



An
Coimisiún
Pleanála

Inspector's Report PL-500303-WX-25

Development	Permission for retention of a sauna facility including a single mobile sauna, a booking kiosk, a changing area and all associated site works.
Location	Doogans Warren, Coast Road, Rosslare strand, Co. Wexford.
Planning Authority	Wexford County Council
Planning Authority Reg. Ref.	20251085W
Applicant(s)	Helios Sauna Ltd.
Type of Application	Permission for retention
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party
Appellant(s)	Helios Sauna Ltd
Observer(s)	One-Sabina Purcell
Date of Site Inspection	2 nd day of March 2026
Inspector	Fergal Ó Bric

1.0 Site Location and Description

- 1.1 The subject site has a stated area of 0.042ha and is located within the sand dune system immediately adjoining Rosslare Strand and the Irish Sea. The subject site faces directly onto Rosslare harbour, and the Rosslare Europort is clearly visible across on the opposite side of the harbour area. There are sand dunes located north and south of the structures sought to be retained and the Rosslare strand is located east of the subject site. Ground levels rise from east to west within the site and significantly to the western site boundary which comprises a steep embankment up towards the cliff roadway/walkway that overlooks the site.
- 1.2 The site is accessed from pedestrian beach access steps which connect the Coast Road down to the Rosslare Beach with the subject site being towards the lower end of the steps before the beach area is reached. There is a short, concreted pathway at the northern end of the site and an open walled changing area with wooden benches where swimmers/bathers can change and further south within the site are the booking kiosk and sauna facility structures. The sauna structure is located on an area of hardstand which is stated to be associated with two military canon structures which are facing towards the sea and located each side of the sauna facility.
- 1.3 Access to the sauna facility and booking kiosk is freely available with no fencing or access gate to the appeal site from the beach or adjoining beach access steps. The sauna is housed in a caravan type trailer on a triple axel with a hitching mechanism attached. The sauna is not visible from the Coast Road; however, the sauna and kiosk are visible from dedicated viewing/information board areas along the Cliff Road walkway immediately west and above the subject site. There is signage advertising the sauna facility at the top of the beach access steps at the junction of the Coast and Cliff top roads and also at the entrance to the facility at the bottom of the beach access steps. The site also contains a walled changing area with wooden benches and a metal booking kiosk structure.
- 1.4 A letter of consent from the landowner to the applicants consenting to the making of the retention planning application on his lands has been submitted by the applicants.

2.0 Proposed Development

2.1 Permission is sought to retain the following:

- A sauna facility including a single mobile sauna with a stated gross floor area of 8.7 square metres,
- A booking kiosk with a stated gross floor area of 6 square metres,
- A changing area and all associated and ancillary works

3.0 Planning Authority Decision

3.1 Decision

Refuse permission for retention for five reasons which can be summarised as follows:

- 1- Universal access not taken into consideration and would be contrary to specific objectives TM18 and CZM22 within the current Wexford County Development Plan 2022-2028.
- 2- The structures have been placed in a highly visually sensitive amenity location and would be contrary to specific objectives LO4, LO6, LO7 and LO10-12 within Volume 7 of the current Wexford County Development Plan 2022-2028.
- 3- The development is located within an existing historical amenity area and restricted access to the public by the installation of commercial structures on the site and would be contrary to specific objectives ED11, ED52, ED68 and L10-12 within the current Wexford County Development Plan 2022-2028.
- 4- The development has not been designed nor sited to comply with Council objectives in relation to management of the coastal zone and would be contrary to specific objectives CZM1-3, CZM30, CZM34 and CZM43 within the current Wexford County Development Plan 2022-2028.
- 5- Insufficient information has been submitted in relation to the management of water on and off site and would be contrary to public health and the proper planning and sustainable development of the area.

3.2 Planning Authority Reports

3.2.1 Planning Reports

The Planner's Report noted the context of the site, the third-party submissions; the departmental reports; and the Development Plan policy context. The Planner accepted that the principle of the use would be acceptable within the settlement of Rosslare Strand, but that this highly visible and sensitive location within the sand dunes would not be acceptable from a landscape, universal access and coastal zone management perspectives and that the proposals would be premature pending the finalisation of a coastal erosion flood relief study currently being prepared by Wexford County Council in conjunction with the Office of Public Works. The proposals are, therefore, considered to be contrary to the proper planning and sustainable development of the area.

3.2.2 Other Technical Reports

- Coastal Engineer – Refusal of permission recommended as the subject site is within an identified coastal erosion risk area of soft coastline, would be contrary to coastal zone management policy objective CZM34 and the proposal would be premature pending the completion of the Rosslare Coastal Erosion Flood Relief Scheme which is presently underway.
- Roads Department – no objection
- Disability Access Officer-While a Disabled Access Certificate (DAC) is not technically required for a temporary structure, best practice would be to ensure that universal access is provided to/from the site.

3.3 Prescribed Bodies

- Marine Area Regulatory Authority (MARA)-They state that the subject site appears to be above the High Water Mark (HWM) and, therefore, a Marine Area Consent (MAC) would not be required in this instance.

3.4 Third Party Observations

One observation was received by the Planning Authority which raised a number of issues as follows:

- A letter of consent from the landowner has been provided. No evidence of land ownership in terms of land registry mapping or folio numbers has been provided.
- Climate change has to be considered especially as Rosslare Strand has experienced significant coastal flooding in recent years.
- No information in terms of potential impact upon wintering birds or pollinating bees has been provided by the applicants.
- There is no reference to coastal erosion within the AA Screening report submitted by the applicant.
- The cliff embankment to the rear (west) of the site is fragile with the removal of some of the supporting grasses to cater for the development sought to be retained.
- Universal access to the facility has not been provided for.
- There are no toilet facilities provided on site nor in the vicinity of the subject site.
- Details of opening hours have not been provided. The facility has been known to stay open until 10pm with loud music emanating from it.
- The sand dunes are being adversely impacted by patrons entering and exiting the sauna facility.
- No details of water collection and disposal from the sauna facility have been provided.
- The subject site is located within a heritage area associated with the military gun battery area.
- The sauna and booking kiosk are obstructing views to/from the sea and from the viewing platforms.

