



An
Coimisiún
Pleanála

Inspector's Report

PL-500949-WX-26

Development	Holiday Eco Park consisting of 99 no. mobile home bays, communal amenity area, 214 no. car parking spaces, 32 no. bicycle parking spaces and all associated site works.
Location	Ballymoney, Courtown, County Wexford.
Planning Authority	Wexford County Council
Planning Authority Reg. Ref.	20251629W
Applicant(s)	David Cullen
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party Normal Planning Appeal
Appellant(s)	David Cullen
Observer(s)	Peter and Veronica Donohoe Mervyn Travers & Pauline Gallagher Janet Tarrant Philomena Moloney Eddie Bohan & Ailbhe Gilvarry

Elaine Ni Bhraonain & Dean
Gravenstein

Date of Site Inspection

17th July 2026

Inspector

Catherine Dillon

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1.0 Site Location and Description

- 1.1. The subject site is located c.180m as the crow flies to the south east of the centre of Ballymoney, a rural coastal village in County Wexford. Access to the site is via Ballymoney Road (L1000), south of the village with a vehicular access leading off this road onto Fairway Drive. Fairway Drive serves two low density housing developments, Hillview and Fairway, and the Seafield Hotel and Spa Resort. There is a strong hedgerow boundary to the rear of these properties onto the subject site.
- 1.2. The Seafield Hotel complex has 64 apartment/holiday accommodation which are to the south of the site and Fairway Drive. There is currently an access to the subject site from the Fairway housing development at the site's western boundary, which accesses onto to a signed Meadow Walk on the subject site.
- 1.3. The site has a stated site area of 6.68ha and is a greenfield site located within the former golf course connected to the Seafield Hotel complex. The golf course ceased operation in 2015, with the area no longer actively managed. The levels fall c.5m across the entire site, with the highest part of the site being in the centre at c.35m OD, sloping to the south to a level of 31.48m OD, 33.67m OD to the west and 29.8m OD towards the northern boundary.
- 1.4. The north of the site is bounded by the Ballymoney Lower stream which extends through two existing pond areas along this area of the site and enters the sea at Ballymoney Strand c.760m to the east. The site is a greenfield site with mature hedgerows and trees along its boundaries. There is a single storey maintenance building close to the proposed entrance. There is a further water course known as the Ballyscartin which extends to the rear of the Seafield Hotel complex and also flows into the sea.
- 1.5. The surrounding area is characterised by a dispersed settlement pattern with a mix of residential and tourist uses. To the north east of the site is a small housing development Beach Walk which extends into the Seafield complex with a vehicular access off Sea Road to the north of the subject site. There are 4 caravan and mobile home parks with associated amenities within a 1km radius of Ballymoney Village. Warren Caravan Park is c.150m to the north and, Prospect Holiday and Leisure Park c.300m to the west of the subject site.

- 1.6. Ballymoney village lies circa 5km to the east of Gorey town and 4km to the north of Courtown. The Ballymoney Road connects to Courtown and Gorey, while also linking to the R742 regional road and the M11 motorway.

2.0 Proposed Development

- 2.1. The proposed development would consist of the following:

- Construction of 99 no. mobile home bays with associated decking area and individual car parking spaces.
- Overall dimensions for each mobile home bay would be 14.5m x 14m. Each mobile home bay would have a private open space area in the form of a 4m wide wrap-around decking,
- A community amenity area of approximately 4.3 hectares is proposed to the north of the site to include a pond, a multi-use games area, 2 tennis courts, 2no. padel courts, 3 no. service huts, a children's playground area, an amenity looped walk with seating areas and picnic tables, a boardwalk and viewing platforms, TUK shop and equipment storage.
- A total of 214 no. car parking spaces, including 198 no. spaces provided for the mobile home bays and 16 no. visitors spaces including 3 no. EV charging spaces and 1 no. accessible EV parking space adjacent to the communal amenity area.
- A total of 32 no, bicycle parking spaces (including 1 no. cargo bike stand) located throughout the communal amenity area.
- A new vehicular access would be provided from Fairway Drive.
- It is proposed to upgrade an existing Treatment Plant to the south of the hotel to serve the proposed development and the Seafield Hotel & Spa Complex, and to modify an existing Treatment Plant to the north east of the subject site which currently serves the housing developments at Hillview, Fairway and Beach Walk.
- The development includes all associated site service connections and necessary upgrades to infrastructure, nature-based SuDs features, hard and

soft landscaping, planting, natural and formal play equipment, internal roads and footpaths, refuse storage area, public lighting, boundary treatments and all associated site development works.

- The SuDS measures proposed for the development include 2 No. attenuation ponds & 2 No. hydrobrakes.

2.2. The application was accompanied by the following documentation:

- Planning report
- Technical drawings
- Appropriate Assessment (AA) Screening Report
- EIA Screening Report
- Ecological Impact Assessment Report
- Infrastructure Report
- Tobin Consulting Engineer's Hydrogeological Assessment & Groundwater Abstraction report dated November 2025
- Lohan & Donnelly Consulting Engineer's Engineering Services Report dated 8/12//2025
- Transport Statement
- Site Specific Flood Risk Assessment
- Landscape Plan & Design Statement.

2.3. It is stated in the AA screening report the construction period would take approximately 12-15 months to complete. Construction traffic would access via the new vehicular access at Fairway Drive.

2.4. The planning report states that the applicant intends to reopen 9 holes of the original golf course lands and the golf clubhouse to the eastern side of the appeal site. However, this does not form part of this application based on any documentation submitted with the development.

3.0 Planning Authority Decision

3.1. Decision

- 3.1.1. The planning authority issued a notification to refuse planning permission for the proposed development on 11th February 2026, on the following 5 grounds:
1. The proposal constitutes a large scale, intensive tourism development which would be disproportionate to the scale and capacity of Ballymoney Village. The proposal does not constitute incremental growth appropriate to the size or character of the village and would be contrary to the principals of sustainable rural and village development set out in the Wexford County Development Plan 2022-2028.
 2. The application fails to demonstrate that the site has a suitable and legally secure means of access from the public road. The site edged red does not include the access from the public road and no evidence of right of way across the third-party lands has been provided. Furthermore, insufficient information has been submitted in relation to traffic impact, road layout, pedestrian and cyclist safety, construction management and unit delivery logistics. The proposal, if supported, would therefore be contrary to the proper planning and sustainable development of the area and to the traffic and transportation standards of the Wexford County Development Plan 2022-2028.
 3. The proposed development relies on a private water supply system, the capacity, quality and long term sustainability of which have not been satisfactorily demonstrated. Inadequate baseline sampling, absence of pre treatment groundwater quality data, lack of borehole mapping and inconsistencies in abstraction figures give rise to concerns regarding water quality, public health and cumulative impacts, contrary to the Wexford County Development Plan 2022-2028 objectives for water services and Environmental Protection.
 4. The applicant has failed to demonstrate that the existing and proposed wastewater treatment systems have sufficient capacity to accommodate the development without risk to groundwater or surface waters. Significant

deficiencies arise in the hydrogeological assessment, including incomplete mapping, unclear P.E. calculations, omission of servicing and maintenance details, and unresolved exceedances in surface water quality parameters. The proposed development is therefore considered premature pending the upgrade of the wastewater treatment system on site and in the absence of such upgrades, would be prejudicial to public health and contrary to the proper planning and sustainable development of the area.

5. Insufficient details have been submitted to demonstrate that surface water arising from the development can be satisfactorily managed within the site using sustainable drainage systems without adverse impacts on adjoining lands, watercourses or the public road. Given the soil conditions, runoff risk and proximity to sensitive stream environments, the proposed development would therefore be considered prejudicial to public health and contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Report

- Development would be a large scale and intensive tourism development disproportionate with the size and capacity of the Level 5 settlement hierarchy of Ballymoney village defined in the Core Strategy.
- Objectives TM51 & TM53 of the CDP only consider proposals for new caravan parks where they are ancillary to an 'Integrated Tourism/ Leisure/Recreation Complex' and can be adequately served.
- Lack of detail on the business model for the development and whether the amenity would be open to the general public, residents of the Seaford Hotel, and no. of employees.
- Landscaping as proposed would offer privacy to nearby residential properties.
- Applicant failed to demonstrate that there is adequate water supply and that the quality and quantity of the water supply is sufficient to serve the development.

- There are existing issues on site in relation to the waste water treatment system and a full and comprehensive report of the as built system has not been conducted.
- Total proposed PE of the WWTS is unclear & hotel and spa have been omitted in the calculations.
- Development could give rise to environmental pollution from surface run off to the stream during heavy periods of rainfall.
- Given the substantial reasons for refusal the roads sections further information request was not recommended.
- Notes the Ecological Impact Assessment conclusion, but unresolved drainage, wastewater and surface water management issues could give rise to indirect impacts on the Ballymoney Stream and associated habitats.
- Overall conclusion acknowledges a new mobile home development park within Ballymoney village may be considered acceptable, the size and scale of the proposal is unacceptable, application fails to address legal right of way, traffic, water supply capacity, wastewater treatment, surface water management and drainage.
- Hydrogeological Assessment has significant deficiencies and inconsistencies, regarding groundwater abstraction data and wastewater calculations giving rise to concerns regarding the protection of water quality, public health and receiving environment.
- Appropriate Assessment screening concluded no potential for significant effects to Natura 2000 sites & Stage 2 AA not required.
- No EIA required.

3.2.2. Other Technical Reports

Disability Access Officer report dated 15/1/2026:

- DAC required for any fixed and community amenity building.

Senior Executive Scientist (Environment) report dated 5/2/2026:

This report from the Council's Environment section is quite extensive and includes notes from both the environmental technician and agricultural scientist on the documents submitted with the application and site inspection observations.

Environmental Technician (Environment):

- Several issues were noted on site including odours, discoloured water and unexplained subversive pump.
- Inadequate information submitted with regards to the current condition of all the components of the treatment systems.
- Groundwater abstraction report estimates existing water abstraction 120-205m³/day based on data from 2019 & 2020; more recent water meter data needed (2024 & 2025).
- Elevated concentrations of ammonia, nitrogen, nitrates, and phosphates in some stream samples; missing data for northern stream.
- None of the water quality samples the groundwater aquifer prior to water treatment.
- Map required clarifying borehole locations & upstream & downstream locations.
- Building at entrance of the site appears to have a water connection and is not labelled on the maps.
- Full report on the current as-built system has not been conducted.
- Detailed report of TP2 omitted.
- Detailed report of size of reedbeds, ponds, treatment system not provided.
- No details on ultraviolet Disinfection Unit, no copies of servicing of maintenance of existing TP provided.
- 7 of the 14 samples failed and no information regarding corrective action.
- Total proposed PE and proposed PE of WWTP unclear and usage per day unclear.

- TP 1 is located in an agricultural yard and did not appear to be operating.
- Irrigation ponds appeared polluted.

Recommends refusal on the following grounds:

- Inadequate information regarding current TP, further investigations regarding water quality in streams, samples of boreholes, impact on ground water, PE calculations unclear and additional loading on TP, development poses a hazard to the public and Ballymoney Blue Flag Beach.

Agricultural Scientist (Environment):

- Recorded that 56% of annual rainfall is between Oct-March, but does not state that no irrigation is required during wet weather, it only suggests that storage would be 36 days.

Recommends refusal on following grounds:

- Proposed development may give rise to environmental pollution of both the North and South Stream valleys during heavy rainfall periods or when lands are waterlogged.
- It would be premature to grant such development on foot of an intention to open a 9 hole golf course which is highly dependent on the use of agricultural/horticultural land for wastewater sludge reuse.

Roads Design Engineer report dated 14/1/2026:

Recommends further information on the following:

- Clarification of the business model required including details of the style of units proposed, permanent for sale/lease/short or long term rental, will amenity area be opened to general public & residents of Seafield Hotel & Spa, and maximum number of employees.
- Site edged red should include the access from the public road.
- Details of right of way through third party lands.
- Road markings and signage within the development must be per Traffic Signs manual.

- Construction Management Plan required and include capacity of local road network.
- Traffic Impact Assessment required & Traffic Management Plan for proposed movement of units to and from the site.
- Visitor parking should be distributed throughout the development.
- Detailed drawings showing safe pedestrian access and cycling routes to/from site, footpath and road details.
- Surface water design and management plan.
- All surface water to be attenuated on site in accordance with SuDs.

3.3. Prescribed Bodies

Uisce Éireann: No response.

Office of Public Works: No response

3.4. Third Party Observations

A total of 13 submissions were received to the planning application. The submissions are similar to those raised in the observations to this appeal, which are set out in Section 7.3 of this report.

4.0 Relevant Planning History

Subject site

- 4.1. **P.A Ref: 98/0577 & ABP Ref: PL.26.108329:** Permission was refused by ABP to David Cullen on 12/4/1999, on the subject site for the erection of 69 dwellings, 3 commercial units and a clubhouse/ social centre, new entrance road and a sewage treatment system. The reason for refusal was on the following grounds:

Taking into account the scale of the proposed development, the absence of public water and sewerage facilities to service the development and the nature of the road network, it is considered that the proposed development, both in itself and the precedent it would set for further such developments, would be prejudicial to public health and would be unacceptable in terms of traffic safety and convenience. The

proposed development would, therefore, be contrary to the proper planning and development of the area.

- 4.2. **P.A Ref: 98/0576 & ABP Ref: 26.108328:** Permission granted to David Cullen on 12/4/1999, for 18 hole golf course, golf clubhouse, 3 detached houses, upgraded entrance and entrance road & sewage treatment system, subject to 18 conditions. Condition 4 the permission restricted the sewage treatment and disposal system to be designed and constructed to serve the needs of the golf course and the hotel. The housing element was refused.
- 4.3. **P.A Ref: 2016/1357:** Permission granted to Mary Cullen on 3/2/2017 for construction of 2 polytunnels and associated site works close to proposed entrance to subject site.

Relevant planning history in immediate vicinity of the site

Lands immediately to the eastern boundary of the site:

- 4.4. **P.A ref: 2020/1210 & ABP Ref:309203-21:** Permission was refused by ABP to Imelda Scully on 1/9/2021 for the construction of 8 houses on the grounds that a suitable wastewater system from the development site to connect to and rely on a commercial establishment, the operation of which was subject to enforcement proceedings, the Board was not satisfied that suitable wastewater treatment facilities were available to and under the control of the proposed dwellings at all times, and development was considered piecemeal and prejudicial to public health.
- 4.5. **P.A ref: 2019/1508 & ABP Ref:306591-20:** Permission was refused by ABP to Imelda Scully on 21/8/2020 for a similar type of development outlined in 4.4 above on these lands for 8 houses on the grounds that the Board were not satisfied the development had suitable wastewater facilities.

Lands immediately to the western boundary of subject site:

- 4.6. **P.A Ref: 2020/1555 & ABP Ref: 309672-21:** Permission was refused by ABP to David Cullen on 23/12/2021 for 85 no. dwellings and all associated works on 5 grounds namely; excessive level of development and suburban layout being out of character with the village, lack of suitable wastewater facilities, adequate quality of drinking water, and absence of a childcare facility.

