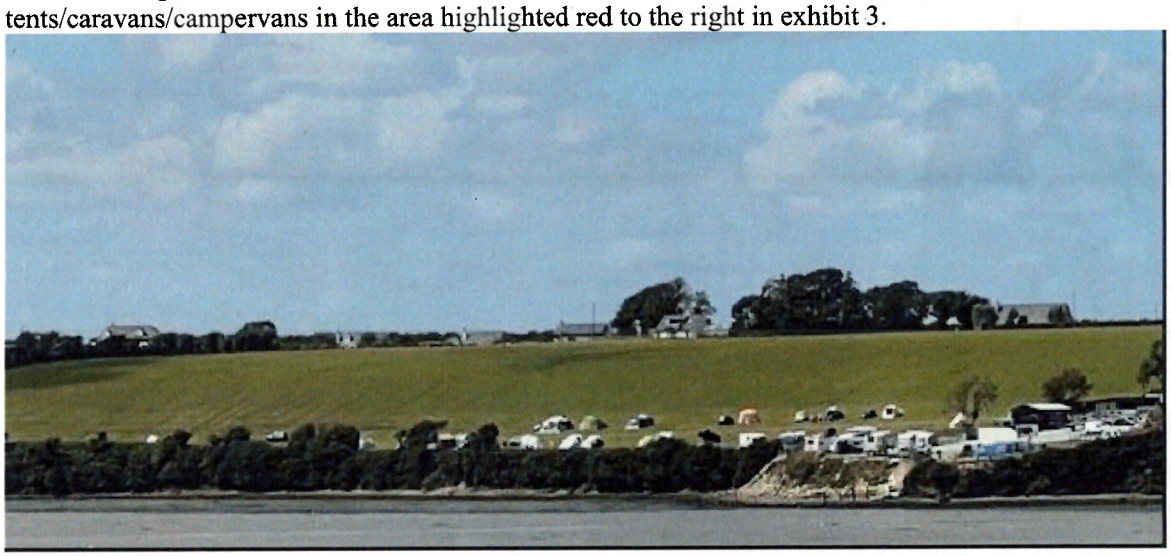

Exhibit 7: The Norman Way viewing point of the Little Sea.

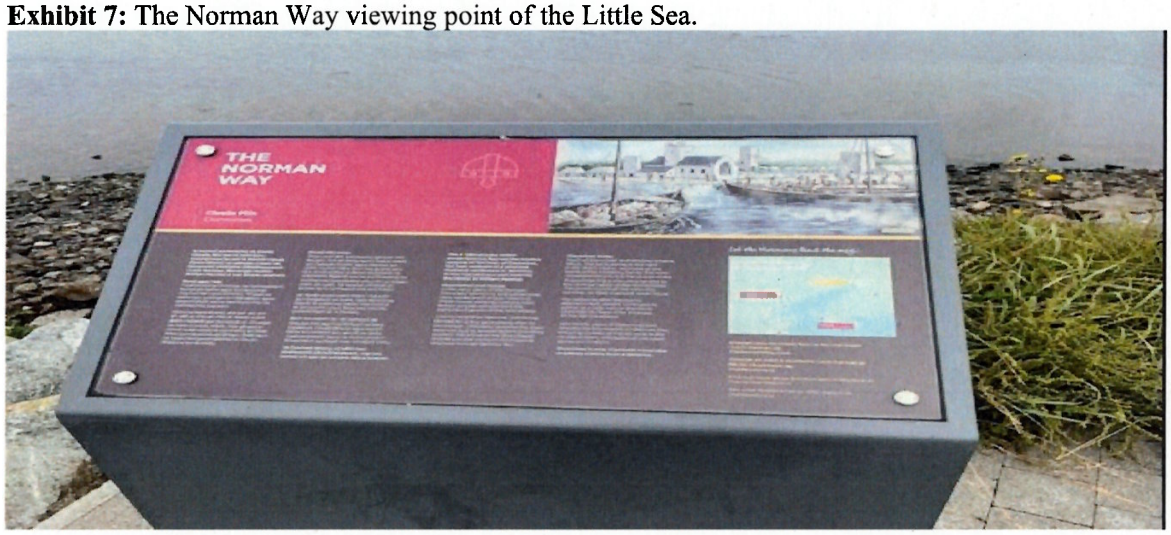

Exhibit 8: Local newspaper article from September 2024 regarding same.