- The container where there are logs and fuel stored to serve the sauna is a potential fire hazard.
- The sauna facility will generate litter and attract anti-social behaviour.
- The site is not a brownfield one but is a long-standing local heritage site.
- Unauthorised works have been carried out in the form of signage and the erection of posts and rope fencing.
- No details of how the sauna trailer and booking kiosk container were installed on site have been provided.

A number of local residents signed a petition in support of the sauna development.

4.0 **Planning History**

I am not aware of any relevant planning history pertaining to the subject site.

5.0 **Policy Context**

5.1 **Wexford County Development Plan 2022-2028**

Volume 1-Written Statement:

Chapter 6: Economic Development Strategy

The following are considered to be the relevant written statement and specific policies and objectives within the current Development Plan:

ED11: To protect the natural resources, amenities and heritage of our county and ensure that economic development does not significantly impact on this heritage, the environmental capacity or on the amenity of the residents of the county.

ED52: To ensure that all planning applications for new development achieve a high standard of design in terms of contribution to the streetscape, layout, architectural design, building format, materials, finishes, conservation of features of architectural and historical merit and high-quality public realm. All future development should make a positive contribution to the distinct identity of its settlement and succeed in enhancing a sense of place.

ED53: To promote the re-use and regeneration of vacant buildings and the regeneration of obsolete and/or under-utilised buildings and lands that could yield economic benefits with appropriate uses, subject to the proper planning and sustainable development of the area.

Chapter 7-Tourism Development

TM01: To protect and sustain the natural, built and cultural features that form the basis of the county's tourism industry including landscapes, historic buildings and structures, habitats, species and areas of natural heritage value and water quality.

TM02: To facilitate, where appropriate, proposals to improve access for all at existing tourism sites and facilities, and to require all new tourism related developments to ensure the development is accessible to everyone, regardless of their age, size or ability.

TM13: To ensure that new tourism development is sustainable in terms of use of resources and resilient in terms climate change.

TM14: To support and develop our towns and villages and rural heritage sites including our beaches for tourism purposes through the facilitation of links by public transport, greenways, blueways and associated infrastructure subject to compliance with the Habitats Directive and normal planning and environmental criteria.

TM18: To develop and maximise the tourism potential of the county by facilitating the appropriate expansion of existing and the provision of new universally accessible sustainable tourism attractions, facilities and infrastructure in towns and villages while ensuring the protection of the environment and subject to compliance with normal planning and environmental criteria.

TM23: To ensure that tourism development or activity does not impact on coastal habitats, species and features such as wetlands and vegetated dunes which play an important role in flood relief and in protecting from coastal erosion and are important in their own right.

TM24: To ensure that tourism development in coastal areas is sensitively designed and considers views from scenic routes, paths and trails and from the popular sea transport routes.

TM25 To facilitate development which would improve tourism potential and tourist numbers, such as marinas, sea angling, sailing, marine adventure activities, diving and surfing and beach nourishment at appropriate locations in accordance with this chapter and Chapter 12 Coastal Zone Management and Marine Spatial Planning and subject to compliance with the Habitats Directive and normal planning and environmental criteria.

TM32: To consider the development of small-scale complimentary facilities and businesses along greenways, blueways and walking trails such as bicycle hire, cafés, craft and design shops, pubs and restaurants subject to compliance with the Habitats Directive and normal planning and environmental criteria. These facilities and businesses should be located within existing settlements so that they are easily accessible to both users of the routes/trails and the wider public. Consideration will also be given to the use of traditional and agricultural buildings for commercial purposes along these routes in accordance with Section 7.6.2 Rural Based Tourism.

Chapter 9-Infrastructure

Section 9.11-Flood Risk and Surface Water Management

Objective FRM07

To ensure that all future development proposals comply with the requirements of the Planning System and Flood Risk Management –Guidelines for Planning Authorities (DEHLG and OPW, 2009) and Circular PL2/2014, in particular through the application of the sequential approach and the Development Management Justification Test. In this regard, the Planning Authority will apply the precautionary principle and will screen all proposals for flood risk and will pay particular attention to lands within, along the edge or adjacent to Flood Zone A or B.

Objective FRM08

When potential flood risk is identified in either Flood Zone A, B or C, the Planning Authority will require the applicant to submit an appropriately detailed site-specific flood risk assessment. The assessment, which shall be carried out by a suitably qualified and indemnified professional, shall be appropriate to the scale and nature of the risk to the proposed development, and shall consider all sources of potential

flood risk including, where relevant, fluvial, coastal, surface water/pluvial and groundwater sources. The assessment shall be fully in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (DEHLG, OPW 2009) and the Strategic Flood Risk Assessment in Volume 11 of the County Development Plan and the requirements set out therein, and shall address climate change, residual flood risks, avoidance of contamination of water sources and any proposed site specific flood management measures.

Chapter 10: Environmental Management

WQ15: To ensure that development permitted would not negatively impact on water quality and quantity, including surface water, ground water, designated source protection areas, river corridors and associated wetlands, estuarine waters, coastal and transitional waters.