Relevant planning history associated with the Seafield Hotel to the southeast of the site within applicant's ownership:

- 4.7. **P.A Ref: 2015/0493:** Permission was granted on 20/5/2015 for modifications to the existing hotel including projecting bar and bistro extension with new kitchen facilities and associated external terrace areas over an extended basement plant and service areas, at the Seafield Hotel, subject to 5 conditions.
- 4.8. **P.A Ref: 2008/0688:** Permission was granted on 2/5/2008 for the construction of a single storey pavilion with a link corridor to the existing golf clubhouse (427m²). The proposed pavilion was to connect to the existing approved effluent treatment plant and existing approved water supply. The pavilion was intended to be used as a multi-purpose function facility adjacent to the existing golf clubhouse. The permission was subject to 8 conditions.
- 4.9. **P.A Ref: 2005/4323:** Permission was granted on 23/3/2006, for alterations to previously approved hotel and spa building at Seafield Golf & Country Club, planning reg. reference number 2004/4802. Alterations included an increase in the number of bedrooms from 78 to 105, addition of banqueting hall, increased floor area to spa facilities, plant rooms and other consequential internal alterations, with revised roadway arrangements, additional car parking, associated landscaping and site development works and alteration of previously approved site boundary to accommodate all proposed revisions. The development was to connect to the existing approved effluent treatment plant and existing approved water supply. This permission was subject to 4 conditions.
- 4.10. **P.A Ref: 2004/4802:** Permission was granted to David Cullen for construction of 3 storey hotel with Spa with additional tourist accommodation approved under Ref: WCC 97/2031. The additional tourist accommodation units consisted of 64, two & three storey apartments, and 25, two storey, three bedroom houses. The development was to connect to the existing approved effluent treatment plant and existing approved water supply.
- 4.11. **P.A Ref: 2002/2808:** Permission was granted on 13/12/2002 to David Cullen for alterations to previously approved golf clubhouse design, ref. no. 98/0576. The development comprised a 706.6 sq.m. two storey clubhouse consisting of entrance hall, pro-shop and reception area, changing, shower and toilet facilities, with ancillary staff and storage areas, all on ground floor, with licensed clubhouse lounge and

spike bar, function room, with ancillary kitchen, toilets, bar stores, server and staff office, all on first floor along with alterations to previous approved carparking layout to consist of 149 associated carparking spaces to serve proposed clubhouse, with associated landscaping works. The development was to connect to the existing approved effluent treatment plant and existing approved water supply. This permission was subject to 4 conditions.

- 4.12. **P.A Ref: 97/2031:** Permission was granted to David Cullen on 6/10/1998, for construction of an hotel of three storeys consisting of 64 suites with a total of 100 bedrooms, a reception, bar/lounge, restaurant, public and staff facilities with service yard to rear and car parking all set in existing and new landscaped gardens with upgraded entrance and entrance road with new sewage treatment system. Detailed conditions were attached regarding water abstraction and testing. A new sewage treatment plant application was to follow under a separate application.

5.0 Policy Context

5.1 Development Plan- Wexford County Development Plan 2022-2028

- 5.1.1. The subject site is not zoned within the Wexford County Development Plan (WCDP). Ballymoney village is identified in the WCDP as a 'Level 5 Small Villages Category 2', within the settlement hierarchy of the County. The 'small village' level is divided into two categories, Level 1 and 2. The purpose of this sub-division is to ensure the development approach is appropriate to the character and scale of each type of village.
- 5.1.2. The role and function of Level 2- Small Villages is similar to Category 1 villages with the exception that they are generally smaller in scale, with more limited infrastructure and as such can accommodate lesser levels of growth than Category 1 villages. The development approach for future growth is incremental, sequential, small in scale and appropriate to the size, scale and character of the village, and consolidating new growth within the existing footprint of the village.
- 5.1.3. Relevant policies contained within the WCDP pertaining to the appeal include those relating to Core Strategy (chapter 3), Design & Place Making in Towns & Villages (chapter 5), Economic Development Strategy (chapter 6), Tourism Development (chapter 7), Infrastructure Strategy (chapter 9), Environmental Management (chapter

10), Landscape & Green Infrastructure (chapter 11), Coastal Zone Management & Marine Spatial Planning (chapter 12) and Heritage & Conservation (chapter 13).

5.1.4. Summary of objectives relevant to this appeal include:

TM03: To facilitate the development of a sustainable diversified tourism industry at appropriate locations and at a suitable scale, subject to compliance with the objectives of this chapter and normal planning and environmental criteria.

TM12: To balance the development of tourism facilities, infrastructure and accommodation in our towns, villages and rural areas with the needs of the communities, the need to provide for housing and year-round facilities and vitality for the resident population and the sustainable year-round use of existing infrastructure such as wastewater treatment infrastructure.

TM16: To facilitate the development of a variety of high-quality tourist accommodation within towns and villages, subject to compliance with Section 7.7.5 Tourist Accommodation and Chapter 4 Sustainable Housing, and normal planning and environmental criteria.

TM46: To consider the extension of an existing tourist related resort and amenity where it is outside of a settlement only where the proposal to extend the tourism/leisure/ recreation offering is commensurate to the overall scale of the resort and is appropriate at that location. The proposal to extend must comply, where relevant, with Section 7.7.4 and is subject to compliance with the Habitats Directive and normal planning and environmental criteria. The Council will only consider the provision of ancillary tourist accommodation where it remains subservient to the overall tourism/ leisure/recreation offering. In general the provision of new accommodation shall be required to be accompanied by commensurate improvement to the resort amenities and facilities. The provision of tourist accommodation on the site will be assessed on a case-by-case basis and in accordance with Section 7.7.4.

Section 7.7.4 relates to Integrated Resorts and Amenities and Section 7.7.5 of this chapter relates in general to tourism accommodation.

TM51: To require new holiday home developments, both individual and multi-unit, to take place in serviced towns and villages and to ensure that the scale and design of

development is appropriate to the settlement, enhances the character and any special qualities of the settlement. The Council will only consider the development of new holiday homes in a rural area where the development is ancillary to an 'Integrated Tourism/Leisure/Recreation Complex' and where the proposal complies with the provisions of Section 7.7.4, the Habitats Directive and normal planning and environmental criteria

TM53: To consider, on a case-by-case basis, proposals for new holiday chalet/caravan/ mobile home parks within existing settlements where there is not a proliferation of such developments and subject to them having a critical mass of onsite amenities and facilities (such as pools/playgrounds/indoor activity centres/restaurants) over and above what would have traditionally been the case for such developments. The Council will not consider proposals which would result in a reduction in the capacity in the public waste-water treatment system that would be detrimental to the delivery of necessary permanent housing. All such developments shall be required to have the highest standards of accommodation (minimum specifications shall be provided and will be conditioned as part of the development), layout, design and landscaping.

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.

Volume 2- Development Management Standards

- 5.1.5. Volume 2 of the CDP relates to Development Management Standards relevant sections relating to Holiday Home Parks (Section 5.7.2), Caravan, Camping & Glamping (Section 5.7.3), and car & bicycle provision (Section 6 & 7 and Tables 6-7 & 6-10).

Volume 7- Landscape character Assessment

- 5.1.6. The subject site lies within a coastal landscape which has a high sensitivity rating to change and a limited ability to absorb development within the County Development Plan. Landscape objectives L01-L15 are contained within this volume of the CDP.

- 5.1.7. The northern part of the site is shown to be subject to flooding but there is no development proposed on this part of the site. The remainder of the site is located within Flood Zone C.

Variation No.1 to CDP

- 5.1.8. A variation was made and adopted to the Wexford County Development Plan on 13th July 2026. The variation provided for updates to the Core Strategy and zoning and objective maps for Enniscorthy and New Ross Town and policy relating to Seveso sites. It would not have any bearing on the appeal proposal.

5.3 National Planning Framework (1st Revision) 2025

- 5.1.9. Relevant National Policy Objectives (NPO) supports the tourism industry subject to it enhancing the natural and cultural heritage, and of relevance to this appeal includes: NPO 30: Facilitate the development of the rural economy, in a manner consistent with the national climate objective, through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting biodiversity and the natural landscape and built heritage which are vital to rural tourism.

5.2. Regional Spatial & Economic Strategy for the Southern Region (RSES)

- 5.2.1. The RSES sets out tourism objectives for the southern region which includes regional policy objectives RPO 53, RPO 54 and RPO 173 which are referenced in the CDP.

5.3. Wexford Tourism Strategy 2019-2023

- 5.3.1. This overall aim and strategic goal of this strategy is included within the Tourism Development chapter of the Development Plan, with the overall objective being for County Wexford to become one of Ireland's most compelling tourism destinations and, in doing so improve the quality of life of people and communities throughout the county.

5.4. Other Guidance

- 5.4.1. **Waste Water Treatment Manual:** Treatment Systems for Small Communities, Business, Leisure Centres and Hotels- EPA published 1999
- 5.4.2. This guidance manual, includes recommended wastewater loading rates from commercial premises, including hotels, restaurants, function rooms and static not serviced and fully serviced caravan sites (Table 3.)

5.4 **Natural Heritage Designations**

- 5.4.3. The subject site is not located in or immediately adjacent to a designated European site. The nearest relevant Natural Heritage Designations are as follows:
- Ballymoney Strand pNHA, c. 760m to the east
 - Kilpatrick Sandhills SAC, c.6.3km to the north east
 - Slaney Valley River SAC, c. 8km to the west
 - Cahore Polders and Dunes SAC and Cahore Marshes Special Protection Area SPA, c. 13km to the south.
 - Seas off Wexford SPA c.15km to the south

6.0 **EIA Screening**

- 6.1.1. The planning application included an EIA screening report. The proposed development involves the construction of 99 no. mobile home bays, communal area, 214 car parking spaces, 32 bicycle parking spaces and all associated works.
- 6.1.2. The proposed development has been subject to a Screening Determination for an environmental impact assessment (refer to Forms 1 and Form 3 in Appendices 1 & 2 of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

6.2. **Pre Screening for Environmental Impact Assessment**

6.2.1. Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended (2001 Regulations), and section 172(1)(a) of the Planning and Development Act 2000, as amended (2000 Act), identify classes of development with specified thresholds for which an EIA is required.

6.2.2. I identify the following classes of development in the 2001 Regulations as being of relevance to the proposal:

Class 12 Tourism & Leisure

- 12(c) - Holiday villages which would consist of more than 100 holiday homes outside of a built-up area.
- 12(d) - Permanent camp sites and caravan sites where the number of pitches would be greater than 100.

6.2.3. The proposed development is sub-threshold in terms of mandatory EIA requirements arising from Class 12 (c) and (d) of the 2001 Regulations.

6.2.4. As such, the criteria in Schedule 7 of the 2001 Regulations are relevant to the question as to whether the proposed sub-threshold development would be likely to have significant effects on the environment and should be the subject of an EIA. The criteria include the characteristics of the project, the location of the site, and any other factors leading to an environmental impact.

6.3. Screening Determination for Environmental Impact Assessment

6.3.1. The applicant has submitted an Environmental Impact Assessment screening report (EIASR) with the application addressing issues which are included for in Schedule 7A of the 2001 Regulations.

6.3.2. Based on the criteria in Schedule 7 of the 2001 Regulations, I have carried out an EIA screening determination of the project (included in Appendix 1 of this report). I have had regard to the information provided in the applicant's EIASR and other related assessments and reports included in the case file. I concur with the nature and scale of the impacts identified by the Applicant and note the range of mitigation measures proposed. I am satisfied that the submitted EIASR identifies and describes adequately the effects of the proposed development on the environment.

6.3.3. I have concluded that the proposed development would not be likely to have significant effects (in terms of extent, magnitude, complexity, probability, duration,

frequency, or reversibility) on the environment and that the preparation and submission of an environmental impact assessment report is not therefore required.

6.3.4. This conclusion is based on regard being had to:

- (a) The nature and scale of the project, which is below the threshold in respect of Class 12 (c) and (d) of the Planning and Development Regulations 2001, as amended.
- (b) The location of the site in a rural area, and relevant policies and objectives in the Wexford County Development Plan 2022-2028, and the results of the strategic environmental assessment of this plan undertaken in accordance with the SEA Directive (2001/42/EC).
- (c) The absence of any significant environmental sensitivity in the vicinity of the site.
- (d) The planning history of the site.
- (e) The location of the development outside of any sensitive location specified in article 109(4)(a) of the Planning and Development Regulations 2001 (as amended).
- (f) The guidance set out in the “Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-Threshold Development”, issued by the Department of the Environment, Heritage, and Local Government (2003).
- (g) The criteria set out in Schedule 7 of the Planning and Development Regulations 2001, as amended.
- (h) The features and measures proposed by the applicant envisaged to avoid or prevent what might otherwise be significant effects on the environment, including those identified in the Appropriate Assessment Screening, Ecological Impact Assessment, and Environmental Impact Screening report provided in support of the application.

7.0 The Appeal

7.1. Grounds of Appeal

7.1.1. A first party appeal against the Planning Authority's decision has been lodged by Brock McClure on behalf of the applicant. A number of additional reports were submitted with the appeal in response to the reasons for refusal issued by the Planning Authority. These include the following:

- Letter from solicitor confirming ownership of applicant to access onto Fairview Drive,
- Updated site location map drawings,
- Response from Meinhardt regarding access, traffic and transportation matters dated 9/3/2026,
- Additional engineering drawings indicating junction signage and road markings,
- North and South Stream water sampling tests for 19/11/2025 & 23/2/2026,
- Water samples of irrigation ponds dated in 2023, 2024, 2025, & 2026.
- Report on 24-hour Step Drawdown Borehole Test Water & Microbiological Sampling, by Flood Water Solutions dated Feb 2026,
- A copy of a 2003 hydrogeological report associated with ABP Ref: 204782,
- Revised Hydrogeological Assessment by Tobin Consulting engineers dated 3/3/2026,
- Seafeld WWT service and maintenance records for 2023, 2024 & 2025,
- Soil Quality Report: Heavy Metals & Contaminates Soil sample laboratory report carried out on 15/10/2020 & 24/2/2026,
- Response from Lohan & Donnelly dated 27/2/2026 regarding the surface water management plan.

These updated reports will form part of my assessment of the appeal.

7.1.2. The grounds of appeal can be summarised as follows:

Refusal Reason No. 1- Principle of the development

- Consider this is a highly subjective reason for refusal.
- Acknowledge Ballymoney is a small settlement but the site is not a greenfield rural location unrelated to services but located within the established Seafield tourism cluster adjoining the Seafield Hotel & Spa Resort grounds, where tourism accommodation already forms a defining characteristic of the area.
- Development is a logical consolidation and completion of an existing tourism node rather than the creation of a new disproportionate tourism destination.
- When compared to the existing caravan and mobile home developments within the area, the proposed development is moderate in scale and represents incremental growth within an established tourism land use.
- Core Strategy primarily regulates permanent residential growth and housing allocations, and proposed development is seasonal and tourism based located within an existing tourism land use and does not compete with housing supply.
- Tourism accommodation is different to permanent housing in national and regional policy, and its assessment must consider tourism function and locational context, not solely settlement size.
- Currently 5 no 'large scale' caravan and mobile homes parks within 1.6km radius of the site, which demonstrates Ballymoney functions as a high-capacity holiday accommodation and that the scale of the development is comparative.
- Development in compliance with Objective TM51 and TM53 in that it would provide a variety of on-site amenities and facilities and would be functionally and physically linked to the Seafield Hotel & Spa Resort.

Pre- Planning Engagement

- Proposal is not a speculative ad hoc application.
- Refusal reason No.1 is contrary to advice in pre-planning meetings, and contrary to the rationale provided in S28 Development Management Guidelines regarding pre planning advice.

- Request the Commission to consider the formal pre-planning feedback received from the P.A when considering refusal reason No.1.

