

FW: ACP-322985-25

From LAPS <laps@pleanala.ie>
Date Thu 15/01/2026 12:09 PM
To Appeals2 <appeals@pleanala.ie>

 1 attachment (178 KB)

Substitute Consent ACP-322985-25 Wexford.pdf;

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Thursday 15 January 2026 09:18
To: LAPS <laps@pleanala.ie>
Subject: ACP-322985-25

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Good morning,

Please find attached heritage-related observations and recommendations of this Department for the above mentioned consultation.

I should be grateful if you could acknowledge receipt of same.

Kind regards,
Colette

Colette McCormack
Executive Officer

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage

Aonad na nIarratas ar Fhorbairt
Development Applications Unit

Oifigí an Rialtais, Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Government Offices, Newtown Road, Wexford, Co Wexford, Y35 AP90



Your Ref: ACP-322985-25
(Please quote in all related correspondence)

15 January 2026

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email: laps@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended.

Proposed Development: Application for substitute consent under Section 177E of the Planning and Development Act, 2000, as amended for a camping/camp site enterprise at Clonmines, Wellingtonbridge, County Wexford.

A chara,

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated heading.

Nature Conservation

The Department notes that the unauthorised campsite development includes the holding of weekly live music throughout mid-March to September (likely to extend into autumn and winter months if there is demand), lighting of the site, associated and advertised recreational activities such as horse riding, pony trekking, watersports and a looped trail or “shore walk” to name a few associated activities directly linked to this unauthorised development and advertised by the applicant.

The community complex Fine sands with *Pygospio elegans* and *Corophium volutator* community complex of the Qualifying Interest (QI) habitat Mudflats and sandflats not covered by seawater at low tide has already been directly impacted by the unauthorised works. These habitats have been removed and the Natura Impact Statement (NIS) has not assessed this



impact. As such, the NIS is not complete, contains lacunae and does not accurately assess the potential for adverse effects on the Bannow Bay Special Area of Conservation (SAC).

Site specific conservation objectives (SSCOs) for mudflat habitat, including habitat area being stable or increasing has already been contravened by these unauthorised works and the resultant adverse effects of this on the European sites have not been assessed in the NIS. The NIS states that the “Advancement of the proposed development has the potential to indirectly damage part of that habitat”. As the NIS did not adequately assess against SSCO, no adverse effects cannot be concluded with certainty.

It is the Department’s view that adverse effects have already been caused by the unauthorised works and remediation works are required. SSCO for QI Mediterranean and Atlantic saltmarsh habitats, include habitat area being stable or increasing, may be contravened by these unauthorised works from increased visitors to the area due to the unauthorised development and its associated shore walk leading people to these areas. As such, there is potential for additional adverse effects to the Bannow Bay SAC and its QI saltmarsh habitats.

Only a single site visit was conducted on 7 January 2025 by an Ecologist. No bird surveys were carried out to inform the NIS regarding SCI bird species of Bannow Bay Special Protection Area (SPA), or the adjacent Kiltra subsite of Bannow Bay.

No data request to BWI or this Department was mentioned to inform the NIS. As such, there is a lack of recent data on the SCI bird usage of Bannow Bay SPA and Kiltra subsite.

The NIS does refer to recent reports and highlights how very important numbers of SCI bird species use Kiltra, the area of the Bay adjacent to the site, making it one of the most important subsites in Bannow Bay.

The Bannow Bay SPA SSCO refer to habitat area for the SCI bird species to be stable or increasing with no decrease in range, timing or intensity of use of areas by these birds. As the unauthorised development includes live music events, lighting, significant increase in human activities etc., this SSCO is being/will be contravened into the future, resulting in adverse effects to the SPA.

The NIS has not adequately assessed the impacts of disturbance to feeding and roosting SCI bird species of the Bannow Bay SPA. Potential significant disturbance impacts have the potential to significantly contravene relevant site specific conservation objectives (SSCOs).



The Zone of Influence is mapped as 500 metres from the site, however noise and light pollution can easily exceed this distance in terms of their potential for significant effects to the relevant SCIs/QI species, such as feeding or roosting waterbirds.

The NIS has not adequately assessed the impacts of a potential reduction in water quality to QI habitats of the Bannow Bay SAC and Bannow Bay SPA.

Activities Requiring Consent (ARCs) are listed in the NIS, however as the activities are brought about and increased by the unauthorised development, the ARCs are irrelevant and these activities are a matter for the substitute consent application as they are associated with the development and therefore, an associated impact needed to be assessed by the NIS. This has not been done.

Due to the increased footfall being brought to and directed to the shoreline of Bannow Bay from this development, there is also an increased risk of spreading invasive species such as *Spartina* or Japanese knotweed within the SAC and SPA, which has the potential to result in adverse effects.

No Ecological Impact Assessment (EclA) was done to assess other sensitive biodiversity such as otter, bats, roosting birds of prey or flora protection order species in this area.

The proposed biodiversity measures are not considered suitable or adequate to mitigate against potential adverse effects on Bannow Bay SAC or Bannow Bay SPA from disturbance or habitat loss. In fact the proposal to develop a nature walk adjacent to the shoreline is likely to increase these impacts for the reasons outlined.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie, or to the following address:

The Manager, Development Applications Unit (DAU)
Government Offices, Newtown Road
Wexford, Y35 AP90

Is mise, le meas

Colette McCormack
Development Applications Unit, Administration