Chapter 11-Landscape and Green Infrastructure

L01: To have regard to the Landscape Character Units and their assigned Landscape Sensitivity, the Draft Landscape and Landscape Assessment-Guidelines for Planning Authorities (2000) and any updated versions of these guidelines published during the lifetime of the Plan, and any National Landscape Character Assessment prepared when assessing planning applications or when carrying out local authority own development.

L04: To require all developments to be appropriately sited, designed and landscaped having regard to their setting in the landscape, ensure that any potential adverse visual impacts are minimised and that natural features and characteristics of the site are retained.

L06: o 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.

L11: To protect views worthy of protection, including views to and from the sea, rivers, landscape features, mountains, tourism sites and landmark structures such as bridges and urban settlements from inappropriate development that by virtue of

design, scale, character or cumulative impact would block or detract from such views.

L12: To protect planned views and vistas, such as those that might be associated with planned settlements, heritage properties and monuments and ensure that new development does not detract from such views as may be identified within towns, formal settings and designated landscapes. In evaluating planning applications for development in the foreground of such views and vistas, consideration shall be given to the effect such development may have on the view or prospect.

L13: To consider the special qualities of the landscapes listed in Section 4.0 Other Landscape Considerations in Volume 7 Landscape Character Assessment when assessing development proposals in these areas. In assessing impacts the Council will consider the specific landscape qualities for which they have been designated.

Chapter 12-Coastal Zone Management

CZM01: To ensure the sustainable development of the county's coastal areas and the maritime area for the long-term benefit of coastal communities and the economic well-being of these areas and the county whilst protecting and enhancing environmental quality and managing and restoring biodiversity.

CZM03: To maximise the economic development potential of the county's coastal and maritime areas subject to compliance with the objectives of the County Development Plan with regard to the location of economic development, the protection of the scenic amenity and views associated with coastal areas and the maritime area which is crucial to the tourism industry, the protection of the amenity, livelihood and cultural well-being of coastal communities, the protection and restoration of coastal features, habitats and species, compliance with the Habitats Directive and normal planning and environmental criteria and the proper planning and sustainable development of these areas.

CZM21: To support proposals for new development or activities in coastal and maritime areas that enhance or promote social benefits for the local communities, and where considered necessary an applicant will be required to demonstrate that

adverse impacts on local communities will be avoided, mitigated or minimised appropriately.

CZM22: To require developments that will be used by the public to be universally accessible to ensure that everyone enjoys equal access regardless of their age or ability.

CZM25: To have regard to the potential impacts of climate change in the future land use plans and the assessment of planning applications in the coastal zone and maritime area.

CZM30: To carefully consider development proposals in areas identified at risk of coastal erosion, which include but are not limited to Kilpatrick, Ardamine, Glascarrig, Killincooly to Ballinesker, Rosslare, Tacumshin to Kilmore Quay, Ballyteige Burrow to Cullenstown and Fethard, and areas where coastal defence works are in place but confidence rate are low including but not limited to Courtown, Pollshone, Cahore, Blackwater and Rosslare.

CZM34: Within coastal settlements located on a soft shoreline or where there is an identified area of coastal erosion risk, the Council will consider the development of buildings or uses (including caravans or temporary dwellings) where there are existing coastal protection works in place or these works are underway. In order for the development to be considered:

- a. The development must not extend the length of the coastline that would require additional coastal protection works.
- b. The applicant must objectively establish based on the best scientific information available at the time of the planning application that the likelihood of erosion at the location is minimal taking into account, inter alia, the effectiveness of the existing coastal protection works and any potential impacts of the proposed development on erosion or deposition.
- c. The onus will be on the applicant to provide the evidence (including appropriate modelling which incorporates climate change) to demonstrate that the development will not be at risk over its lifetime. The Planning Authority will have regard to recent and historic trends and events and the data sources referred to in Objective CZM29 in assessing such applications.

- d. The applicant must also demonstrate that the proposed development will not pose a significant or potential threat to coastal habitats or features and is compliant with the Habitats Directive.
- e. This objective will not apply to minor extensions to existing buildings.

CZM40: To protect the environmental quality of our coastal and maritime areas by ensuring that new developments do not detract from water quality and ensuring that wastewater treatment and non-point sources are appropriately located.

Chapter 13-Heritage and Conservation

HT03: To promote initiatives that provide better public access for all visitors to our historic built and natural environment whilst ensuring the full protection of these sites. Wexford County Council will ensure that decision making on projects/developments to improve access, and facilities are informed by an appropriate level of environmental assessment.

NH05: In assessing planning applications located in and/or in proximity to Natura 2000 sites, whether hydraulically linked or otherwise linked or dependent (such as feeding, roosting or nesting grounds) to a designated site, regard shall be had to the detailed conservation management plans and data reports prepared by NPWS, where available, to the identified features of interest of the site, the identified conservation objectives to ensure the maintenance or restoration of the features of interests to favourable conservation status, the NPWS Article 17 current conservation status reports, the underlying site specific conditions, and the known threats to achieving the conservation objectives of the site.

NH08: To ensure that any plan/project and any associated works, individually or in combination with other plans or projects, are subject to Screening for Appropriate Assessment to ensure there are no likely significant effects on any Natura 2000 site(s) and that the requirements of Article 6(3) and 6(4) of the EU Habitats Directive are fully satisfied. Where a plan/project is likely to have a significant effect on a Natura 2000 site or there is uncertainty with regard to effects, it shall be subject to Appropriate Assessment. The plan/project will proceed only after it has been

ascertained that it will not adversely affect the integrity of the site or where, in the absence of alternative solutions, the plan/project is deemed by the competent authority imperative for reasons of overriding public interest.

BH01: To protect the architectural heritage of County Wexford and to include structures considered to be of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest in the Record of Protected Structures.