Business Model

- The commercial viability, financing structure, or operational business model of a development is not a material planning consideration.
- Mobile homes will be static, operate as holiday accommodation and will not constitute permanent residential dwellings.
- The amenity area within the development is intended to serve the occupiers of the mobile homes and will not be open to members of the public.
- It is possible that certain amenity facilities may be made available to hotel guests, however the precise operational arrangements would be determined at the management and operational stage, and would not alter the nature, scale or planning impacts of the development.
- The precise staffing structure will be determined during the operational phase of the development and will evolve over time in response to operational requirements.
- Seafield estate is a successful business model generating 243 local jobs (€36.2m annually) and the absence of a business model is not a valid planning basis in the planning assessment or in the determination of the planning application, is misplaced and inconsistent with the NPF.

Refusal Reason No.2- Means of access & insufficient information on traffic impact

- The site location maps submitted with the planning application identified the wider landholding in blue which includes Fairview Drive.
- Letter included with the appeal from solicitor (dated 6/3/2026) with an attached map and folio reference which states the application lands and the intervening lands outlined in blue are in the applicant's ownership. The lands are pending registration in Land Registry.
- Revised location map drawings were submitted with the appeal to demonstrate the relationship between the subject lands, the wider Seafield estate and public road.

- A response from Meinhardt Consulting engineers relating to this reason for refusal were submitted with the appeal.
- This report states the application was accompanied by a Traffic Statement (TS) which indicated the anticipated increase in traffic would be below the 10% threshold and did not warrant a Traffic Transport Assessment (TTA).
- The TS addressed traffic generation, network capacity, construction impacts and incorporated an Outline Mobility Management Plan and an Outline Construction Traffic Management Plan.
- The P.A's Road's Engineer report identified the need for a Construction Management Plan to address the construction impacts, and this can be prepared prior to commencement with the Roads Section.
- Swept path analysis drawings were submitted with the application which demonstrates adequate access and manoeuvrability for fire tenders, service vehicles, refuse trucks within the site and at the entrance.
- Road markings and signage drawings submitted with the appeal to indicate appropriate guidance and safety measures have been incorporated.
- Development is low density and destination based with traffic movements dispersed throughout the day rather than at peak commuter periods.
- Internal road has been designed to prioritise pedestrian permeability and incorporates traffic calming.
- Applicant is committed to undertaking a Road Safety Audit to independently review pedestrian and cyclist safety both within the development and at its access.
- Issues raised by the Roads Engineer's was for further information rather than refusal, and the issues raised are capable of resolution through clarification and detailed design, and conditions and do not provide a reasonable basis for refusal.

Refusal Reason No.3- Water Supply System

- Matters raised by P.A relate to matters of clarification and technical information which could have been addressed through further information rather than a basis of a refusal.
- Additional report submitted with appeal on '24-Hour Step Drawdown Borehole Test Water Chemistry & Microbiological Sampling' in addition to an historic Hydrological Report dated 2003.
- Borehole report demonstrates stable hydraulic performance and full recovery within 24 hours which supports a responsive groundwater system and in line with the 2003 testing.
- Chemistry and microbiological sampling indicate clear results and fears relating to water quality are unsupported.
- The aquifers haven't changed in terms of the amount they can produce since 2003 and will have no difficulties in providing 400m³ per day on site.
- Current water requirements for the hotel & spa, hotel suites, golf clubhouse and residential housing is 205m³.
- Hydrogeological evidence demonstrates that the existing private groundwater supply is reliable and sustainable and there is no basis for concerns regarding water quality, public health or cumulative impacts.
- The bore hole system has been operational for over 20 years, has been professionally designed and tested and continues to perform in accordance with the capacity established and accepted by the Commission in 2003.

Reason No. 4-WWTS capacity & risk to ground and surface water

- Submitted updated Hydrogeological Assessment (Tobin dated 3/3/26) with the appeal which provides additional information in respect of the WWTS, and concludes that the existing system has capacity in excess of the proposed development and is installed and working as designed and does not pose a significant risk to the public, surface water, groundwater or flora or fauna.

Risk to groundwater

- Water quality monitoring of the underlying aquifer indicates that the operation of the existing system has not adversely impacted raw water quality.
- Appendix A3 of the report includes sample results from 2 of the boreholes on site.
- Nitrate concentration and MRP on the groundwater and coastal waters will be imperceptible.

Surface water

- Sampling and analysis were undertaken at locations on both the north and south streams which demonstrate that nutrient levels including ammonia, nitrates and phosphates are lower downstream than upstream of the development, which indicates the development is not affecting surface water quality.
- Water quality is improved when it leaves the site compared to when it enters the 2 streams.

Servicing & Maintenance Details of WWTS

- Maintenance records submitted for the Seafeld Estate WWTS for the years 2023-2025, and these records are routinely submitted to the P.A for review and to date no issues have been raised.

Incomplete Mapping

- Confirms that the mapping submitted with the revised Hydrogeological Assessment addresses the mapping issue of P.A..

Unresolved exceedances

- Soil testing carried out in October 2020 and in February 2026 (Appendix D of revised Hydrogeological Assessment) confirms that there may be a deficit in nutrients rather than a surplus as loading is absorbed by grass growth and soil immobilisation.

- Soil samples were taken from an area of the golf course irrigated with treated wastewater and found that the soil was good with no evidence of adverse impacts from irrigation.
- Minor exceedances recorded are not considered environmentally significant and do not give rise to soil, groundwater or surface water quality.

Reason No.5- Surface Water drainage issues

- Application was accompanied by detailed engineering document which included a comprehensive Surface Water Management Plan, SuDs proposals and a detailed layout of the proposed surface water drainage network for the site.
- Surface Water Strategy for the development proposes a combination of nature based, green SuDs measures and for the design to mimic natural infiltration processes.
- The existing stream to the north of the site will be rerouted and separated from the larger attenuation pond to ensure there is no run off from the proposed site to the natural flow of the existing stream.
- It is proposed to line the existing stream and for it to be at a higher level than the attenuation pond to ensure the pond does not overflow into the stream.
- Both ponds are designed to have a level of water consistently with additional room to fill for the required volume of storage required for the 1 in 100 year storm.
- The greenfield run off rate has been calculated to consider the high run off rate from the soil at the site.
- Two hydrobrakes have been provided to ensure discharge from the site does not exceed the greenfield run off from the site prior to development and cause the existing stream and existing surface water run off to be over capacitated during the 1 in 100 storm event.
- It is considered the Groundwater Abstraction report was solely considered in relation to surface water management by the P.A..

7.2. Planning Authority Response

None

7.3. Observations

- 7.3.1. A total of 6 number of observations has been submitted from interested parties in respect of the subject appeal including photographs, and, in the interest of conciseness, and in order to avoid unnecessary repetition, I have summarised the key issues raised under the following headings:

Principle and scale of the development

- Non compliance with CDP objectives with regard to sustainable development, infrastructure capacity and protection of the character of the rural and coastal settlements.
- Premature as development relying on future upgrades to existing infrastructure.
- Development is overdevelopment, disproportionate and incompatible with the character and scale of Ballymoney village, with each mobile home generating foul water, surface water, grey water, vehicular traffic etc..
- Area already over supplied with mobile and holiday homes which bring no direct or tourist business into an area, and area already overwhelmed with visitors.
- Although there are other caravan parks in the area, this does not provide a precedent for more.
- Applicant argues that as the existing golf course was closed, that the lands are now vacant and underutilised, however, this illustrates that there is not a demand from tourists and visitors at this location to support a large tourism project and offers no evidence that it is sustainable and is speculative.
- Development does not meet the Failte Ireland Classification Matrix for caravan and camping parks.
- Would not enhance the area and would detract from ecological asset.
- Scale and design does not take cognisance of the coastal location and rural character.
- Inadequate amenities for users of the facility.

Infrastructure

- Caravan parks are outmoded, negatively impact on the environment including generating significant waste and foul water and the road infrastructure is not suitable to serve such a development.
- Insufficient details have been submitted in the appeal documentation to overcome the reasons of WCC regarding water supply, WWTS and surface water drainage.
- Site is not currently serviced to a level capable of supporting a major additional development of this scale.
- Development would place further strain on water supply, wastewater treatment, drainage, access arrangements and communal infrastructure, especially during the summer.
- Ongoing failures in water supply, water quality and water pressure in the area.
- A private water supply cannot serve 99 units on a permanent basis.
- The information submitted in the appeal regarding water supply are inadequate as the applicant continues to serve the proposed development and other development via boreholes.
- Appeal relies on a 2003 hydrogeological report relating to another development (PL26.204782), to draw the same conclusions on the suitability of the water supply.
- Concerns regarding why the existing treatment plant no.1 at the Seafeld estate hasn't already been upgraded.
- Given the ongoing enforcement proceedings regarding the WWTP, Wexford CoCo cannot be satisfied that suitable wastewater treatment facilities will be available for the proposed development at all times.
- The existing WWTP to serve the development cannot be relied on due to inadequate management in the long term and is unlikely to be taken in charge by UE., and if management company were to cease operation, this would impact existing residents.
- Increase in surface water runoff and any culverting of local watercourse could result in exacerbating localised flooding with the added risk of sewage contamination.

- Inadequate information regarding the existing sewer network and hydraulic capacity.
- Concerns raised by Board decision Ref: 309672 regarding water supply has not been addressed in this application.
- Major pollution incident in 2018 in relation to the existing WWTP and the Management Company were found guilty of non-compliance with Sections 3 & 4 of the Water Pollution Acts.

Traffic, access & parking

- Surrounding roads are not designed for high seasonal traffic volumes and the development could cause congestion, endanger public safety, and contrary to objectives of the CDP.
- Access to site via Fairview Drive located off Ballymoney Road is inadequate and sub standard.
- Development relies on a single access to the site which is immediately adjacent to a bend in the road, raises concerns about traffic safety.
- Lack of sufficient car parking provision for the development and employees.
- Inadequate parking in village, which could result in haphazard parking.
- Notes the Road's Engineer's comments indicate the list of deficiencies in the development, which have not been addressed.

Residential amenity

- Detrimental impact on the residential amenity by way of reasons of overlooking, loss of privacy, increased traffic, noise and disturbance during construction works and loss of views/visual intrusion.
- Noise pollution to permanent homes from humans, traffic, pets and 2 padel courts using the development.
- Residents paid substantial price for their homes based on the estate being a golf course which was closed abruptly.
- No amenities for residents or children.
- Loss of Seafield Meadow Walk created 5 years ago.
- Loss of walkways to the beach and increase in activity of other walkways.

- Contrary to Objective CZM21 which promotes development in coastal areas that provides social benefits for the local community.

Visual impact

- Development would detract from the rural character and coastal landscape of the area.
- Impact on adjoining graveyard is inappropriate and injurious to the cultural heritage of the area.

Environment & Biodiversity

- Impact on Blue beach flag status of Ballymoney beach & Ballymoney Strand pNHA which was temporarily closed in 2025.
- Development is a risk to bathing water quality.
- Overdevelopment of lands at Seafield has resulted in the destruction of protected habitats, species and biodiversity.
- Insufficient information in Ecological Impact Assessment, and contrary to objectives in CDP regarding natural heritage and biodiversity.

Inadequacies of the application & appeal

- WCC's decision relies to some degree on the past planning history of the site and adjoining lands which were refused planning permission namely; ABP Ref: 309672, 309203 & 204782, which have been refused due to technical issues, regarding water source, supply, and quality and adequacy of the existing waste water treatment plants, and general unsuitability of the lands for development.
- Applicant has not submitted any technical details to refute the expert opinion of the Planning Authority experts in the appeal.
- Proposal did not include a business model and the development is therefore an information vacuum.
- Cannot rely on lands outside the red line boundary to provide an access for the development.

- If the applicants are contending they have a wayleave over the lands this should have been indicated on the submitted drawings with the planning application and contends the application is invalid and requires readvertising.
- Development requires an EIAR as per Section 12 Tourism of Planning & Development Regs as it would consist of 99no. holiday homes outside a built up area.
- NIS required due to the potential of the WWT arrangements to cause impacts on Natura 2000 sites.
- Cannot conclude development either alone or in combination would not impact on Natura 2000 sites by reason of the hydrological regime or increased footfall.

Pre planning meetings

- Applicant refers to pre planning meetings but it is clear that WCC considered a much smaller proposal which could be serviced would be considered.
- All pre-planning meetings are held without prejudice.

Past failures to comply

- Seafeld estate has never been completed after 20 years and is in the ownership of a management company established by the applicant.
- History of non-compliance by the developer.
- Estate is already experiencing issues with water supply and wastewater management, and current infrastructure is inadequate to support the additional demand (photographs attached).
- Planning system cannot rely on intentions or assurances unless the adequacy of the infrastructure has been demonstrated.

8.0 Assessment

8.1. Introduction

- 8.1.1. Having examined the application details and all other documentation on file, including the reports of the Planning Authority, the submissions on file, 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:

- Policy context,
- Layout and Design,
- Residential amenity (new issue)
- Access and traffic
- Water Supply
- Waste Water Capacity
- Surface Water
- Loss of Biodiversity, and
- Other issues

8.2. Policy context

- 8.2.1. Refusal reason number 1 of the P.A considered the proposed development disproportionate to the size and capacity of Ballymoney Village, given the intensive scale of the proposed development. The applicant considers the development represents consolidation, incremental growth and completion of an existing tourism cluster, is not a standalone tourism destination, and the scale cannot therefore be assessed against the permanent population of the village.

Core Strategy

- 8.2.2. The subject lands are unzoned in the Wexford County Development Plan (WCDP) 2022-2028. The lands are currently laid to grass, with clusters of trees and scrubs evident within the centre of the site, which formed part of the former golf course use which ceased operation in 2015. There is an open access to the lands from Fairway Drive and from the Fairview estate onto the site to a marked Meadow Walk along the periphery of the subject site.
- 8.2.3. Whilst I acknowledge as highlighted by the applicant the Core Strategy of the WCDP is to regulate the permanent residential population growth and housing allocation, it also fundamentally sets out a settlement hierarchy and future roadmap for the spatial planning of the County in accordance with national and regional policy.

- 8.2.4. Ballymoney village is identified in the WCDP as a 'Level 5 Small Villages Category 2', within the settlement hierarchy of the County. The role and function of Level 5 Small Villages, Category 2, are places where the local rural community gathers and supports the identity of the local community. The development approach for such settlements in the CDP is to ensure they maintain their existing population levels and services, future growth is incremental, small in scale and appropriate to the size, scale and character of the village. New growth is to be concentrated within the footprint of the village in a sequential manner, closest to the village centre and 'leap frogging' of development will not be considered.
- 8.2.5. The existing resident population and settlement boundary for Ballymoney village is not specified within the CDP. From my site inspection, I consider the centre of the village is concentrated around the local shop at the Ballymoney/Sea Road junction. Extending beyond this junction, the village has a dispersed settlement pattern comprising linear housing along the radial roads, a number of clusters of small housing developments, a gated housing development to the north of the village (Sandycove) and a number of holiday homes and gated caravan parks.
- 8.2.6. The Seafield Hotel & Spa complex is set back off the Ballymoney Road and is accessed via Fairway Drive. Ballymoney Golf Club lies c.1.46km to the south west and Ballymoney Blue Flag beach is c.1.2km to the east, of the village centre. On the northern and southern periphery of the village accessible by a pedestrian footpath are 2 restaurant/public houses; the Tara Vale and Orphan Girl respectively. I consider the level of services within the village are limited reflecting the size of the resident population and overall scale of the settlement.
- 8.2.7. The Core Strategy identifies the tourism sector as having the potential to be a regional economic driver for the County. However, the potential for tourism development is identified for the larger settlements within the County such as Wexford, Enniscorthy, New Ross down to the smaller Level 3 Service Settlements of Courtown and Riverchapel for example. It is not however identified as the role and function of Level 5 settlements within the Core Strategy.
- 8.2.8. There are 2 relatively large caravan parks within Ballymoney village, Warren Park (94 units) and Prospect Holiday & Leisure Park (165 units). The proposed development would increase the number of caravan units by a further 38% within the

immediate vicinity of the settlement's centre which I consider is significant given the overall size of the village. I further consider this number of caravan units would impact on the character of the village during the holiday season and more importantly the vitality of the village outside the holiday season when the units would be vacant.