Heritage Week project in Carrig-on-Bannow highlights history of Wexford's cultural heartland

By SIMON BOURKE

Visitors to one of the most historic parts of Wexford will have the opportunity to learn more about that history thanks to a new county council initiative launched to coincide with Heritage Week.

Two information panels have been erected at the Little Sea viewing point in Barrystown on The Norman Way, each offering insight into an area which saw the first Norman settlers in Ireland arrive in the 12th century.

Speaking at the unveiling of the panels, Cathaoirleach of the Rosslare Municipal District (RMD) Councillor Jim Codd said there wasn't a parish in Wexford which could compete with Carrig-on-Bannow now for "culture, heritage, music, language and natural beauty".

"What happened here in 1169 has defined Irish history, the Norman town which sprung up here had 160 families here by the year 1300," said Cllr Codd. "The place names still tell the history, we live in a wonderful place, it's our responsibility to maintain and care for it."

Some of that heritage is depicted on a panel which details the history of mining in the area.

"It relates to mining in Barrystown from the 1540s under the rule of Henry VIII right up until 1960 when the last attempt to glean metals here occurred," said Cllr Codd. "The engine house we see here is a Cornish-design from the 1840s, and works on the engine house and the ongoing uncovering of the rich history of this area have been undertaken by the Barrystown Historical Society.

"I want to thank them most sincerely for their work, we as a council owe a debt of gratitude to them."

The second information panel focuses on the flora and fauna of Bannow, species which are now in all too short supply nationwide.

"The panels depict the beloved brent goose, of which flocks arrive here every autumn from the Canadian High Arctic," continued Cllr Codd who paid tribute to historian Jim Hurley for his work on the project.

"His love and care for the wildlife of south Wexford is something that he's passed on to thousands of students who had the good luck to have him as a teacher."

Further praise went to district manager of the RMD, Ms Nóirín Cummins, a woman who Cllr Codd said was "utterly committed to highlighting the beauty of Bannow".

Jim Hurley, Cllr Jim Codd (cathaoirleach Rosslare Municipal District), Eamonn Hore (Senior engineer, Wexford County Council) and District manager Nóirín Cummins pictured with staff from the Rosslare Municipal District, Assured Services and members of the Bannow Historical Society at the launch of viewing panel Natural Wexford in Bannow. Pic: Jim Campbell

Exhibit 9: The **actual view** from this Little Sea viewing point. The hill and much of the field immediately opposite the Little Sea viewing area is populated by tents/caravans/campervans. This view is also adjacent to the ancient Clonmines castles and church.
This is contrary to the Wexford county development plan in many aspects.

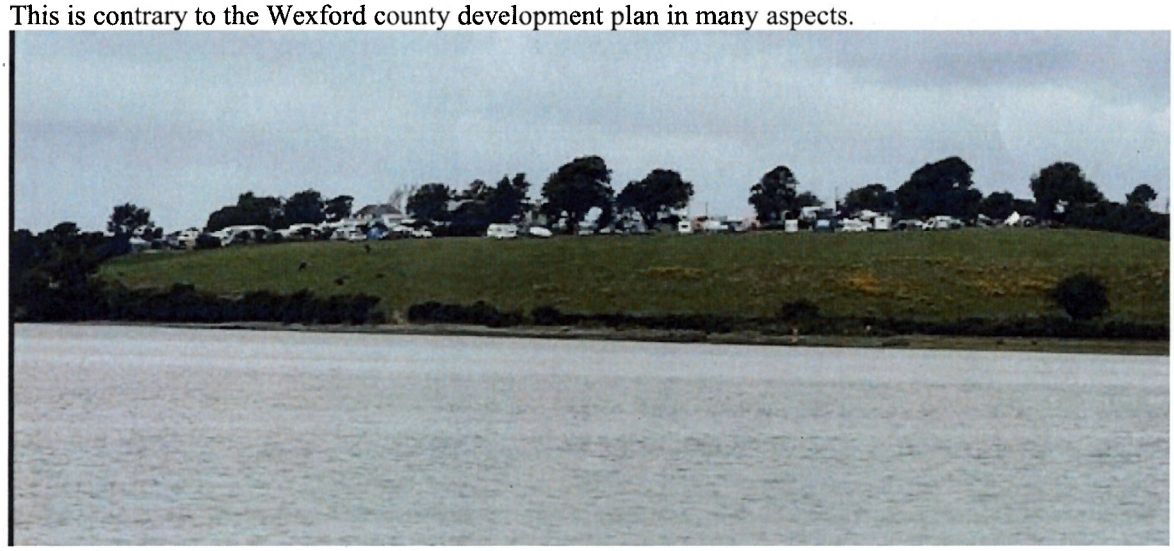

Exhibit 10: 2km zone from the development.
Many residential dwellings are impacted by noise pollution:

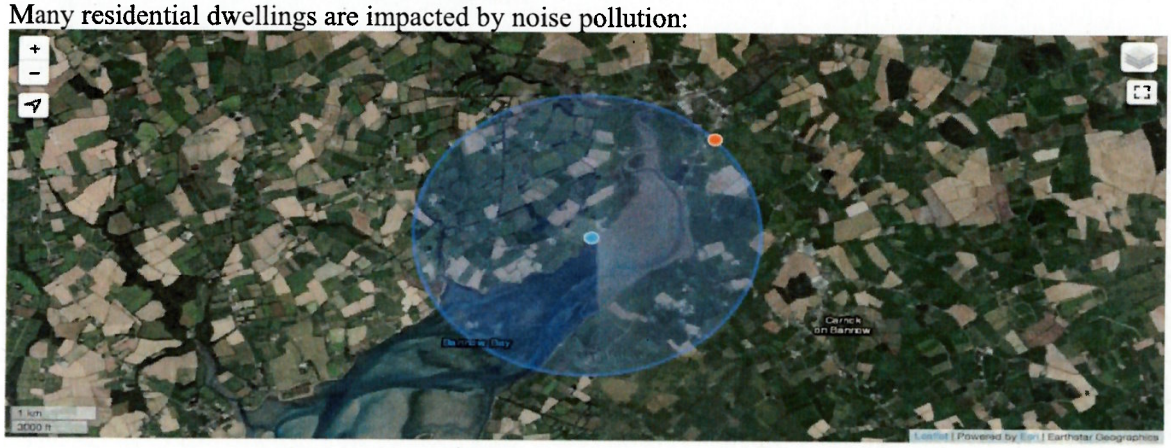

Exhibit 11. Newspaper article touting music "blaring", 2021.

independent.ie

Wexford

Subscribe

John Roche:

Last summer music blared across Roche's Campervan & Campsite in Clonmines as families were reunited, cousins played and barbecue food and beer was enjoyed.

Owner John Roche hopes this can happen this summer. 'It's absolutely mad at the moment but it all depends on this Covid. We've a lot of bookings coming in. When we did open last year it was June 29. Normally we'd open on Paddy's Day. We keep a lot of tents here, more and more last year. We turned away hundreds for the last two years; people from all over the country. We also do campervans and caravans. We don't take that many because they are a lot of work. We have a big field and we put them all into the big field. We've electricity for up to 30 campervans.'

Exhibit 12: Interesting third-party review of the campsite from Google Reviews, highlighting problematic noise levels.

← Roches Campervan and Campsite

Overview Prices Reviews Location Photos Abo

All Property (55) Nature (68) Locatio

Most helpful All reviews

Susan Collier 2/5

3 months ago on Google

Spent 2 nights here, very rustic. The toilets weren't gender separated and not enough of them, cold water only in the toilet block and 2 hand dryers 1 not working 1 barely working. Full bathroom pods in the kitchen area bizarre ! No designated area for grey water. The showers on top of hill were adequate but only 4 for the whole site could have done with double that. No internet and no beach. My biggest problem was the late night revellers in the hard standing area. Kept us awake until 3am despite signage requesting no loud noise after 11pm, this was not enforced. On a positive side the live music on both nights was very good. Staff were pleasant and very helpful. The coffee dock, take out and wine bar well presented. Also extra activities available. We had heard mixed reviews of Roches but decided to make up our own mind. This experience was disappointing and we wouldn't go back.

Trip type Vacation Couple

Service 3.0 Location 2.0

...

Exhibit 13: Large numbers on site. Concerns for visual amenity and safe waste disposal.