BH14: To ensure that elements of the architectural heritage of the county, such as historic gardens and historic designed landscapes, stone or brick walls.

Volume 2: Development Management Standards

Section 5.7.1 Tourist Attractions

Consideration will be given to permitting a limited number of such developments provided they do not conflict with other strategic objectives in the Plan including Section 7.6.2, Section 7.7.4 and Section 7.7.5 in Volume 1 Chapter 7 Tourism Development and the associated objectives and meet the following minimum requirements:

- The development consists of a well-researched, justified and imaginative integrated project.
- The development does not contravene the landscape and coastal zone management objectives in the Plan.
- The development relates sympathetically to the scale and level of activity in the locality.

Volume 3: Settlement Plans and Specific Objectives

Section 4: Rosslare Strand specific objectives

Section 4.3.7 Vacancy and Under-Utilised Land

A number of sites have been identified as being in need of regeneration.

4 vacant retail units were identified

Section 4.4.2 Core Strategy Development Approach

Additional Strategic Objectives specific to Rosslare Strand include:

- To ensure flood risk is effectively managed and that development is avoided on lands identified at risk of flooding.
- To avoid contributing to coastal erosion and support appropriate mitigation measures.
- To protect and enhance coastal habitats and species within and adjacent to the settlement.

Section 4.4.4 Access for All and Age Friendly Development As discussed in Section 4.3.2, 21.5% of the settlement's population was over 65 years old in Census 2016.

Objective RS01 To ensure the future planning of the settlement addresses the needs of all users and residents, including older people. The principles of universal access for all will be applied to all developments including public realm and environmental improvements carried out by the local authority or local community groups in the settlement.

Objective RS04 To consolidate the existing built environment in a manner that enhances the coastal setting and character of the area.

Objective RS13 To prioritise the development of vacant, infill and under-utilised brownfield sites in the settlement plan area to achieve compact growth and sustainable development.

Section 4.4.10 Economic Development

This will be based around the following goals:

- To encourage tourism-related development at appropriate locations in the plan area.
- To ensure that new or expanded tourism developments respect the natural and built environment so that they do not damage the feature(s) that has attracted the visitor to the area in the first instance.

- To facilitate developments that may add to the tourism product, extend the tourist season and/or increase accessibility to attractions and facilities such as the development of the coastal path subject to compliance with normal planning and environmental criteria and compliance with EU Directives.

Objective RS29 To ensure Rosslare Strand maintains and enhances its role as a valuable tourism destination in the county and to facilitate the development of appropriate tourism facilities, subject to normal planning and environment criteria and the development management standards contained in Volume 2.

Objective RS38 To protect views and the coastal zone.

Objective RS43 To ensure development is in accordance with the objectives outlined in Volume 1 Chapter 12 Coastal Zone Management and Marine Spatial Planning.

Objective RS44 To support the monitoring of coastal erosion in and adjoining the settlement and the carrying out of appropriate remedial action where appropriate and subject to compliance with all relevant EU and national legislation and guidance and normal planning and environmental criteria.

Section 4.4.13 Surface Water, Flooding and Erosion

Objective RS50 To ensure that new development is avoided in areas at risk of coastal erosion to the greatest extent practicable.

Objective RS52 To only consider developments where they will not result in an increase in coastal erosion, either at the subject site or at another location in the vicinity subject to compliance with relevant EU and national legislation and guidance and all other normal planning and environmental criteria.

Volume 7: Landscape Character Assessment:

The subject site is located within the Coastal landscape where the following is set out: 'The coastal areas of Wexford experience greater pressure for tourism and residential development and are very sensitive to development and require protection both in their own right and for the services and economic benefits they bring'

Coastal landscapes have a High Sensitivity to change and a limited ability to absorb new development. Development proposed within these areas must be shown not to

impinge in any significant way upon their character, integrity or uniformity when viewed from the surroundings. Particular attention should be given to the preservation of the character and distinctiveness of these areas as viewed from scenic routes and the environs of archaeological and historic sites.

5.2 Natural Heritage Designations

The subject site is not located within any designated European site. However, there are a number of European sites in close proximity to the subject site including the Seas off Wexford SPA (site code 004237) which is located approximately 35 metres east of the subject site. The Wexford Harbour and Slobbs SPA (Site Code 004076) is located approximately 1.17 kilometres west of the appeal site.

The Wexford Slobbs and Harbour are also a proposed Natural Heritage Area (Site Code 000712) and is located approximately 1.17 kilometres west of the appeal site.

5.3 Environmental Impact Assessment - Screening

Please see Appendix 1 at the end of this planning report. Having regard to the relatively modest nature of the development and notwithstanding its location immediately adjacent to Rosslare Strand and the Irish Sea, there is no real likelihood of significant adverse effects on the environment. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

5.4 Water Framework Directive Screening

The subject site is located within a sand dune area adjoining the beach within the designated settlement of Rosslare Strand on the south-east coast of Wexford. The Irish Sea is located approximately 35 metres east of the subject site and in closer proximity to the subject site during high tide. The subject site is immediately adjacent to the coastal waterbody of Rosslare Bay.

The development seeks permission for the retention of a commercial sauna facility and ancillary booking kiosk facility, a changing area and all associated site works.

I have assessed the development and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface & ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment as I consider there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively.

The reason for this conclusion is as follows:

- the modest scale and nature of the development
- the distance from the nearest water bodies and the absence of hydrological connections.