- 8.2.9. The applicant in their appeal submission have provided details of the number of caravans within a 1.6km radius of the subject site outlined in Table 1 below.

Table 1: Caravan/Mobile Homes within 1.6km radius of subject site

Facility	Distance from subject site	No. of caravan units
Warren Park	150m	94
Prospect Holiday & Leisure Park	650m	165
Tara Meadows Holiday Park	900m	168
Tara Cove Caravan Park	1km	165
Tara Glen Golf Club & Country Club	1.6km	246
Total		838

I consider a further 99 caravans would be disproportionate to the scale and to the relative permanent population of the village and would not be in accordance with the development approach identified in the Core Strategy for a Level 5 small village settlement.

Tourism policy of the CDP

- 8.2.10. The County Development Plan seeks to increase the profile of Wexford County as a holiday destination and in doing so increase the variety and quality of tourist accommodation and a diversification of the tourism product. There are a number of objectives within the CDP that support caravan parks, and extensions to existing tourist complexes, subject to such development being of a suitable scale, sustainable and enhancing the area. Objective TM12, seeks to balance the

development of tourism facilities with the needs of the communities, infrastructure and year round facilities for the resident community,

- 8.2.11. The applicant considers the development is in compliance with Objectives TM51 and TM53 of the CDP. TM51 requires new holiday home developments to take place in serviced towns and villages and to ensure the scale and design is appropriate to the settlement and enhances the character and special qualities of the settlement. There is therefore an emphasis placed on the development being within a serviced settlement. Nevertheless, within this objective the Council will only consider the development of new holiday homes in a rural area where the development is ancillary to an 'Integrated Tourism/Leisure/Recreation Complex;' and where it complies with the provision of Section 7.7.4 and normal planning and environmental criteria.
- 8.2.12. Section 7.7.4 of chapter 7 of the Plan states an integrated tourism/leisure/recreation complex may include a number of the following uses: hotel and associated facilities, health/spa/wellness facilities, restaurant/ café, conference centre, golf club, equestrian centre, nature trails, walking trails, trekking courses, indoor/outdoor water facility, fishing facility, museums/art galleries and associated facilities. The development must have a critical mass of activities to ensure that it is a self-sufficient destination tourism facility and not be developed in a piecemeal manner, respects the character of the area, must be based on an integrated and comprehensive master plan and business plan and the accommodation must be maintained in a single ownership.
- 8.2.13. I consider the existing Seafield Hotel complex would fall within the definition of an 'Integrated Tourism/Recreation Complex', as defined in Section 7.7.4. I note the golf course is no longer operational, but the hotel includes a conference facility, restaurant, 64 apartment units, leisure centre and a number of walks within the complex. Although the subject site is within the same ownership of the Seafield Hotel, section 7.7.4 requires an extension to such a facility to be ancillary and a masterplan and business plan to be accompanied by such a development, which has not been forthcoming in the appeal statement. The applicant considers a business plan is not a material planning consideration. Section 7.7.4 requires details of a masterplan and business plan for new holiday homes at an integrated tourism complex, the rationale being to prevent development being piecemeal, to indicate the

demand for such a development in the location and is not speculative, which is a reasonable approach. However, considering the size of the existing Seafield complex, the proposed development would be a significant expansion to the existing complex, and I consider the size of the proposal inappropriate in this regard.

8.2.14. The applicants in their appeal response have clarified all the mobile homes would be static and would not constitute permanent dwellings, the amenity areas would serve the occupiers and guests of the development only and would not be open to the general public. They state at this stage it is possible that certain amenity facilities may be available to hotel guests, however, the precise operational arrangements would be determined at the management and operational stage. They are of the opinion that any such arrangement would not alter the nature, scale or planning impacts of the proposed development. Furthermore, they submit that the Seafield Hotel generates 234 local jobs and contributes to the local economy, and that the absence of a business model detail is not a valid planning basis for concern. I note from the landscaping drawings that the proposed mobile home development would be enclosed by a gate, and it is not clear that this would comprise part of the overall hotel complex. I therefore do not consider this development meets the criteria specified in Objective TM51 and Section 7.7.4 to extend an 'Integrated Tourism/Recreation Complex'.

8.2.15. Objective TM53 permits proposals for new holiday mobile home parks within existing settlements where there is not a proliferation of such developments and subject to them having a critical mass of onsite amenities and facilities. The proposed development would provide a number of facilities and amenities including 2 tennis and padel courts, a playground, kickabout area, a looped walk, viewing platform and a boardwalk on site. The proposed amenities would meet the criteria of Objective TM53 in this regard, however, as outlined in the preceding paragraphs the development given its size and the number of mobile homes proposed, would result in a proliferation of mobile homes in Ballymoney, which Objective TM53 seeks to prevent. I further consider the location of the amenities proposed and given the gated nature of the development, it would serve the occupiers of the proposed mobile homes only, and as such would be remote from the village and the Seafield hotel complex and would not to any large extent enhance the character or amenities for Ballymoney village or form part of the Seafield hotel complex.

8.2.16. Objective TM46 permits the extension of an existing tourist related resort and amenity where it is outside of a settlement only where the proposal to extend the offering is commensurate to the overall scale of the resort, complies with Section 7.7.4, and normal planning criteria and remains subservient to the overall tourism offering. Section 5.7.1 of Volume 2 (Development Management) reiterates this objective and supports tourist attractions, subject to inter alia; such developments consist of a well-researched, justified and imaginative integrated project, do not contravene the landscape and coastal zone management objectives and relates sympathetically to the scale and level of activity in the locality. The first party are suggesting the proposed development would not be independent to the existing Seafield complex, however, given the size of the proposed development I do not consider it to be subservient to the overall complex as required in Objective TM46 of the CDP.

Tourism in Coastal Areas

8.2.17. The subject site lies within the Coastal Landscape character unit of the County, and such a landscape has a high sensitivity rating to accommodate change and a limited ability to absorb change. There are no scenic routes or protected views identified within the CDP which would be impacted by the proposed development. The CDP recognises that the coastal areas of the county experience greater pressure for tourism and residential development and are very sensitive to development and require protection in their own right and for the services and economic benefits they bring. Section 7.6.3 of the CDP promotes the development of coastal towns and villages so that a wide range of destinations and communities benefit and seeks to promote a number of leading lights with Courtown, Curracloe, Rosslare, Kilmore Quay and the Hook Peninsula receiving particular focus.

8.2.18. Third parties have raised concerns that the development is contrary to Objective CZM21 which supports proposals for new development or activities in coastal 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. As outlined above I consider the proposed development would not enhance or promote social benefits to the community given its scale and lack of connectivity for the residents of the village. It would further close an existing pedestrian access onto

the site currently used by residents in Fairway to the western boundary and remove the use of existing Meadow Walk which is open for the local residents to use.

Conclusion

- 8.2.19. Ballymoney village is a Level 5 Small Village Category 2 settlement within the overall settlement hierarchy of the County, and unlike other higher tier settlements its role and function has not been identified as a primary tourism settlement. The proposed development would result in a 38% increase in the number of mobile homes within 650m of the village centre. I consider this is excessive given the existing size of the village and would result in a proliferation of mobile homes within the settlement and would be contrary to the development approach for the settlement as outlined in the Core Strategy and Objective TM53 of the CDP.
- 8.2.20. I further consider the development fails to enhance or promote social benefits in this coastal location for the community, in accordance with Objective CZM21, in that it would be gated and the proposed recreational facilities would be for the users of the development only. There would therefore be a diminutive loss of this open space area for existing residents.
- 8.2.21. In the absence of a business model for the development, it is not clear how the development would integrate with the existing Seafield Hotel complex, nor does it provide evidence of an overriding need for the development in this location and how the development enhances the character or vitality of this coastal settlement in the interest of the community. The development would not therefore comply with Objectives TM12, TM46, TM51, TM53, CZM21 and Section 7.7.4 of the County Development Plan. If the Commission are minded to grant planning permission, I would recommend a condition is attached requiring the subject site and the Seafield complex be retained in single ownership and management.

8.3. Layout & Design

- 8.3.1. Where the principle and location of a holiday home scheme has been accepted Sections 5.7.2 and 5.7.3 in Volume 2 of the Development Management Manual of the CDP sets out a number of standards regarding the layout and design of Holiday Home/clamping parks. The standards relate to incorporating imaginative layouts, well laid out communal spaces, landscaping, sufficient private space, parking, impact

on residential amenity and must demonstrate that the wastewater treatment system is suitably designed to cater for the development without negatively impacting on water quality. I will address the infrastructure capacity of the development in Sections 8.7 below.

- 8.3.2. It is proposed to have a 4.3ha communal area located to the north of the subject site within the vicinity of the Ballymoney stream. A pond is proposed in this location with a boardwalk and viewing platforms. The sports facilities including 2 tennis and a padel courts and a multi games area would be located in this area in addition to a children's playground and 3 service huts. An amenity looped walk is also proposed for the development.
- 8.3.3. The layout of the development would centre around the primary and secondary roads serving the mobile home units with 2 principal roads, one extending from the entrance into the site through the centre of the site, and the other along the eastern boundary both leading to the recreational/sports hub area to the north of the site. The development would have a homogeneous layout reflective of the older caravan park layouts within the vicinity of the subject site and dominated to a large extent by the road layout.
- 8.3.4. The landscape plan indicates there would be extensive parkland tree planting (approx. 529 trees) along the eastern and southern boundaries and to the watercourse in the northern part of the site and attenuation pond in the south of the site and intermittently along the central road. However, there is little soft landscaping indicated between the mobile homes. An extensive grassed area is proposed along the western boundary and this is to be used as a 'secondary kickabout' area. The site boundaries would be enclosed with a 1.8m high weld mesh fence.
- 8.3.5. The overall dimensions for the mobile home bays are specified as being 14.5m x14m for each mobile home bay. Each bay would have a private open space area in the form of a 4m wide wrap-around decking, and each bay would accommodate 2 no. car parking spaces. A minimum separation distance of 7-8 m would be maintained between units.
- 8.3.6. The applicant refers to the Failte Ireland Classification Matrix for Caravan and Camping Parks and that the development is compliant with this document. It is a requirement in Volume 1 Section 5.7.3 that caravan parks comply with the

Registration Regulations for Short Term Tourism Accommodation Rental (Failte Ireland 2018)¹, although there are no specific standards regarding density for such parks within the CDP. The density of the development based on a 6.68 ha site would be 14.8 pitches per hectare which is stated by the applicant as not exceeding the maximum 50 pitches per hectare in the Failte Ireland document. I cannot find a reference in this document regarding density, however the density would be much higher when the recreational area (4.3 ha) is removed from the calculation and would equate to 41.5 pitches per hectare, which is at the upper end of the density range as specified by the applicant.

- 8.3.7. Although no cross sections or details of the extent of cut and fill have been provided of the proposed mobile park, it is indicated in the proposed layout that the FFL of the mobile homes would be c.31.4mOD in the north eastern corner, rising to on average c.34mOD in the central area and c.35mOD in the south western corner of the site. The proposed layout indicates the FFL of the mobile homes would be on a lower level than the existing levels on site. The landscape plan does not provide any cross sections/photomontages to provide an indication of the impact of the height of the development from the surrounding area.
- 8.3.8. Nevertheless, I consider the development which would incorporate a strong tree lined boundary along its eastern boundary would not impact on the coastal landscape to the east. On the day of my site inspection Warren caravan park was not visible from Ballymoney Beach and it is slightly closer to the coast than the subject site. However, given the expansive size of the site, I consider the mobile homes allowing for a height of c.3m above FFL would be visible from the immediate residential properties to the west and north.

Conclusion

- 8.3.9. I consider the proposed recreational area to the north of the site would provide a substantial and a high-quality amenity area for the future users of the mobile home park. Unfortunately, the overall layout of the mobile homes has been determined by the road layout and is reflective of older style holiday home layouts and would appear monotonous and does not incorporate an imaginative layout as specified in Section 5.7.2 of the Development Management standards for holiday home parks. I

¹ Holiday Parks are no longer required to register in the Tourism Bill published in April 2025.

also consider when the recreational area is removed from the overall area of the subject site, the density is relatively high for such a rural location.

- 8.3.10. I consider given the size and general setting of the site; a higher level of design and layout could be achieved. This is a new issue and the Commission may wish to seek the views of the parties. However, having regard to the other substantive reasons for refusal set out above and further below in this report, it may not be necessary to pursue this matter.
- 8.3.11. I would recommend in the event the Commission are minded to grant permission for the development that the recreational area is implemented prior to the occupation of any of the mobile home units to ensure a quality recreational element is provided for the development.

8.4. Access and traffic

- 8.4.1. Refusal reason No. 2 by the P.A related to the application failing to demonstrate that the site had a suitable and legal means of access onto the public road and across third party lands, and technical issues regarding insufficient information in relation to road impact, road layout, pedestrian and cyclist safety, construction management plan, and unit delivery logistics. I note the P.A's Roads Engineer sought further information on a number of these aspects.
- 8.4.2. Third parties have raised concerns that the access into the site off Ballymoney Road is substandard and inadequate, and that the single access into the site is on a bend on the road, the development would result in an increase in traffic volumes and congestion on the local network which are not designed for seasonal traffic, and a lack of sufficient car parking for the development and employees.
- 8.4.3. The applicant in their appeal response states the application clearly identified the wider landholding (lands indicated in blue) which includes Fairway Drive and as confirmed by way of a solicitor's letter, the applicant has a right of way over the subject lands onto Fairway Drive to serve the development. Based on the submitted solicitor's letter and the lands indicated in blue, I would be satisfied that the applicant has the legal ownership to provide an access off Ballymoney Road and from Fairview Drive into the site.

- 8.4.4. A response to the technical issues was submitted with the appeal which in summary concludes traffic generation and network impacts are within acceptable thresholds, the internal road layout provides for the safe movement of pedestrians and cyclists, a swept-path analyses was included within the original application, and internal roads are designed as low speed shared surfaces. Visibility, junction design, and internal geometry comply with national standards and any minor adjustments can be agreed with consultation with the Roads Authority. I note the planning application was submitted with a Transport Assessment and drawings indicating visibility splays and swept path analysis.