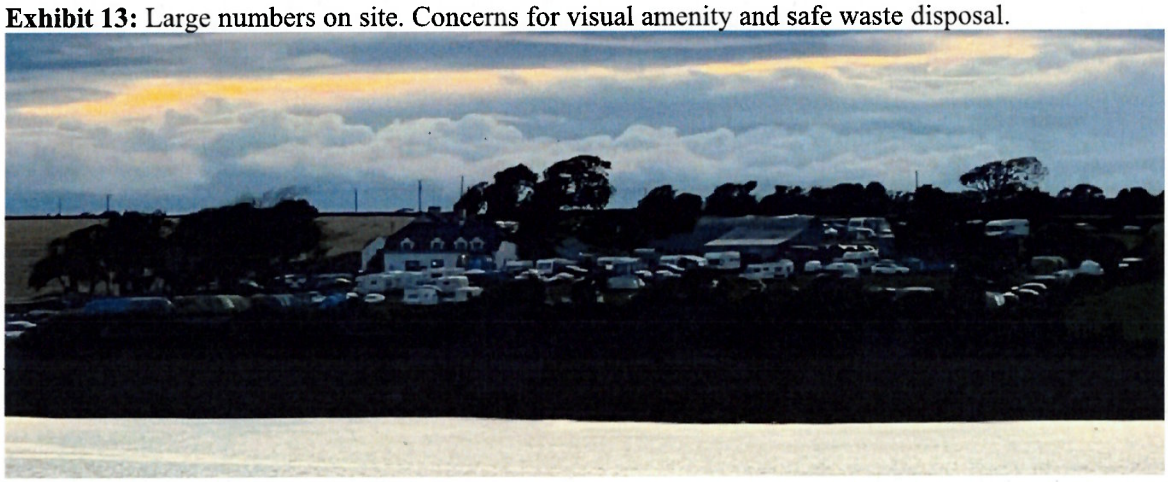

Exhibit 14: Large numbers of site (from the operators Facebook page)

Exhibit 15: Recommendation of Wexford County Council Environment section. This memo is of vital importance and speaks to one of the many material environmental concerns associated with this campsite business.

MEMO: PLANNING SECTION

PLANNING APPLICATION: 20211928

APPLICANT: John Roche

RECOMMENDATION: REFUSAL

With regard to the above application and the further information request by the planning section the following points are noted:

1. This site is subject to a number of investigations under the Water Pollution Act 1977 as amended.
2. Shed A cannot be considered for retention as an Agricultural Shed as it is not designed as an agricultural storage shed. It is designed as a public space and is on inspection in January 2022 still not being used as an agricultural storage shed
3. Shed A currently still contains toilet and washing facilities in the area marked "Storage Area" on drawings submitted.
4. Shed A still currently contains a seating area with sink and refrigeration facilities in the area marked "Agricultural Storage Area" on drawings submitted
5. It is considered that the development poses a very serious risk of pollution to the adjacent shellfish waters in Bannow Bay, which Bord Iascaigh Mhara have informed us is worth in excess of €3 million to the local economy, and which is already under pressure due to a number of water quality incidents.

In view of the above Wexford County Council Environment Section reiterates its view that this planning permission is **Not Granted**

Signed _____ Date _____

Authorised _____ Date 21.2.22

WEXFORD COUNTY COUNCIL
RECEIVED
23 FEB 2022
PLANNING SECTION

Exhibit 16: The below letter is misleading at best. The campsite was operational within a few weeks of this undertaking being provided in writing to Wexford County Council.

20211928

JOHN ROCHE ARCHITECTURAL SERVICES
PLANNING & CONSTRUCTION SERVICES
TEL: 051-568648 MOB: 087-6331420
EMAIL: INFO@JROCHEARCHSERVICES.COM

09 Feb 2022

Planning Dept:
Wexford Co.Council
County Hall
Carricklawn
Wexford

WEXFORD COUNTY COUNCIL
RECEIVED
09 FEB 2022
PLANNING SECTION

ATT. OF: Graeme Hunt

Re: Additional information request for John Roche
At: Clonmines, Tintern
Planning Reg. No. 20211928

Answers to Requests:

1. It is intended to store implements, trailers, bales etc. in these sheds ancillary to the existing farm. The toilets were used for the camper site which was closed down due to the enforcement notice. These toilets have now been decommissioned and sealed up from use as per attached photographic evidence.
2. Shed A has now been sheeted down with timber cladding to simplify the external appearance as per attached photographic evidence. When the weather improves these will be painted accordingly to further reduce the sheds impact at this sensitive location.

Yours Sincerely,
John Roche
John Roche Dip.Arch.