Conclusion

I conclude that on the basis of objective information, that the development does not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

6.0 The Appeal

6.1 Grounds of Appeal

A first party appeal has been received from the applicants against the decision of the Planning Authority to refuse permission for retention of the sauna development. The issues raised within the appeal submission are summarised as follows:

Principle of Development:

- Rosslare strand is designated as a level 3(a) service settlement as per Settlement Strategy within the current Wexford County Development Plan (WCDP).
- Section 3.6.3 of the Plan identifies the main function for the settlement as being for 'Tourism Development'

- The sauna facility has regenerated and redeveloped an underutilised brownfield site providing for a small-scale leisure facility which the local community and visitors can enjoy.
- The settlement of Rosslare Strand has no specific land use zoning objectives and is located within a coastal zone as per Volume 7 (Landscape Character Assessment), Map 3 within the current WCDP, where it has a sensitivity rating of 'high'.
- The subject site is not located within an Architectural Conservation Area, nor within an area of archaeological remains nor within any of the designated European or natural heritage sites.
- Rosslare strand is identified as a 'designated bathing area' as per table 12.2 of the current WCDP.

Response to Refusal Reason Number 1:

- The first reason for refusal references two specific policy objectives namely TM18 and CZM22 which both seeks to promote development that would be universally accessible attractions.
- The access to the sauna facility is provided along Rosslare strand, an identified recreational facility is accessed by a number of steps from the Coast Road and are in the ownership of the Local authority and these steps do not provide for universal access.
- The sauna facility is a modular/demountable structure and does not require compliance with Part M of the Building Regulations, regarding disabled access.
- The Disability Access Officer within Wexford County Council in their report acknowledged that a disabled access Certificate is not required for the sauna facility.

Response to Refusal Reason Number 2:

- The second reason for refusal references a number of specific policy objectives pertaining to landscape protection as set out within Volume 7 of the WCDP.

- The development is well sited and does not give rise to any significant landscape or visual impacts, due to its modest scale.
- A detailed landscape and visual impact assessment (LVIA) report was submitted a part of the planning documentation namely TM18 and CZM22 which both seeks to promote development that would be universally accessible attractions.
- The LVIA concludes that ‘there is very little visual impact arising from the Helios sauna development. The one point from where it is quite visible is from above from the cliff walk. The sauna is temporary in nature and is easily removed...there is something of a change of character which can be mitigated. These mitigation measures including outlining and indicating the footprint of the former military architecture and including planters with enriching biodiversity friendly pollinators...visually integrating the kiosk into the dune system will benefit landscape and visual receptors at a local level. Taking all measures in the round, the landscape and visual impacts will be slight to negligible’.
- A key feature of the development is its co-location with a designated swimming/bathing area, which facilitates sea swimmers to utilise the sauna facility.

Refusal reason Number 3:

- The third reason for refusal references a number of specific policy objectives pertaining to economic development as set out within the current WCDP.
- The area around the sauna facility is concreted and there are remnants of two salvaged military canons which remain in place.
- This area was previously in a poor condition and subject to anti-social behaviour.
- The sauna facility delivers passive surveillance and making this area safer and provides an amenity during daytime and evening time, particularly in the peak tourist season and at weekends throughout the year.

- The sauna structure has a minimalist contemporary design with a timber clad finish and is flanked by dunes and an embankment to the area, ensuring that it does not impact on the skyline when viewed from the beach.
- Letters of support have been provided from local people and a group of local sea swimmers.

Refusal Reason Number 4:

- The fourth reason for refusal references a number of specific policy objectives pertaining to Coastal Zone Management as set out within the current WCDP.
- The structure is located within an area above the high-water mark and would not give rise to an additional risk of coastal erosion.
- CFAMS mapping indicates that the subject site is located outside of the flood risk extents for coastal flooding.
- The development does not give rise to any negative impacts upon habitats or any risk of adverse impact upon European sites.

Refusal Reason Number 5:

- The fifth reason for refusal relates to the insufficient level of information regarding the management of water on and off the site and being contrary to public health and the proper planning and sustainable development of the area.
- The only water used within the facility is used internally for cleaning purposes.
- Non-biological cleaning products are used internally to wipe down surfaces.
- Any excess water generated internally is gathered using a mop/sponge and disposed of to the wastewater drainage network.
- There is no water draining to ground or flowing from the site/sauna facility.
- The hardstanding area on which the mobile sauna facility is located was already in existence prior to the positioning of the sauna facility on site. The

development has not created additional impermeable surfaces in the context of storm or surface water.

- There are no WC facilities on site. There are public restrooms located approximately 400 metres north of the subject site along the Coast Road.

6.2 Planning Authority Response

None received.

6.3 Observations

A third-party observation was received. The issues raised within the observation can be summarised as follows:

- This part of Rosslare Strand has been designated by Wexford County Council as being vulnerable to coastal erosion.
- The sauna and kiosk structures have been placed on a site of historical importance to Rosslare.
- Details of title or rights of way over the subject site which have been enjoyed by local residents and visitors for decades on this heritage site have not been provided.
- The sauna cannot be described as a community facility, as it is part of a commercial profit-making business.
- The site is not a brownfield one as contended by the applicants.
- The refusal of permission for retention by the Planning Authority related to adverse environmental impacts, public access issues, compliance with coastal management objectives and the importance of maintaining the integrity of this vulnerable coastal area for public use and for environmental protection.
- The County Development Plan is specific in requiring that development proposals do not adversely impact the local coastal environment.