Existing and proposed access

- 8.4.5. The site would be accessed off the existing access off Ballymoney Road onto Fairview Drive. The speed limit along this stretch of Ballymoney Road is 60km/h. Although the subject site seems relatively remote from the village there is a footpath linking the existing entrance into Fairview Drive to the village along Ballymoney Road. The standard visibility splay for a junction with a 60km/h design speed as specified in DMURs is 59m. The drawings submitted with the planning application indicate this is achieved. This is an existing access, and I am satisfied that the visibility splays are achieved off Fairview Drive onto Ballymoney Road.
- 8.4.6. The proposed access into the site would be on a bend along Fairview Drive beyond the access into Hillview and Fairview housing developments. Fairview Drive also serves the Seafield hotel and Spa complex including the 64 aparthotels. The submitted plans indicate the proposed sightlines from the site onto Fairview Drive would be 23m at either side of the access set back 2.4m from the back edge of the road. According to DMURS, sightlines of 23m is acceptable for a design speed of 30km/h. I consider it reasonable to assume that traffic speeds are much lower along Fairview Drive Road compared to the Ballymoney Road. The Council's Roads Design engineer did not raise any concerns regarding the sightlines for the development. Although the proposed access is on a bend along Fairview Drive, I am satisfied the 23m sightlines are achievable, subject to the hedge being removed along the western boundary. This boundary is indicated as being in the applicant's ownership.

Trip and traffic generation

- 8.4.7. To determine whether a Traffic & Transport Assessment was required the potential impact of the proposed development on the local road network was assessed. This included a traffic count of the existing vehicles using the junction at Fairway Drive and Ballymoney Road carried out on 7th August 2025, between 07.00-19.00 hours. The counts indicated the AM peak hours occurred between 12.00-13.00 hours with 283 vehicles and the PM peak between 16.00-17.00 hours with 289 vehicles.
- 8.4.8. The TRICS data indicates that the proposed development would generate 21 no. two way trips in the morning (11.00-12.00) peak and 18 no. of trips during the afternoon peak (16.00-17.00) for the holiday accommodation. Based on the current peak traffic using the Ballymoney and Fairview Drive junction with the predicted peak traffic for the proposed development (worst case scenario), there would be an increase of 7.4% in the morning AM peak and 6.2% in the PM peak, which would not exceed 10% of the existing traffic flow. In accordance with the Department of Transport's Traffic & Transport guidelines, a Transport Traffic Assessment (TTA) and junction modelling is not required for the proposed development, as the increase in traffic flow for the proposed development would be below 10%.
- 8.4.9. I note although the Roads Engineer requested a TTA, however, the Roads engineer with their knowledge of the road capacity of the village did not raise any concerns regarding the traffic counts or TRICS data. Table 6-1 of Volume 2 of the CDP requires a mandatory TTA if the proposed development exceeds 10% of the traffic flow on the adjoining roads, or in the case of a road where the traffic congestion is high. Based on the traffic flow counts and TRICS data I would be satisfied that the traffic from the proposed development would not impact on the local road network to warrant a refusal on this ground. However, based on each mobile home having the ability to accommodate 2 car parking spaces the development has the potential to result in 198 cars coming and going to the site. Although the development would increase the number of vehicular movements along Fairview Drive, in addition to the traffic associated with the existing hotel complex, I consider based on the peak flow demands it would be spread over a period of time.

Car parking

- 8.4.10. Table 6-7 of the Development Management Standards Volume 2 of the CDP requires a maximum of 1 space per pitch for a caravan/camping/glamping site. Each mobile home would have 2 car parking spaces within each mobile home area resulting in a total of 198 car parking spaces. An additional 16 car parking spaces would be provided for the sports pitch, and tennis and padel courts, at a proposed drop off area between the multi use games pitch and children's play area to the north of the site.
- 8.4.11. It is noted the car parking standards within the CDP are maximum standards (Table 6-7 of Vol 2 of CDP). The car parking for the mobile home units is based on residential standards (2 spaces per house). The rationale for providing the maximum number of car parking spaces for the mobile home units is that the occupants are likely to travel from various parts of the country using private cars. I consider this an excessive number of car parking spaces for the proposed mobile home units.
- 8.4.12. A total of 16 visitor parking spaces is proposed to the north of the park next to the recreational area. The car parking for the sports pitch/lawn, tennis and padel courts would require a maximum standard of 20 car parking spaces in accordance with the CDP parking standards for such a use. The rationale for 16 spaces for these facilities in the Transport Assessment is that 'these facilities will be mostly used by the Holiday Park residents that will generally walk or cycle from the residential units within the development. Additionally, these facilities are destined to the Holiday Park residents, and providing additional car parking spaces will attract more external users'. I consider this a reasonable approach if the recreational facilities are for users of the caravan park only. I note a drop off area is also proposed next to these car parking spaces which would suggest that members of the public could avail of the facilities. Given that each mobile home would have 2 no. car parking spaces I do not consider it necessary to have visitor parking on the site. No details have been provided for employee numbers and as such it is not clear whether these spaces are for employees.
- 8.4.13. Each mobile home bay would provide 1 no. standard electric plug for EV charging. The visitor parking will include 4 no. EV charging spaces (25% of car parking spaces provided) and the remaining car parking spaces would be provided with the

necessary infrastructure to accommodate charging points in the future if required. This would comply with the CDP standards in this regard.

Cycle parking

- 8.4.14. A total of 32 no. bicycle spaces in the form of Sheffield Stands and 1 larger cargo bike stand are proposed for the development. No designated bicycle parking is proposed for the mobile home units, as it is considered that users of the mobile homes would arrive with their own bicycles mounted on their vehicles, and that there would be appropriate space within the homes for bicycle storage.
- 8.4.15. Table 6-10 of Volume 2 of the CDP requires 1 private secure bicycle space per bed space & 1 visitor space per two housing units. Although the applicant has chosen to use the car parking standards associated with a house for each mobile home, they have not provided specific spaces for designated bicycle parking for the mobile home as per the standards. Bike spaces for 'other developments' in the same table, requires 1 bike space per car space, or 20% of employee numbers in general. Employee numbers have not been provided by the applicant for the development.
- 8.4.16. I would tend to agree with the applicant that future users/occupiers of the mobile homes would accommodate parking for bicycles brought with them on the individual site. There would be space within each space to accommodate bicycle parking and this could be dealt with by condition.

Construction Traffic Management Plan

- 8.4.17. It is stated within this report that a Stage 1 Road Safety Audit (RSA) would be submitted with the planning application. I can find no record of a Road Safety Audit being submitted with the proposal. However, the CDP requires a RSA on National Roads and where a TTA has been requested. I note as part of the Roads Engineer further information request a Traffic Impact Assessment was sought, although a Roads Safety Audit was not requested. Based on the CDP policy, a RSA is not mandatory for this development as it does not access onto a national road.
- 8.4.18. I am satisfied based on the plans of the internal road layout and swept path details, (Dwg No. XX-ZZ-DR-Y 001) that there is adequate provision for a refuse vehicle to turn within the site.

8.4.19. The Framework Construction Traffic Management Plan (CTMP) provides a set of measures to be included in the final CTMP for the proposed development. It covers aspects such as working hours, transport coordination, delivery of materials, route compliance, vehicle compound, dust and dirt control, noise control, waste management, working hour times and other mitigation measures. The plan aims to minimise disruption to the local community, ensure proper storage and disposal of waste, and address potential environmental concerns during the construction process.

Conclusion

8.4.20. I consider in line with the Area Engineer's request for further information details are required regarding the business model for the proposed development, in order to determine levels of employees, how it is intended to operate the recreational area, delivery times, operational times for the users of the facility etc.. I note the applicant in their submission do not consider this a planning consideration but I consider it is necessary as highlighted by the Road's Engineer, that details regarding whether the mobile home units would be permanent for sale/lease/short or long term rental is a consideration in terms of whether there would be a high level of occupancy of the units and whether the amenity area would be open for members of the public, the number of employees for the development etc., are all issues which would provide a comprehensive assessment of the level of parking required for the overall development. These aspects were not addressed in the appeal response.

8.4.21. However, based on the road traffic and TRICs data, I am satisfied the development could be accommodated at the site without impacting on traffic congestion or safety on the surrounding roads.

8.5. Residential Amenity

8.5.1. Third parties have raised concerns about the effect of the proposed development on residential amenity due to a loss of privacy, overlooking, increased traffic and noise and disturbance from construction traffic and from users of the development. Other issues raised includes the loss of the golf course for residents of the Seafield estate, and the loss of Meadow Walk which was created 5 years ago.

- 8.5.2. Property Nos. 6-9 Hillview are set back c.24m from the south western boundary of the site. Nos. 6-9 Fairway are set back c.14m from the western boundary. The Beach Walk development is separated from the site between c.128m by green field lands to the eastern boundary of the site. The northern boundary of the site is set back c.53m from the houses along Sea Road. I consider given the separation distance of the mobile homes to the boundaries with neighbouring properties and proposed landscaping the development would not result in overlooking or a loss of privacy to the existing occupiers.
- 8.5.3. There is an existing undefined path from Fairway housing development onto the subject lands at the western boundary. It is not clear whether this access formed part of the original permission for this estate, however it is proposed to erect fencing along the western boundary of the site which would close this access. The P.A planner's report states there is no record of enforcement at the site, and non-compliance with previous planning permissions falls within the remit of the P.A and enforcement issues are not a matter for the Commission.
- 8.5.4. I noted on the day of my inspection there was a sign on the subject lands for a Meadow walk across/through the subject site and given the existing open nature of the subject site, members of the public can currently use this pathway. Third parties have not stated the origin of this walkway and as such it is not a designated open space area, however, based on the applicant's submission that the development would be gated, this walkway would not be available for residents in the area following the development. However, the subject lands are in private ownership and the applicant can therefore restrict access onto the lands at anytime.
- 8.5.5. The use of the lands for a mobile home park would result in an increase in noise and activity on the subject site, from music, vocal noise, children playing on the kick about areas, users of the recreational areas, tennis and padel courts. Although most of the activity associated with the park would be predominantly during the daytime, given the transitory nature of such a use this would extend into the evening during the summer months when the evenings are brighter, and therefore by the very nature of the use there would be a level of activity during the evening/nighttime. The tennis and padel courts would be located to the north east of the site, c.78m from the rear of the houses along Sea Road. Although padel courts tend to be noisier than tennis courts, I consider, subject to a condition restricting noise levels to 45dB(A)

during the nighttime, there would be no impact in terms of noise from the padel courts.

- 8.5.6. The lighting plan submitted with the proposal indicates bollard lighting around the recreational area including the tennis and padel courts and standard lamp posts along the roads and car parking area. The lighting is stated as being of a low intensity. Nevertheless, I consider there could be an element of light spill from the lamp posts currently not experienced by the neighbouring residential houses backing onto the site, but this could be conditioned by way of appropriate fittings to the lighting.
- 8.5.7. Regarding noise from construction traffic and during the construction period of the development, I consider this would be short term in nature (12-15 months) and would not therefore have any concerns that the construction traffic and works would have an unacceptable impact on residential amenity. The working hours for construction are stated as being 07.00-19.00 Mon-Fri and 08.00-14.00 hours on Saturday, which I consider to be standard and not unreasonable given the duration of the works, and traffic movements would be scheduled to minimise peak hour disruption.

Conclusion

- 8.5.8. I consider given the number of mobile homes associated with the development and the potential for each mobile home to have at least a minimum of 4 occupants², that there would be a level of noise associated with the development, particularly impacting the residential amenities of the occupiers to the west (location of kick about area), which currently doesn't exist at present.
- 8.5.9. The houses in Hillview and Fairway which bound the western boundary of the site appear to be occupied as permanent dwellings. Overall, I consider the proposed development would impact on the residential amenity of the occupiers of the adjoining properties by reason of noise, lighting and general nuisance due to the transitory nature of the use and the overall number of mobile homes on what is currently a greenfield area.

² Table 1 of Groundwater Abstraction report specifies 4 persons per mobile home, max occupancy =396

8.6. Water Supply

- 8.6.1. Refusal reason No.3 of the P.A relates to the capacity, quality and long term sustainability of the private water supply for the development, and a lack of adequate testing of the groundwater data and inconsistencies in abstraction figures based on the information supplied as part of the planning application. Third parties have stated there have been ongoing failures in the water supply and its quality (photographs attached in this regard) and the proposed development would place further strain on the water supply.
- 8.6.2. The applicant in their response to this aspect consider the issues raised could have been addressed through further information and have submitted substantial additional information with the appeal which includes a 2003 hydrological report associated with a previous appeal on the site, an updated hydrogeological report dated Feb 2026 containing results of a 24 hour drawdown borehole test which demonstrates the existing groundwater supply is similar to the 2003 report and is therefore stable.
- 8.6.3. The subject site is underlain by a regionally important aquifer which has a WFD status of good, with ground water flow from the west to the east. The existing water supply serving the existing Seafeld complex is a private supply and currently serves the hotel and spa complex including the apartments and the neighbouring housing estates Hillview Crescent, Fairways and Beach Walk, and is sourced by 5 production boreholes within the overall blue lands. With the exception of Borehole 3, which is located close to the south western boundary of the site, all of the other boreholes are located outside the subject site.
- 8.6.4. In the 2003 hydrological report, submitted with this appeal, it is concluded that the aquifer at the site would yield and sustain in excess of the maximum projected demand of 400m³/day, and the drawdown created by pumping the wells does create a drawdown in water levels, but not significant. I note there has been several permissions granted for the hotel since the date of this 2003 report.
- 8.6.5. In addition to the 2003 report, a 'Report on 24-Hour Step Drawdown Borehole Test' (Feb 2026), was submitted as part of the appeal. This test assessed borehole 3, next to Hillview & Fairway, and compared the 2003 results with those carried out in the more recent report. The results from the drawdown test indicated that the borehole

matched the 2003 results for this borehole, which were 288m³/day, water quality was clear and water levels recovered quickly. I note in this report, that the normal 24 hour step test and 72-96 hour yield test was not achievable due to the continued operation of the hotel, apartment suites and housing on site, its high level of occupancy and the short time frame allowed to carry out the test.

- 8.6.6. In the original Tobin ground water abstraction report submitted with the planning application (dated 2025), the total peak water abstraction with the additional 99no. mobile homes is stated at being <300m³/day, based on existing planning permissions and system design. In Table 1 of this document the hotel & spa complex, is stated as using between 120-205m³/day, with the 120m³ volume relating to low flow in 2019 and 2020. It is estimated allowing for the proposed mobile homes with an occupancy of 4 persons using 150 litres per day (equivalent to 60m³/day), combined with the existing development, the proposed volume of water required would be 265m³/day and therefore <300m³/day.
- 8.6.7. Two boreholes (unspecified location) were tested in this initial report over 2-5 days which indicated there was a constant rate of between 130m³-175m³ per day. Borehole 1 was tested for 2 days and had a rate of 130m³/day, and borehole 2 for a rate of 5 days with a constant rate of 175m³/day. This test referred to 2 boreholes and did not include the other 3 production boreholes on the site.
- 8.6.8. The Tobin Report and 24 hour drawdown test do not specify the exact number of persons associated with the hotel, spa, restaurant and aparthotels and therefore it is not clear how the figure of 205m³ litres per day has been calculated. This would however equate to c.1,350 persons. I consider greater clarity regarding the overall consumption of the existing hotel complex should be provided, particularly during the peak holiday demand. Whilst the underlying aquifer may be capable of producing 400m³/day, I cannot conclude in the absence of more detail regarding the current peak demand of the existing complex over an average number of months/years that the private water supply is adequate to serve the proposed development. I therefore agree with the P.A in this regard that a better indicator of water usage would be meter reading results.