John Roche
Architectural Services
St. Leonards, Ballycullane,
New Ross
Co. Wexford

Phone:
087 6331420
E-mail address:
info@jrochearchservices.com

Exhibit 17: Undesirable precedent – breaches of planning are becoming a more serious issue in county Wexford.

Council investigating 415 alleged breaches of planning regulations

By SIMON BOURKE

THE difficulties in prosecuting those in breach of Wexford County Council's planning laws have been laid bare with a senior official admitting some cases can take years to resolve.

Providing councillors at the New Ross Municipal District (NRMD) with figures for 2024, executive planner Tom Banville said there were 28 planning enforcement cases in Co Wexford before the courts at the end of last year.

Outlining the processes involved in investigating alleged breaches of planning, Mr Banville said his department reviewed all complaints submitted by members of the public and, where applicable, issued warning letters to landowners, developers, or occupiers of land potentially in breach of WCC's planning regulations.

From there, a site inspection is carried out and, if an unauthorised development is discovered, an enforcement notice is issued.

An enforcement notice is an instruction to carry out works to rectify unauthorised development or non-compliance with planning conditions. If that notice isn't complied with WCC will initiate legal proceedings.

Providing additional figures for 2024, Mr Banville revealed that there were 415 live cases under investigation at the end of the year, that 467 warning letters were issued, 238 enforcement notices issued, and four cases were successfully prosecuted in the courts.

However, it was the cases that didn't quite make it to the judge that were of concern to Cllr John Dwyer.

"In terms of resolution on the steps of the court, what is considered an acceptable case resolution?" he asked. "If the council has gone through all the processes, including initiating legal proceedings, incurring significant costs, and then someone says outside the court that they'll comply, is that considered resolved?"

"An enforcement case is resolved when they comply with the enforcement notice," replied Mr Banville. "That notice gives strict direction to the alleged offender to remove the unauthorised development or comply with planning conditions.

Tom Banville, senior executive officer with Wexford County Council.

Unless they comply with the notice we're not going to resolve the case. If it gets to the steps of the court there may be some allowance, in that we may agree on a resolution rather than take it to court.

"It's important to remember that this is a criminal offence and these are criminal cases."

Highlighting a perceived unfairness in the system, Cllr Dwyer said there was an important distinction to be made in these criminal cases.

"But it's not criminal in the sense that the Director of Public Prosecutions (DPP) will be pursuing it," he noted. "If someone agrees to apply for planning permission after an enforcement notice it isn't fair on those who are paying their rates and adhering to the conditions.

IT'S IMPORTANT TO REMEMBER THAT THIS IS A CRIMINAL OFFENCE AND THESE ARE CRIMINAL CASES

There's no account taken for the damage done to legitimate businesses operating."

With some cases within the district still making their way through the system, Cllr John Fleming asked how long, on average, a planning enforcement case took to resolve and how much it costs WCC to resolve them. He was supported by Cllr Michael Sheehan who made reference to a case which appeared to support the theory that many individuals willingly breach regulations and answer questions later.

"There are several cases (in this district), and one in particular on the N25; people went in and dug out a foundation and complaints went in. The house is now built and there's no chance of it ever being taken down. People are asking us why this can't be resolved."

Further evidence came from Cllr Pat Barden who said he was aware of several instances where people had moved onto patches of land and no action had been taken, and one where a group had moved onto a green field site and created accommodation.

"It is a slow process and I realise members of the public and the complainants get quite frustrated by this," answered Mr Banville. "But once we take a case to the court and we're waiting for it to be heard, there's very little more we can do. Cases can be adjourned several times. It can go on for a while, a year, 18 months, or even two years.

"Ideally we want to resolve it before it gets to court."

Confirming that defendants did not pay WCC's legal costs if a case was settled out of court, Mr Banville also said that the council was powerless to investigate cases where a potential breach of planning may be imminent.

"With any complaint we get in relation to a perceived or potential development on a site, we issue a warning letter to the landowner and ask them to respond," he said. "There's a lot of fear about perceived developments, we hear that a lot, we get complaints about developments that are going to happen, but there's nothing we can do about it until it actually happens."

Exhibit 18: The applicants "Biodiversity plan" is not credible:
As can be clearly seen from exhibits 1 to exhibit 6, the campsite operates on a far larger footprint than is outlined in the below graphic contained in the document entitled "Biodiversity Plan", which accompanies this application.
The biodiversity plan therefore lacks any credibility.