- Wexford County Council are seeking to ensure Rosslare Strands' vulnerability to coastal erosion is not adversely impacted by development.
- The creation of a pedestrian track at the back (west) of the sauna facility which accesses onto the public pedestrian access to the beach has resulted in the removal of grasses which are important for the structure of the sand dune system and contributed to coastal erosion
- The sauna and kiosk structures do not satisfy the Local Authority's (LA's) objectives of minimising coastal erosion.
- The assessment carried out by the planning officer was comprehensive and the provisions of the Development Plan were taken fully into consideration.
- The assessment submitted by the applicants confirms that the subject site is located in close proximity to the Wexford Seas SPA.
- The sauna and booking kiosk are visible from the viewing platform areas on the Cliff Road immediately west of and above the subject site.
- There are other more suitable locations within the settlement of Rosslare Strand to locate a sauna facility where much less risk to the local environment would arise.
- The Coimisiún are requested to consider the content and provisions of a number of local policy documents including the current Wexford County Development Plan 2022, the Wexford Climate Action Plan 2024, the Rosslare Coastal Flood and Erosion Risk Management Plan 2019 and an Environmental Report prepared by a Consultant Engineering Firm in June 2025.
- Universal access to the sauna facility is not available.
- Wexford County Council provides Beach wheelchair information and a booking sheet for use of the beach wheelchair.
- The sauna puts additional pressure on the limited parking spaces available in this area.
- The sauna is visually obtrusive within this local environment.

- The sauna facility adversely impacts the structural integrity of the sand dunes and the embankment to the west of the sauna and kiosk structures.
- There are no toilets available for staff or patrons of the sauna facility. The nearest accessible public toilet is located approximately 650 metres north of the subject site.
- No details of how fuel/wood is delivered to the site to heat the sauna or how the ash is disposed of after the burning of fuels on site have been provided.
- Adverse air quality impacts arising from the wood fired heating system have not been addressed. This could adversely impact marine species and seabirds.
- The applicants are seeking temporary planning permission for a period of five years. This period of time could not be considered as temporary.
- The precedent quoted by the applicants in Sandycove, Dublin is not comparable with the current proposal given the location of the Sandycove site removed some 400 metres from the seashore. In this instance, the high tide comes within approximately five metres of the sauna facility.
- The Coimisiún refused permission for the retention of two mobile sauna units at Rinville West, Oranmore, Galway under Coimisiún reference number 320607.

7.0 **Assessment**

Having examined the application details and all other documentation on file, the observation received in relation to the appeal and the report of the local authority, and having inspected the site, and having regard to the relevant local/regional/national policies and guidance, I consider that the substantive issues in this appeal to be considered are as follows:

- Principle of Development
- Visual Impact
- Coastal zone Impacts,
- Other Issues

- Appropriate Assessment

7.1. Principle of Development

- 7.1.1 The application as described within the public notices seeks permission for retention of a mobile sauna unit, a booking kiosk, a changing area and all associated and ancillary works. A temporary permission for a period of five years is being sought in this instance.
- 7.1.2 There is presently no land use plan relating to development within the settlement of Rosslare Strand. The Wexford County Development Plan 2022-2028 (WCDP) has been adopted and is the operative plan which has had regard to current national and regional policies. It is, therefore, a requirement to have regard to the policies and objectives as set out in the current WCDP. The WCDP does not include a zoning matrix whereby specific uses that are permitted, not permitted, or open for consideration are outlined. Notwithstanding the lack of such guidance within the Development Plan, the Development Plan does not preclude specific uses from within designated settlements, which the subject site is considered to be a part of.
- 7.1.3 I consider that proposals to retain a commercial sauna facility within a designated settlement as set out within Chapter 3 (Core and Settlement Strategy) within the current Wexford County Development Plan 2022-2028 could be considered acceptable, subject to a suitable and appropriate site being identified having considered issues in relation to the visual impact of the development, issues in relation to coastal zone management in terms of coastal erosion and flooding, access, parking and services all being adequately addressed. However, principle aside, it is only when these specific matters have been adequately addressed and assessed that one could ascertain if the current location within the sand dune complex immediately adjoining Rosslare Beach is the most appropriate location for the commercial sauna facility. These matters will be addressed in detail within the assessment below. Appropriate Assessment is another matter that will also be addressed, given the proximity of the subject site to a European site.

7.2. Visual impact

7.2.1 The design and layout as presented is modest in scale at 7.2 square metres for the mobile sauna unit and 6 square metres for the booking kiosk. The structures are both single storey and have stated heights of 3 metres and 2.2 metres respectively. The applicants submitted a Landscape and Visual Impact assessment (LVIA) report as part of their planning documentation. As per the landscape character assessment as set out within Volume 7 within the current Wexford County Development Plan 2022-2028, the subject site is located within a coastal landscape, and the sensitivity rating is classified as being 'high'. The LVIA concludes that the development is described as having a 'slight to negligible' impact within the local landscape. Within Volume 7 of the WCDDP the following is set out in terms of coastal landscapes: 'Coastal landscapes have a High Sensitivity to change and a limited ability to absorb new development. Development proposed within these areas must be shown not to impinge in any significant way upon their character, integrity or uniformity when viewed from the surroundings'. I consider that the development when viewed from the Beach area to the east of the appeal site and from the viewing points along the Cliff Road to the west of the site that the development, particularly the Royal Blue coloured booking kiosk container is visually prominent within this highly sensitive landscape and would adversely impact the visual character of this highly sensitive landscape.

7.2.2 There are a number of policy objectives in relation to landscape assessment as set out within Chapter 11-landscape and green infrastructure. These include policy objectives LO1, LO4 and LO6 which seek that developments have regard to their assigned landscape sensitivity, that developments are appropriately sited, designed and landscaped ensuring that any potential adverse visual impacts are minimised and that natural features and characteristics of the site are retained and that developments are not unduly visually obtrusive in the landscape'. The appeal site is visually prominent from the Beach area within Rosslare further north and south of the subject site. I consider that the sauna facility and the booking kiosk structure with its royal blue colouring, which is a converted shipping container, by virtue of the absence of landscaping and where some of the natural grasses within the sand dune areas have been lost/removed due to the placing of the Kiosk container on site and potentially due to the increase in footfall through the sand dune area to access the sauna facility. The development fails to integrate appropriately within the local seascape and would

visually adversely impact upon the local landscape, which is classified as being of 'high' sensitivity as per Volume 7 within the current WCDP and, therefore, would be contrary to specific objectives LO1, LO4 and LO6 within the current Development Plan.