Conclusion

- 8.6.9. The site is underlain by a Regionally Important Aquifer, has a WFD status as 'good', and given the nature of the aquifer would generally have a high productivity and storage capacity. I note the contents of the 2003 well report, the borehole rates submitted with the 2025 report, and the recent 2026 borehole test, the latter which acknowledged a number of limitations. I consider based on the additional information the applicant has provided evidence that borehole 3 was capable of yielding 288m³/day over a 24 hour period in February.
- 8.6.10. I note in the 2003 hydrological report, the maintenance of the wells will be dependent on their management. The Tobin Abstraction report recommends water levels should be monitored for the next 2 years on a quarterly basis and water quality monitored in accordance with the Drinking Water Regulations. The report from the P.A's Environmental technician considers water meter information including peaks and averages for more recent years, namely 2024 and 2025 would be more representative of the current water consumption. I further consider, the well yields provided in the submitted application and appeal, should include results carried out over the peak summer demand and based over a number of years.
- 8.6.11. However, I am also cognisant of the submissions made by third parties that they have had problems with the water quality and supply to their homes in the past. Based on the additional information submitted with the appeal, I am not satisfied that adequate information has been provided to enable me to conclude the additional water demand from the proposed development would not impact on the existing water supply to the existing residential occupiers, during the peak tourist season and would agree with the P.A that there is inadequate details in this regard.

8.7. Waste water capacity

- 8.7.1. There is an overlap between the P.A's refusal reasons Nos.4 and 5. Refusal reason No. 4 related to the existing and proposed wastewater treatment systems (WWTS), not having sufficient capacity to accommodate the development without risk to groundwater or surface water, I am going to firstly address the WWTP part of the proposal.

- 8.7.2. There are currently 2 WWTPs on the lands in the applicant's ownership (blue line) which serve the existing hotel complex and also include the neighbouring houses within the blue line area. Effluent is pumped from both WWTPs into a large wetland area where it is treated before entering into an upper holding pond and filtered into a lower irrigation pond, which is ultimately used to irrigate the landscaped areas (former golf course). The applicant has stated that they do not hold a discharge licence for the treated effluent as it does not enter the surface or groundwater.
- 8.7.3. The existing wastewater loading is stated as being currently 205m³/day for the development as a whole, and the system is designed to cater for 480m³/day. The total storage available in the upper holding pond, lower irrigation pond and 2 polishing ponds is 7,500m³/36days equivalent. It is stated the treatment system is currently operating at 43% of the design capacity, and there is a water deficit for irrigation purposes. I noted on the day of my site visit the lands are currently not being used as a golf course.
- 8.7.4. The applicants in their appeal response have submitted an updated hydrogeological assessment by Tobin Consulting engineers (dated 3/3/26) for technical information on the WWTS, which concludes that long term monitoring confirms no adverse impacts on soil, groundwater or surface water.

WWTP No.1

- 8.7.5. WWTP 1 is located to the south east of the existing hotel complex in a farmyard/maintenance area. Currently this TP receives wastewater from the hotel & spa, golf clubhouse/ function room, restaurant and 64 apartments. The applicants have not provided details of the existing P.E capacity of this TP. In the absence of this information, it is not possible to assess whether this treatment plant is meeting the capacity to serve the current hotel complex development.
- 8.7.6. However, it is proposed to upgrade this TP at this location to provide a more efficient treatment system for the existing commercial element and accommodate the mobile home development. Calculations provided in the updated hydrological report (Appendix B) provides BOD and Flow loads for the proposed mobile home development combined with the hotel complex. These calculations do not include the leisure and spa facility and do not differentiate between peak/off peak. It is stated the TP would have a total BOD load of 1,115 P.E and Flow load of 817 P.E.. Based on

the BOD figure as provided, the upgraded TP 1 would need to have a capacity of at least 1,115 P.E.. The applicants are proposing a 'Plug & Play' sewage system designed for 20-5,000 P.E., and it would have a 30 year lifespan and include a maintenance contract. It would appear, but not confirmed, it is the intention to use the irrigation pond on the former golf course lands to dispose of the effluent. Nevertheless, I consider it is necessary to have clarity with regards to the existing and proposed WWTP's P.E capacity, and this aspect in my opinion has not been addressed satisfactorily by the applicants to ensure the treatment of effluent can be treated adequately within the wetland system. As highlighted in the P.A's Environment Technician's report no ground water samples were taken prior to water treatment, the building at the entrance of the site was not included, and unclear P.E calculations for TP1, and the location of boreholes near the agricultural dung heap has not been provided, in the response to this appeal.

- 8.7.7. I consider in line with Section 5.7.3 of the Development Management standards of the CDP for caravan development, where connection to the public wastewater network is not possible it must be demonstrated that the proposed wastewater treatment system is suitably designed to adequately deal with periods of inactivity, such as outside the summer period. I do not consider this has been demonstrated for TP 1.

WWTP No. 2

- 8.7.8. This plant is located to the east of the subject site and north of TP 1 and consists of 2 no. 500 P.E packaged plants and was designed to cater for 250 houses. It is clearly stated in the revised hydrological report that the capacity of this plant is 1000 P.E and the existing load is 375 P.E.. These figures are based on the existing plant serving 75 dwellings, and it is not clear how the stated housing figures have been calculated as the existing houses in Hillview, Fairways and Beachwalk do not equate to 75 dwellings. Nevertheless, the existing TP is running at a reduced capacity and as part of this appeal it is intended to convert the aeration tanks and clarifiers of one of the TPs at this location to a pump chamber to balance out the flow on peak occasions and reduce the TP capacity to 500 P.E.. This would seem reasonable given the existing plant exceeds the P.E. currently required.

Treated effluent

- 8.7.9. The quality of the effluent from the packaged treatment system, the constructed wetland, the upper irrigation pond and final treated effluent contained in the lower irrigation pond was set under planning permission WCC 2005/4323. This is indicated in Table 4-1 of the original hydrogeological report, with BOD levels set at 5mg/l, phosphorous levels at 0.5mg/l, ammonia levels at 2mg/l and total coliforms levels at 500/100ml.
- 8.7.10. The updated hydrogeological report includes water sampling tests carried out at the final pond in the months of April-December 2023, in March, April July & Sept in 2024, and June-August and in December 2025 (total of 22 days). Although these were generally on one day of each of these months, I consider they provide an average assessment of the water quality in the final pond over a 3 year period. It is noted the total phosphate levels had an average of 0.61mg/l resulting in 7 exceedances. However, soil tests carried out in Oct 2020 and Feb 2026, indicate there was no build-up of phosphorus in the soils, and levels were below guidelines levels.
- 8.7.11. The sampling tests for the same period for Total coliforms/faecal coliform indicates that the levels are below that in Table 4-1 as specified in the original planning permission, which would indicate the treatment system is operating effectively in this regard. The irrigation ponds would appear to indicate from the samples taken over a 3 year period to be meeting the levels as specified in the original permission.

Water quality

- 8.7.12. Water sampling testing was carried out on 4/11/2025, 13/2/2026 and 24/2/2026, at the streams to the north and south of the subject site, in the updated hydrogeological report with the sampling locations indicated. The sampling parameters included PH levels, dissolved oxygen, BOD, ammonia, nitrate, total phosphorous and COD and suspended solids. The results indicate that the water quality was better downstream at both streams, and all of the results indicated at least good ecological status with the downstream values being closer to high status thresholds, in accordance with the Surface Water Regulations. It would therefore appear based on the 3 sample tests that the water quality of the 2 streams are not impacted by the existing wastewater system at the site from run off on the lands.

Conclusion

- 8.7.13. Given the wastewater drainage relationship between the Seafield complex and the proposed development, it would seem they are to be managed as a single entity. The P.A's Environment Technician in their comments to the development sought a full comprehensive report on the current, as-built system to be conducted, and that the application did not provide a detailed account of the current purpose, conditions and size of all elements including the reedbeds, ponds, treatment system, each individual tank and all associated infrastructure. This matter has not been addressed in the appeal submission. Based on previous issues with the WWTS on the site, I consider the existing capacity of the TP1 should be provided before further development on the site.
- 8.7.14. I note in the revised hydrogeological report, that the calculated P.E. for the whole development is now stated as 1192 P.E., which suggests that this has been based on the Flow P.E rather than the BOD P.E for TP 1. Nevertheless, there has been no justification in the revised report as to how the calculations for the proposed mobile home development increased from 206 P.E to 817 P.E . It would also seem that the effluent discharge rate for TP1 has not included the leisure/spa element of the hotel complex in the overall calculations, which would further increase the loading. I therefore consider there are discrepancies in the P.E. calculations for the proposed development which have not been explained in the revised hydrogeological report. It is clear that that TP 2 is operating at below capacity but it not clear whether the existing TP 1 is operating below capacity, and whether the updated TP 1 plant has been designed for the existing loading and proposed development loading. These were issues raised by the Environmental Technician but have not been comprehensively addressed in the appeal response.
- 8.7.15. Overall based on the nutrient chemical content of the final irrigation pond from the 3 year period samples submitted it is considered to be generally in accordance with the original planning permission levels as stated in the updated hydrogeological report. The 2 soil samples of the former golf course lands indicate that nutrient levels are not high. However, I consider that the proposed development would increase the nutrient load, and that a more comprehensive testing of soil and water samples would provide a more conclusive assessment of the nutrient levels. I therefore do not consider the applicant has adequately addressed the aspects raised in refusal reason No. 4 of the Planning Authority.

8.8. Surface Water

- 8.8.1. Refusal reason No.5 of the P.A, concerned insufficient details being provided to demonstrate that the surface water arising from the development can be satisfactorily managed without having an adverse impact on the adjoining lands, water courses and public road, due to the existing soil conditions, run off risk and proximity to sensitive streams.
- 8.8.2. The first party in their appeal response consider any outstanding matters in this regard could have been dealt with by way of further information. A response from Lohan Donnelly Consulting engineers was submitted with the appeal. It states the surface water strategy for the development proposes a combination of nature based and green SuDs to mimic the natural infiltration process.

Proposed surface water drainage system

- 8.8.3. The subject site is currently not attenuating its surface water, with the existing surface water drainage network flowing via gravity to an existing drainage ditch to the north of the site. It is proposed to split the surface water drainage network for the proposed development into 2 separate systems (referred to as Site A & B) into attenuation ponds.
- 8.8.4. Site A, the larger of the 2 areas would cover an area of 57114m² and would serve 86 mobile home bays and the recreation area in the northern section of the site. The surface water from this network would be discharged into a proposed attenuation pond at the Ballymoney Lower stream to the north of the site. It is proposed to reroute this stream to the rear of the proposed attenuation pond with a gap of 3m, and line the stream so the stream doesn't flood into the attenuation pond. The surface water would flow via gravity through a manhole with the flow rate limited to the existing flow rate of 33.01 l/s. The attenuation pond would have an area of 2661m² to accommodate the total attenuation volume of 785.33m³ allowing for a 1 in 100 year flood event and 20% for climate change. The calculations for Site A have not included the recreation areas and the runoff from the proposed pitch areas and the overall calculation therefore does not include all the impermeable areas.
- 8.8.5. Site B, would cover an area of 9,373m² and would serve 13 mobile bays, and would be located in the southern end of the subject site. The surface water accumulated from site B would be discharged into a proposed attenuation pond in the south

eastern corner of the site. The surface water would flow via gravity into the existing drainage manhole located on Fairway Drive with the flow rate limited to the existing flow rate of 5.4 l/s. The attenuation pond would have an area of 300m² to accommodate the total attenuation volume of 117.59m³ allowing for a 1 in 100 year flood event and 20% for climate change.

Conclusion

- 8.8.6. Whilst I note the SuDs measures have been designed for the 1 in 100 year flood event, given the overall size of this greenfield site, I consider the rerouting of the stream to the north is unnecessary. The proposed development does not include any alternative SuDs features such as green roofs, rainwater harvesting measures, tree pits, permeable paving, or integrated SuDs features throughout the development to meet the existing surface run off rates. It is my opinion there are more alternative SuDs measures that could be incorporated into the development without rerouting the stream at this location.

8.9. Biodiversity

- 8.9.1. Third parties have raised concerns that the proposed development would result in the loss of biodiversity, threaten coastal habitats and the Blue Flag status of Ballymoney Beach and there is insufficient information contained within the Ecological Impact Assessment (EcIA).
- 8.9.2. The subject site is a greenfield site with the existing vegetation primarily along the Ballymore stream, and north and west boundaries. The EcIA submitted with the planning application carried out a number of surveys on the site including a habitat, bird, buildings, and bat survey on a day in July and August. I note limitations in the survey work were identified in the EcIA with regards to only 1 bird survey being carried out and the amphibian survey undertaken outside the optimum breeding period. There was no recording of badgers or otters at the site.
- 8.9.3. Based on the evidence in the EcIA and results from the Ballymoney Stream EIP which commissioned a bat survey in 2021, the Ballymoney stream and woodland area beyond is stated as having the highest level of bat activity and greatest number of bat species at the subject site, for foraging and commuting bats. A night time bat survey was carried out over 3-5 nights in July and August at 4 locations, and there

was no evidence of roosting bats during this time. There was evidence of Common and Soprano pipistrelle and Leisler's bat, at the site, and it is acknowledged these species have a widespread distribution across the region and are showing an increase in their population trend. Mitigation measures are proposed relating to lighting design in the EclA to protect the bats at night.

- 8.9.4. The proposed development would result in an increase in hardstanding areas on the existing grassed area but essentially the existing hedgerow and tree lined boundaries would remain a part of the landscape plan, and subject to best practice measures outlined in the EclA, I do not consider the development during the construction or operational phase would significantly affect the existing biodiversity on the site, with regards to noise or dust.
- 8.9.5. Whilst I note there was no record of roosting bat sites in the woodland area next to the stream, given that the stream has the highest recordings for foraging and commuting bats, and for birds and amphibians, I consider this reinforces my concern regarding it not being the optimum location for the proposed attenuation tank, as outlined in Section 8.8 above as it would involve rerouting the stream, there is the potential for the loss of trees and vegetation and the potential to impact on bats, birds and amphibians noted in this location.
- 8.9.6. The Ballymoney Lower stream flows into Ballymoney Beach c. 760m from the subject site. Based on the applicant's 3 day water sampling at this stream, it has good ecological parameters, and the water quality of the stream is better downstream than upstream. Subject to the surface water being managed and treated at the construction and operational phase of the development, and allowing for dilution I do not consider the proposed development would significantly affect the blue flag status of the beach.

Conclusion

- 8.9.7. I consider the proposed development during the construction phase would be temporary and would not have a significant effect on the biodiversity of the site. Furthermore, mitigation measures outlined in the EclA including the removal of vegetation during the nesting season, retention of existing hedgerows, pollinator and tree planting and the appointment of a qualified ecologist during the amphibian breeding season would benefit the biodiversity of the site. I have mentioned by

concerns about the rerouting of the stream, but overall I consider subject to the proposed landscaping plan being implemented, the use of SuDs measures the development would not have a significant effect once operational on the current biodiversity of this site.

8.10. Other issues

Graveyard

- 8.10.1. Third parties have raised an issue regarding the impact of the development on the graveyard to the west of the subject site, along Ballymoney Road. Given the intervening separation of the graveyard from the subject site, I do not consider the development would impact on the setting of the graveyard.

Pre planning meetings

- 8.10.2. The applicant has submitted copies of pre planning meetings and emails with Wexford County Council over a period from July 2022 up to March 2025 for the development of the overall site, and requests the Commission has regard to these meetings. I note the content of these minutes and emails, and that the current proposal has been substantially reduced in scale from the original pre-planning development. However, the pre-planning consultations that took place does not prejudice the Commission's assessment of the proposed development which has been assessed on its planning merits, having regard to the documentation and submissions received, and relevant planning policies. The pre-planning meetings are not therefore considered to constitute a material planning consideration in the determination of this appeal.