7.2.3 I also note that the applicants have erected advertising signage at the top of the Beach access steps at the junction of the Coast and Cliff Roads and also towards the beachside end of the beach access steps at the start of the pathway to the commercial sauna facility. I note that the advertising sign at the top of the beach access steps is located outside of the red line appeal site boundary. I consider that this signage also adversely impacts upon the local seascape character and would be contrary to specific objective LO1 where the sensitivity rating in this area is classified as being 'high' within the current Development Plan.

7.2.4 On balance, and on the basis of the information submitted, I consider that the commercial sauna unit and booking kiosk structures taken in combination and particularly when viewed from the Beach area to the east of the appeal site and from the viewing points along the Cliff Road to the west of the site that the development, is visually prominent within this highly sensitive landscape and would adversely impact the visual character of this highly sensitive landscape and be contrary to the proper planning and sustainable development of the area.

7.3 Coastal Zone Impacts

Erosion

7.3.1 The subject site is located with an area of sand dunes and immediately adjoining the beach area within the settlement of Rosslare Strand. I note from the site location image submitted as part of the planning documentation, that much of the appeal site was grassed over, except for the area between the two military canon. Based on this imagery, it is evident that the booking kiosk structure has been placed on top of grasses within the dune area since the facility first operated, which is stated to be in May 2025. Once these grasses are disturbed/removed, it is unlikely that these sand dune areas would revegetate. The sand dune system is fragile and is important that the grasses are retained in place in terms of providing stability and structure within the sand dune system.

7.3.2 I also note the comments of the Coastal Engineer within Wexford County Council who stated that the development is in 'a coastal erosion risk area of soft coastline, located half way down a steep embankment, that the temporary sauna facility does not meet Coastal zone management objective CZM34 in relation to coastal erosion risk and coastal protection works and that Wexford County Council is working with the Office of Public works on the Rosslare Coast Erosion Flood Relief Scheme and have appointed Consultants to design and construct coastal protection works along this area. To introduce a temporary facility of any nature in this coastal erosion risk area could interfere with the revetment works and would not contribute towards the realisation of the CZM 34 objective'. Therefore, I consider that to permit the sauna development, or indeed any development in this coastal location area and below a steep clay embankment (stated to be of soft Coastline by the Coastal Engineer) would be premature pending the finalisation of the Rosslare Coastal Erosion Flood Relief Scheme which is presently being prepared jointly by Wexford County Council and the Office of Public Works. The current proposals would also be contrary to specific objective CZM30 within Chapter 12 of the current Wexford WCDP which identifies areas at risk of coastal erosion and include Rosslare. The retention of the sauna facility would also be contrary to specific objective CZM22 which requires that developments used by the public be universally accessible, and the current proposals are not universally accessible as acknowledged by the applicants (within their planning documentation), the observer and the Planning Authority. Therefore, to permit the retention of the sauna facility would be contrary to the proper planning and sustainable development of the area.

Flooding:

7.3.3 The proposed site is within an area with the potential for coastal flooding and hence the preparation of the Rosslare Coast Erosion Flood Relief Scheme. The applicant states the sauna facility and booking kiosk cabin are easily removed should there be a threat of a flood event. The applicants have not submitted a site-specific flood risk study to support the retention of the sauna facility. Therefore, there is uncertainty in terms of whether the sauna facility could be adversely impacted during a coastal storm event. I am of the opinion, based on the comments received from the Coastal Engineer within Wexford County Council that it would be premature to permit the

retention of the sauna facility in advance of the finalisation of the Rosslare Coastal Erosion Flood Relief scheme.

- 7.3.4 It is stated that the sauna facility is on wheels and thereby allowing the unit to be removed expeditiously in the event of adverse weather conditions. I acknowledge that the sauna use is not identified as being 'a vulnerable use' per se as per the Planning System and Flood Risk Management Guidelines 2009. However, it would be impractical, imprudent and ill advised to allow the placing of any structure with a three-phase electrical connection at a shoreline location that could be impacted at any given time by coastal flooding.
- 7.3.5 The application is not accompanied by a site-specific flood risk assessment (SSFRA) and as such the existing development would contravene Policy Objectives FRM07 and FRM08 of the Wexford County Development Plan 2022 – 2028 and the Section 28 Ministerial Guidance: Planning System and Flood Risk Management Guidelines 2009

7.4 **Other Issues**

Military Heritage

- 7.4.1 The appellant raised the issue of adverse impact upon the existing military heritage, in the form of the two canon features which are located each side of the sauna facility unit. I accept that these canon features are part of the local military heritage of Rosslare Strand, However, I am not aware that these military features are afforded a specific protection or designation within the current Wexford County Development Plan 2022-2028. Notwithstanding the location of the sauna facility unit in between the two military canon features, I am of the opinion that the development does not adversely impact the cultural heritage associated with the canon features and does not impede access to these features by the public.

Access, traffic and parking

- 7.4.2 The subject site is accessible from the beach area at Rosslare Strand and also from two metre wide set of beach access steps located at the junction of the Coast Road and Cliff Road within the southern part of the settlement of Rosslare strand. There is footpath connectivity within the village settlement along Coast Road which would allow for access for able bodied persons possible from many parts of the settlement.