Deficiencies in planning application

- 8.10.3. I note third parties refer to deficiencies in the submitted planning application relating to wayleaves onto the subject lands. However, I am satisfied based on the solicitor's letter submitted with the appeal, that the applicant has provided sufficient evidence of their legal interest for the purposes of the planning application and decision. In any case, this is a matter to be resolved between the parties, having regard to the provisions of s.34(13) of the 2000 Planning and Development Act.

9.0 AA Screening

- 9.1. I have considered the proposal in light of the requirements S177U of the Planning and Development Act 2000 as amended. The subject site is located on a greenfield site in a coastal area, and the closest European Sites are Kilpatrick Sandhills SAC (001742), c.6.34km to north of site, Slaney River Valley SAC (000781), c.8.02km south west of site, Cahore Polders & Dunes SAC (000700), c.13km to south of site, and Seas off Wexford SPA (15.4km) to the south of the site.
- 9.2. The development comprises 99 no. mobile home and recreational facilities. Having considered the nature and location of the project, I am satisfied that it can be eliminated from further assessment because it could not have any effect on a European site. The reason for this conclusion is as follows:
- The nature and location of the development.
 - The separation distance and lack of meaningful connections in addition to the very significant dilution effects of the Irish Sea and the significant dispersal effects from coastal process.
 - The qualifying interests of the SACs and SPAs, which relate to primarily dune and sandbanks environments, wetland and waterbirds, marine mammals, and the conservation objectives pertaining to these sites.
 - The screening determination of the Planning Authority.
- 9.3. 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 (under Section 177V of the Planning and development Act 2000) is not required.

10.0 Water Framework Directive

- 10.1. An assessment of the proposed development has been undertaken with regard to the objectives set out in Article 4 of the EU Water Framework Directive. Having considered the nature, scale, and location of the development, it is concluded that the development will not result in any risk of deterioration in the status of any water

body, including surface waters (rivers and lakes), groundwater, transitional waters, or coastal waters. This applies to both qualitative and quantitative status, and in respect of temporary and permanent effects. In addition, the proposed development will not adversely affect the achievement of established environmental objectives, including the protection, maintenance, and improvement of water body status, as required under the Directive. Accordingly, the proposed development is considered to be compliant with the requirements of Article 4.

11.0 Recommendation

11.1. Having regard to the above, it is recommended that permission be refused for the following reason and considerations.

12.0 Reasons and Considerations

1. Having regard to the designation of Ballymoney as a 'a Small Village, Level 5 Category' in the Core Strategy of the current Wexford County Development Plan 2022-2028, and the general development approach for such settlements, for incremental growth, small in scale and appropriate to the size, scale and character of the village. It is considered the proposed development would be contrary to Objective TM53 and Section 7.7.5 of the Development Plan for tourist accommodation, in that the site is large, is not proportionate in size, appropriate in scale, siting, layout and design to its host settlement and would give rise to the proliferation of caravan parks in the settlement.

2. Given the overall size of the site and number of units proposed and the site's location within a coastal area, the proposed development would have an impact on the existing residential amenities of the surrounding properties in terms of noise, general nuisance, and lighting. The proposed development would set an undesirable precedent for further similar developments at such locations and would, therefore, be contrary to Objective CZM21 and the proper planning and sustainable development of the area

3. The existing Seafield hotel complex and the residential properties contained within the applicant's landholdings are dependent on the existing wellfield providing a reliable, safe, and good quality water supply. In the absence of a comprehensive

yield testing over a period of time, for the existing and proposed development, it is considered the applicant has failed to demonstrate that the proposed development would not affect the current water supply serving the existing development, particularly during peak periods and therefore it is considered the proposed development is premature and presents a risk to public health, and would be contrary to the proper planning and development of the area.

4. Having regard to the documentation submitted with the planning application and appeal, with regards to the upgrading of Treatment Plant (TP1) for the proposed development and existing Seafield Hotel complex, the Commission is not satisfied that the proposed treatment plant system is adequately sized to accommodate the true Population Equivalent (P.E) for both developments particularly during the peak tourist seasons. It is therefore considered that the proposed development would be piecemeal and would be contrary to Objective TM53 and Section 5.7.3 of the Wexford County Development Plan 2022-2028 relating to Caravan Developments, where it must be demonstrated that the proposed wastewater treatment system is suitably designed to cater for the development and would not therefore be prejudicial to public health.

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 me, directly or indirectly, following my professional assessment and recommendation set out in my report in an improper or inappropriate way.

Catherine Dillon
Planning Inspector

14th August 2026

Appendix 1: Form 1 EIA Pre-Screening

Case Reference	PL-500949-WX-26
Proposed Development Summary	Holiday Eco Park consisting of 99 no. mobile home bays (Refer to Section 2.0 for full description).
Development Address	Ballymoney, Courtown, Co.Wexford
IN ALL CASES CHECK BOX / OR LEAVE BLANK	
1. Does the proposed development come within the definition of a 'Project' for the purposes of EIA?	☒ Yes, it is a 'Project'. Proceed to Q.2.
	☐ No, No further action required.
(For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
☐ Yes, it is a Class specified	
☒ No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	

☐ No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994. No Screening required.	
☐ Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	
☒ Yes, the proposed development is of a Class but is sub-threshold.	Class 12 Tourism & Leisure • 12(c) - Holiday villages which would consist of more than 100 holiday homes outside of a built-up area. • 12(d) - Permanent camp sites and caravan sites where the number of pitches would be greater than 100.
4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes ☒	Screening Determination required (Complete Form 3)
No ☐	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ Date: _____

Appendix 2: Form 3 –EIA Screening Determination

A. CASE DETAILS		
An Bord Pleanála Case Reference	PL-500949-WX-26	
Development Summary	Holiday Eco Park consisting of 99 no. mobile home bays with a associated works	
	Yes / No / N/A	Comment (if relevant)
1. Was a Screening Determination carried out by the PA?	Yes	Undertaken and included with planner's report concluding an EIAR was not required.
2. Has Schedule 7A information been submitted?	Yes	EIA screening report with Schedule 7A information accompanied the application.
3. Has an AA screening report or NIS been submitted?	Yes	AA screening report
4. Is a IED/ IPC or Waste Licence (or review of licence) required from the EPA? If YES has the EPA commented on the need for an EIAR?	No	EPA have not been consulted on application. Hydrogeological report states the development does not require a discharge licence as no water is directly discharged to surface or ground water.
5. Have any other relevant assessments of the effects on the environment which have a significant bearing on the project been carried out pursuant to other relevant Directives – for example SEA	Yes	Other assessment include: • Appropriate Assessment Screening Report (Stage 1) • Ecological Impact Assessment Report • Site Specific Flood Risk Assessment • Hydrogeological Assessment & Groundwater Abstraction Report.

		SEA was undertaken by the P.A in respect of Wexford CDP 2022-2-2028	
B. EXAMINATION	Yes/ No/ Uncertain	Briefly describe the nature and extent and Mitigation Measures (where relevant) (having regard to the probability, magnitude (including population size affected), complexity, duration, frequency, intensity, and reversibility of impact) Mitigation measures –Where relevant specify features or measures proposed by the applicant to avoid or prevent a significant effect.	Is this likely to result in significant effects on the environment? Yes/ No/ Uncertain
This screening examination should be read with, and in light of, the rest of the Inspector's Report attached herewith			
1. Characteristics of proposed development (including demolition, construction, operation, or decommissioning)			
1.1 Is the project significantly different in character or scale to the existing surrounding or environment?	Yes	Subject site is on a former golf course site. Although there are a number of caravan parks in the immediate vicinity of the site, the number of caravans proposed in this development would be in close proximity to existing houses.	No
1.2 Will construction, operation, decommissioning or demolition works cause physical changes to the locality (topography, land use, waterbodies)?	Yes	Due to the varying levels across the site there will be an element of cut and fill/soil removal from the site. The project will result in the conversion of open grassland to increased hard surfaces associated with the development & there will be changes to the pattern of surface water run-off.	No

		It is proposed to reroute the Ballymoney Lower stream to the north of the site to accommodate an attenuation pond. Mitigation measures are proposed to avoid adverse effects on the water quality of the stream. Construction to follow guidance from IFI to avoid impacting water leaving the site, use of silt traps etc.. There would be no demolition works involved with the development. Development would change the use of the land from a previous recreational facility to a tourist facility. Development could increase abstraction levels from wellfield. Borehole test indicate adequate Site form wells. Well absatrction results are not conclusive based n the period of samplingo	
1.3 Will construction or operation of the project use natural resources such as land, soil, water, materials/minerals or energy, especially resources which are non-renewable or in short supply?	Yes	Use of water supply from existing wellfield to serve the development. Site underlies a Regionally important aquifer. FWS 24 hour drawdown report submitted indicates stable hydraulic performance of aquifer to supply 400m³ per day, which reflects similar test of boreholes on site carried out in 2003.	Uncertain in the absence of metering readings over a period of time indicating peak/off demand.
1.4 Will the project involve the use, storage, transport, handling or production of substance which would be harmful to human health or the environment?	No	The proposed development does not require any bulk chemical storage and therefore the potential for water quality impact is negligible. Potential leakage of petrol spillage from cars. SuDs measures proposed to prevent silt from run off.	No

1.5 Will the project produce solid waste, release pollutants or any hazardous / toxic / noxious substances?	No	The key potential hazards from the proposed development are suspended solids, spillages, and accidental emissions of potential pollutants to surface water or groundwater causing deterioration in water quality. Soil samples indicate the soils have low nutrient levels.	No
1.6 Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	Yes	Pollutant levels in ICW & ponds could impact on ground water. Water quality & soil test samples indicated as good. The surface water management system has been designed to capture surface water generated at the project site and discharge water at greenfield runoff rates. Water quality samples tested in the north & south streams are indicated as being good. The construction phase of the development will take account of CIRIA guidance to ensure surface water is adequately treated and will eliminate any risk of polluted surface water being discharged from the project site.	No
1.7 Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	Yes	Noise during the construction period, although this would be temporary (12-15 months). Noise & light spillage during the operational phase from future users of the development. An ecological buffer is proposed to deter human encroachment into the riparian area.	No
1.8 Will there be any risks to human health, for example due to water contamination or air pollution?	Yes	Construction activity is likely to give rise to dust emissions, but these would be temporary in nature and localised.	No

		Potential for contamination of groundwater, & reduction in water supply and quality. Water sampling submitted indicates water quality is currently good. Report on 24 -Hour Step drawdown of borehole on site indicates the development can provide 400m3 of water per day to service the existing development and proposed development.	
1.9 Will there be any risk of major accidents that could affect human health or the environment?	No	Subject to best construction measures risk of spillage of fuel, lubricants and concrete would be avoided.	No
1.10 Will the project affect the social environment (population, employment)	Yes	There may be some localised temporary employment during the construction & operational phase of the development.	No
1.11 Is the project part of a wider large scale change that could result in cumulative effects on the environment?	Yes	Proposed development would increase the number of caravan units by a further 38% within the immediate vicinity of Ballymoney village.	No
2. Location of proposed development			
2.1 Is the proposed development located on, in, adjoining or have the potential to impact on any of the following: - European site (SAC/ SPA/ pSAC/ pSPA) - NHA/ pNHA - Designated Nature Reserve - Designated refuge for flora or fauna - Place, site or feature of ecological interest, the preservation/conservation/ protection of which is an objective of a development plan/ LAP/ draft plan or variation of a plan	No	The site is not located in, or adjoining any European site, or any designated or proposed NHA. Kilpatrick Sandhills SAC is c.6.34km to N.E of site Cahore Marshes SPA is c.13km to South of site. Seas off Wexford SPA is c.15km to the south of the site. Ballymoney Lower stream to the north of the site flows into Ballymoney Strand pNHA, c.760m to the east of the site.	No

		Best practice construction measures are proposed during the operational phase. Mitigation measures during the operational phase include an attenuation & surface water strategy and landscape plan to minimise surface water run off into the watercourse. There are no County Geological sites in the vicinity of the proposed development and the site is not within a conservation area or within a protected view. There is an established graveyard to the west of the site, but given the intervening separation, the proposed development is unlikely to impact the setting of the graveyard.	
2.2 Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, for example: for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the project?	Yes	The site comprises modified grasslands, dry meadows, scrub & hedgerows, treelines and areas of mixed broadleaf woodlands. The EclA included surveys carried out at the site for birds and bats in July and August 2025. The bat survey was carried out over 2 nights in June, 5 nights in July & 7 nights in August. The Ballymoney stream which traverses the northern part of the site, is identified as a habitat of county ecological importance (Rating C) supporting riparian vegetation and providing commuting & foraging for bats and birds. <u>Bats</u> The EclA identified the presence of bat activity along hedgerows and at the Ballymoney stream which provided foraging and commuting routes. The existing building on the site, close to the proposed entrance was identified as having moderate roost potential, but no bats were	No- subject to best practice measures

		observed emerging from the building during the survey. No works are proposed to this building as part of the development. <u>Birds</u> The EclA also identified evidence of limited breeding and no foraging habitats for a no. of namely the Common Scoter, Great Spotted Woodpecker, Pheasant, Red throated Diver, Sparrow hawk, Swallow Woodcock. Definite breeding for the Goldcrest & Moorhen were noted. <u>Amphibians</u> A number of protected species were recorded in the NBDC for rare and threatened species within the vicinity of the site. <u>Badgers</u> There was no evidence of badgers detected on the site, but here is the potential for foraging & breeding habitat associated with the woodland area to the north of the subject site. <u>Other mammals</u> The woodland area to the north of the Ballymoney stream was identified for foraging and breeding habitat for hedgehog and limited breeding for the pine marten. Lighting plan to be designed to minimise light spill to woodland area during construction & operational phase. Removal of vegetation to be carried avoided during nesting season.	
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		Mitigation measures are proposed for clearance works for the attenuation pond during Feb- Sept, including a pre-construction survey to be carried out by a qualified ecologist, and in the event of translocated of habitat under licence by NPWS. Rerouting of Ballymoney stream for the attenuation pond would be informed by ecological surveys during the appropriate season and in compliance with consultation with IFI. Mitigation measures are proposed in the EcIA during the construction phase of the development regarding dust on fauna in Section 5.3 of the EcIA.	
2.3 Are there any other features of landscape, historic, archaeological, or cultural importance that could be affected?	No	There are no landscape or protected scenic views at the site. There are no protected structures or architectural conservation area designations at the site. The site is located within a coastal zone as identified in the CDP as being sensitive to development. There are no recorded monuments at the site.	No
2.4 Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, for example: forestry, agriculture, water/coastal, fisheries, minerals?	No	There are no such resources on or close to the site.	No
2.5 Are there any water resources including surface waters, for example: rivers, lakes/ponds, coastal or groundwaters which could be affected	Yes	A section of the north area of the site is located within Flood Zone A, but there is no development proposed in this area.	No

by the project, particularly in terms of their volume and flood risk?		It is proposed to reroute Ballymoney Lower stream located in the northern section of the site. Section 5.3.1 of the EclA proposes mitigation measures to minimise impacts to water courses. Dangerous substances such as oils, fuels etc will be stored in a bunded zone. The development will implement SUDS measures to control surface water run-off. A detailed Construction Environmental Management Plan (CEMP) will be prepared and include all relevant mitigation measures identified in the EclA report.	
2.6 Is the location susceptible to subsidence, landslides or erosion?	No	There is no evidence of these risks on the site	No
2.7 Are there any key transport routes(eg National primary Roads) on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	No	The main route to the site is via the Ballymoney Road, which connects to Courtown & Gorey, and links to the R742 and M11. During the construction and operational phase of the development the development would increase the level of traffic along the Ballymoney Road and Fairway Drive. The Transport Statement concludes that the surrounding network has the capacity to accommodate the increased traffic volume associated with the development.	No
2.8 Are there existing sensitive land uses or community facilities (such as hospitals, schools etc) which could be affected by the project?	No	There are no sensitive community facilities such as hospitals or schools , in close proximity to the site that could be affected by the proposed development.	No

3. Any other factors that should be considered which could lead to environmental impacts

3.1 Cumulative Effects: Could this project together with existing and/or approved development result in cumulative effects during the construction/ operation phase?	No	No existing or approved planning permissions in the vicinity of the site have been noted in the application documentation, in the AA and EIAR screening report. No cumulative effects on the area are reasonably anticipated.	No
3.2 Transboundary Effects: Is the project likely to lead to transboundary effects?	No	There are no transboundary effects arising.	No
3.3 Are there any other relevant considerations?	No	No	No

C. CONCLUSION

No real likelihood of significant effects on the environment.	✓	EIAR Not Required
Real likelihood of significant effects on the environment.	☐	

D. MAIN REASONS AND CONSIDERATIONS

Having regard to: -

1. The criteria set out in Schedule 7, in particular
 - (a) the nature and scale of the proposed development, which is just below the threshold in respect of Class 12(c) and (d) of the Planning and Development Regulations 2001, as amended.
 - (b) the absence of any significant environmental sensitivity in the vicinity of the site.
 - (c) the location of the development outside any sensitive location specified in article 109 (4)(a) of the Planning and Development Regulation's 2001 (as amended).