In terms of universal access, there are a steep set of approximately fifty beach access steps connecting the site to the Coast Road which would make access to the sauna facility difficult for those with perambulators, wheelchairs or for those who are infirm. Access from the beach area would also be problematic for less mobile persons, due to the lower section of beach access steps and the variation in gradients that exist along the Rosslare beach area further north of the appeal site. I note that there are a number of policy objectives set out within the current Wexford County Plan 2022-2028 supporting universal access including objectives TM02 and CZM22. Therefore, I consider that the sauna facility would contravene these policy objectives and would be contrary to the proper planning and sustainable development of the area.

- 7.4.3 Given the relatively modest scale of the sauna facility and its location within a designated settlement, I do not consider that the sauna facility would generate significant traffic movements to/from the facility. There is also adequate public parking available along both and Coast and Cliff Roads and within the settlement of Rosslare Strand which patrons of the sauna facility could avail of. I do not consider that the sauna facility would adversely impact traffic safety or impede the safety and freeflow of traffic in this vicinity.

8.0 **AA Screening**

- 8.1 I have considered the development in light of the requirements of S177U of the Planning and Development Act 2000 as amended.
- 8.2 The proposed development is located within a built-up area and comprises the placement of a mobile sauna unit, booking kiosk container, changing area and associated site works. The closest European Sites, part of the Natura 2000 Network are the Wexford Seas SPA (site code 004237) which is located approximately 35 metres east of the subject site
- 8.3 The applicants submitted an Appropriate Assessment (AA) Screening Report and it concluded 'that the proposed development individually or in-combination with other plans or projects, will not have a significant effect on any European sites. Therefore, the project does not need to proceed to Stage 11 of the Appropriate Assessment process'. The Planning Authority conducted their own AA screening and concluded

'that the potential for adverse impacts on the SAC can be ruled out, and a Stage 11 Appropriate assessment is not required'.

8.4 Having considered the nature, scale and location of the existing development and the absence of any direct or indirect hydrological connectivity to any European site, I am satisfied that it can be eliminated from further assessment because it could not have any effect on a European Site.

8.5 The reasons for this conclusion is as follows:

- The modest scale of the development sought to be retained
- The location of the development in a serviced urban area, the absence of water services required to operate the development, the distance from European Sites and urban nature of intervening habitats, absence of ecological and or hydrological pathways to any European Site.

8.6 I conclude, on the basis of objective information, that the development would not have a likely significant effect on any European Site either alone or in combination with other plans or projects. Likely significant effects are excluded and, therefore, Appropriate Assessment (stage 2) under Section 177V of the Planning and Development Act 2000 is not required.

9.0 **Recommendation**

I recommend that permission for retention of the commercial sauna facility be refused for the following reasons:

10.0 **Reasons**

1- Having regard the location of the subject site within the sand dune area immediately adjoining Rosslare strand and below a steep cliff embankment, it is considered that to permit the retention of the commercial sauna facility unit and booking kiosk cabin structure in this fragile coastal location would be premature pending the completion of the Rosslare Coastal Erosion Flood Relief Scheme which is presently being prepared under the stewardship of Wexford County Council and the Office of Public Works. The current proposals would be contrary to specific objectives CZM30 and FRM07 and FRM08 within the current Wexford WCDP which

identifies areas at risk of coastal erosion and flooding and include Rosslare. The Coimisiún is not satisfied on the basis of the information submitted that the sauna development, either individually or in combination with other plans and projects, would not be likely to have a significant adverse effect on the Rosslare Strand coastline, would establish an undesirable precedent for similar future developments and would, therefore, be contrary to the proper planning and sustainable development of the area.

2-The existing sauna unit and booking kiosk structure taken in combination and particularly when viewed from the Beach area to the east of the appeal site and from the viewing points along the Cliff Road to the west of the site that the development, is visually prominent within this highly sensitive landscape and would adversely impact the visual character of this highly sensitive landscape. The development would be contrary to be contrary to Policy Objectives TM24, L04 and L06 of the Wexford County Development Plan 2022-2028, would establish an undesirable precedent for similar future commercial development and would, therefore, be contrary to the proper planning and sustainable development of the area.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Fergal Ó Bric
Planning Inspectorate

16th day of March 2026

Form 1 - EIA Pre-Screening

Appendix 1 - Form 1

EIA Pre-Screening

An Bord Pleanála Case Reference		PL-500303-WX					
Proposed Development Summary		Permission for retention of sauna facility and booking kiosk, changing area and associated site works.					
Development Address		Doogans Warren, Rosslare Strand, Co. Wexford					
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (that is involving construction works, demolition, or interventions in the natural surroundings)			<table border="1"> <tr> <td>Yes</td> <td align="center">x</td> </tr> <tr> <td>No</td> <td></td> </tr> </table>	Yes	x	No	
Yes	x						
No							
2. Is the proposed development of a CLASS specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended)?							
Yes	Tick/or leave blank						
No	Tick or leave blank	The retention of a sauna facility booking kiosk and changing area does not fall within a class of development as per Schedule 5 of the current Planning & Development Regulations.	x				
3. Does the proposed development equal or exceed any relevant THRESHOLD set out in the relevant Class?							
Yes	Tick/or leave blank						
No	Tick/or leave blank		x				

4. Is the proposed development below the relevant threshold for the Class of development [sub-threshold development]?			
Yes	Tick/or leave blank	Proposals relate to the retention of a sauna facility and booking kiosk, changing area and associated site works.	X

5. Has Schedule 7A information been submitted?		
No	Tick/or leave blank	X
Yes		

Inspector: _____

Date: _____