2. The results of other relevant assessments of the effects on the environment submitted by the applicant including an Appropriate Assessment Screening (Stage 1), Ecological Impact Assessment, and Environmental Impact Screening report provided in support of the application.
3. The features and measures proposed by the applicant envisaged to avoid or prevent what might otherwise have been significant effects on the environment.

The Coimisiún concluded that the proposed development would not be likely to have significant effects on the environment, and that an environmental impact assessment report is not required.

Inspector: _____

Date: _____

Approved DP/ADP: _____

Date: _____

Appendix 3: AA Screening

Screening for Appropriate Assessment Test for likely significant effects	
Case Reference Number: PL-500949-WX-26	
Step 1: Description of the project and local site characteristics	
Brief description of project	Holiday Eco Park consisting of 99 no. mobile homes bays, communal amenity areas, 214 no. car parking spaces, 32 bicycle parking spaces and all associated site works. (Refer to Section 2 of this report for detailed description)
Brief description of development site characteristics and potential impact mechanisms	The site has an overall site area of 6.68ha and forms part of the former golf course associated with the Seafield hotel complex. The site is not located in, or adjoining any European site, or any designated or proposed NHA. Kilpatrick Sandhills SAC is c.6.34km to N.E of site & Cahore Marshes SPA is c.13km to South of site. Seas off Wexford SPA is c.15km to the south of the site. The site levels vary across the site and the site falls towards the northern boundary of the site towards the Ballymoney Lower stream which runs in an east west direction and enters the sea at Ballymoney Strand a pNHA c.760m to the east. Duration of work 12-15 months.
Screening report	Yes, screening report provided by applicant and prepared by Minogue Environmental Consulting (MEC) Ltd.
Natura Impact Statement	No
Relevant submissions	Observer raises concerns raises concerns about risk to pNHA, threat to coastal habitats & species, and pollution to nearby streams.

Step 2. Identification of relevant European sites using the Source-pathway-receptor model

It is noted that the applicant's stage 1 AA screening report identified 7 European sites as being within a potential zone of influence of the proposed development. These sites include:

- Kilpatrick Sandhills SAC (001742), c.6.34km to north east of site
- Slaney River Valley SAC (000781), c.8.02km south west of site
- Cahore Polders & Dunes SAC (000700), c.12.96km to south of site
- Blackwater Bank SAC (002953), c.16.43km to south east of site
- Buckronev-Brittis Dunes & Fen SAC (000729), c. 18.73km to north of site
- Kilmuckridge-Tinnaberna Sandhills SAC (001741), c.19.4km to south of site
- Cahore Marshes SPA (004143), c.13km to south of site
- Seas off Wexford cSPA (004237) c.15.4km to the south of the site.

Ballymoney Strand is a pNHA c.760m to the east of the site.

Having regard to the nature of the development, scale, separation distance and lack of substantive ecological linkage between the subject site and other Natura 2000 sites I agree that no further range of European sites is necessary in this instance.

European Site (code)	Qualifying interests ¹ Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections ²	Consider further in screening ³ Y/N
Kilpatrick Sandhills SAC (001742)	Annual vegetation of drift lines [1210] Embryonic shifting dunes [2110] Shifting dunes along the shoreline (white dunes) [2120] Fixed coastal dunes (grey dunes) [2130] Atlantic decalcified fixed dunes [2150]	c.6.3km to north of site	This SAC is located in the Avoca Varty catchment which is separate to the subject site and there is no hydrological pathway connecting the project to this SAC.	No

	ConservationObjectives.rdl			
Slaney River Valley SAC (000781)	Estuaries [1130] Mudflats and sandflats not covered by seawater at low tide [1140] Atlantic salt meadows [1330] Mediterranean salt meadows [1410] Water courses of plain to montane levels [3260] Old sessile oak woods with Ilex [91A0] Alluvial forests [91E0] Freshwater Pearl Mussel [1029] Sea Lamprey[1095] Brook Lamprey [1096] River Lamprey[1099] Twaite Shad [1103] Salmon [1106] Otter [1355] Site specific cons obj	c.8.02km to south west of site	The SAC is located in the Slaney & Wexford harbour catchment, separate to the subject site. No hydrological connection between the subject site and SAC.	No
Cahore Polders and Dunes SAC (000700)	Annual vegetation of drift lines [1210] Embryonic shifting dunes [2110] Shifting dunes along the shoreline (white dunes) [2120]	c.12.96km to south of site	This SAC is located in the sub catchment of Cahore SC10, separate to the subject site. No direct impacts. Weak indirect hydrological pathway	Yes

	Fixed coastal dunes (grey dunes) [2130] Humid dune slacks [2190] CO002953.pdf		from deterioration of surface water in Ballymoney Lower stream & Ballyscartin stream into Irish Sea.	
Blackwater Banks SAC (002953)	Sandbanks which are slightly covered by sea water all the time [1110] Harbour Porpoise [1351] CO002953.pdf	c. 16.43km to south east of site	This SAC is located offshore in a marine environment of the Irish Sea. Weak indirect hydrological pathway from deterioration of surface water in Ballymoney Lower stream & Ballyscartin stream into Irish Sea.	Yes
Buckroneys Brittas Dunes and Fen SAC (000729)	Annual vegetation of drift lines [1210] Perennial vegetation of stony banks [1220] Mediterranean salt meadows [1410] Embryonic shifting dunes [2110] Shifting dunes along the shoreline (white dunes) [2120] Fixed coastal dunes (grey dunes) [2130] Atlantic decalcified fixed dunes [2150]	c.18.73 km to north of site	This SAC is located in the Avoca Vartry catchment. Given the distance, the assimilative capacities of the receiving waters and the location of the site, no hydrological connection exists.	No

	Dunes with <i>Salix repens</i> ssp. <i>argentea</i> [2170] Humid dune slacks [2190] Alkaline fens [7230] ConservationObjectives.rdl			
Kilmuckridge-Tinnaberna Sandhills SAC (001741)	Embryonic shifting dunes [2110] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] CO001741.pdf	c.19.4km to south of site	This SAC is located in the sub catchment of Cahore SC10, separate to the subject site. No direct impacts. Indirect effects from deterioration of surface water form construction activities & foul and surface water.	Yes
Cahore Marshes SPA (004143)	Golden Plover [A140] Lapwing [A142] Greenland White-fronted Goose [A395] Wigeon [A855] Wetland and Waterbirds [A999] CO004143.pdf	c.13km south of site	Based on EcIA survey carried out in August 2015, the site is not important for or relied upon by special conservation interest birds species.	Yes
Seas off Wexford SPA (004237)	Red-throated Diver [A001] Fulmar [A009] Manx Shearwater [A013]	c.15km to the south	Based on EcIA survey the site is not relied upon for breeding or	Yeso

	Gannet [A016] Cormorant [A017] Shag [A018] Common Scoter [A065] Mediterranean Gull [A176] Black-headed Gull [A179] Lesser Black-backed Gull [A183] Herring Gull [A184] Kittiwake [A188] Roseate Tern [A192] Common Tern [A193] Arctic Tern [A194] Guillemot [A199] Razorbill [A200] Puffin [A204] Sandwich Tern [A863] Little Tern [A885] CO004237.pdf		food resource for the seabirds.	
¹ Summary description / cross reference to NPWS website is acceptable at this stage in the report ² Based on source-pathway-receptor: Direct/ indirect/ tentative/ none, via surface water/ ground water/ air/ use of habitats by mobile species ³ if no connections: N				
Step 3. Describe the likely effects of the project (if any, alone <u>or</u> in combination) on European Sites The proposal would not result in any direct effects on any of the identified sites, however, there is a connection via the surface water network and waste water treatment system to the Irish Sea.				

The application was accompanied by SuDs features which include an attenuation pond and treatment to surface water run off. I have commented on the proposed SuDs features in 8.8 of this report.

I have commented on the capacity of the upgrade to TP 1 in 8.7 of this report. There is a risk that untreated effluent could be discharged in the event that peak capacity is exceeded. However, the marine outfall would be subject to the very significant dilution and dispersal effects of the Irish Sea and having regard to the distance to the closest SACs and SPAs, in addition to their qualifying interests, I consider it extremely unlikely that there would be effects beyond the immediate area of the subject site/outfall. I am therefore satisfied that there would be no significant effects on the qualifying interests of the SACs or SPAs having regard to the nature of the development, the potential impact mechanisms and the relevant conservation objectives.

AA Screening matrix

Site name Qualifying interests	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
	Impacts	Effects
Site 1: Cahore Polders and Dunes SAC (000700) QI list as above	Direct: No direct impacts identified Indirect Indirect impacts from deterioration in water quality arising from construction activities and discharge of foul & surface water.	Significant effects can be ruled out having regard to the distance to the SAC, the nature of the qualifying interests and their conservation objectives. Given the separation distance involved, marine character of the Irish Sea, it is considered natural dilution would occur.
	Likelihood of significant effects from proposed development (alone) : No	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? No	
	Impacts	Effects
Site 2: Blackwater Banks SAC (002953) QI list as above	As above	As above

	Likelihood of significant effects from proposed development (alone): Y/N	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects?	
	Impacts	Effects
Site 3: Kilmuckridge-Tinnaberna Sandhills SAC (001741) QI list as above	As above	As Above
	Likelihood of significant effects from proposed development (alone) : No	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? No	
	Impacts	Effects
Site 4: Cahore Marshes SPA (004143)	Direct: No direct impacts identified for this SPA Indirect: Water quality, noise, habitat loss	Significant effects can be ruled out having regard to the distance to the SPA, the nature of the qualifying interests and their conservation objectives. Given the separation distance involved, marine character of the Irish Sea, it is considered natural dilution would occur.
	Likelihood of significant effects from proposed development (alone) : No	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? No	

	Impacts	Effects
Site 5: Seas off Wexford SPA (004237)	As above	As above
	Likelihood of significant effects from proposed development (alone) : No	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? No	
Step 4: Conclude if the proposed development could result in likely significant effects on a European site		
Having regard to the information contained within the Applicant’s Screening Assessment, my site inspection, a review of the conservation objectives and supporting documents, and adopting a precautionary principle, I consider that the proposed development would not result in any significant effects on any of the identified European Sites. No mitigation measures have been relied on in coming to this conclusion.		
Screening Determination		
Finding of no likely significant effects		
In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on the European sites in and along the Irish Sea in view of the conservation objectives of these sites and is therefore excluded from further consideration.		
This determination is based on:		
• The nature and location of the development. • The separation distance and lack of meaningful connections in addition to the very significant dilution effects of the Irish Sea and the significant dispersal effects from coastal process. • The qualifying interests of the SACs and SPAs, which relate to primarily dune and sandbanks environments, wetland and waterbirds, marine mammals, and the conservation objectives pertaining to these sites. • The screening determination of the Planning Authority.		

Appendix 4: Water Framework Directive Assessment

WFD IMPACT ASSESSMENT STAGE 1: SCREENING				
Step 1: Nature of the Project, the Site and Locality				
An Bord Pleanála ref. no.	PI 500949-WX-26	Townland, address	Ballymoney, Courtown, Co.Wexford	
Description of project		Holiday Eco Park consisting of 99 no. mobile home bays, with a communal area (4.3ha), 214 no. car parking spaces, 32 no. bicycle parking spaces and all associated works. Overall site area of 6.68ha.		
Brief site description, relevant to WFD Screening		Lands are located in a rural coastal area to the south east of Ballymoney village. The lands include the Seafield Hotel & spa complex, 3 housing developments, wedding/conference centre, golf club house, and 64 holiday apartments associated with the hotel. The site formed part of the Seafield Golf Club lands which closed in 2015, and the lands have fallen into disuse with areas no longer managed. Ballymoney Lower stream flows along the northern boundary of the site and discharges into the sea, c. .760m to the east. A further stream known as Ballyscartin flows beyond the southern boundary of the site into the sea. Soil maps indicate a high run off risk, clayey and poorly draining soil.		
Proposed surface water details		Surface water strategy for the development proposes two separate water drainage networks. The site is split into two sections, referred to as site A (northern part of site) and site B (southern end of site which is much smaller than A). Site A: Surface water from this network would be discharged into an attenuation pond and would reroute the Ballymoney Lower stream before discharging into sea. This area covers a catchment area of 57,114m².		

	Site B: Surface water from this area would be discharged into an attenuation pond, in south eastern end of site and would be pumped into an existing surface water manhole located in Fairview Drive at a limited rate. This existing surface water infrastructure is not taken in charge by the Council.
Proposed water supply source & available capacity	Private water supply for proposed development which currently serves neighbouring housing estates in Hillview, Fairways, Beach Walk and the Hotel & Spa complex. Site is underlain by a regionally important aquifer, with the general flow from west to east towards the sea. There are 5 production boreholes on site operating as a wellfield. They are managed and operated together as a single, integrated source. Borehole testing indicates the aquifer is capable of yields of 400m³/day. Water quality samples indicated as good.
Proposed wastewater treatment system & available capacity, other issues	There is currently a treatment plant (TP1) which serves the existing hotel complex located to the south of the hotel complex in a maintenance/agricultural yard. It is proposed to upgrade this treatment plant and connect it to the proposed development. P.E capacity is not specified of the existing TP plant. New TP is a 'play & plug' system and can cater for between 50-5000 P.E TP 2 is located to the east of the subject site and currently serves the existing housing developments on the Seafeld estate. It has a capacity of 1,000 P.E. It is proposed to modify convert one of the plants at this location into a balance tank/pump chamber to balance the flow at peak times. TP 2 P.E will be reduced to 500 P.E.. Waste Water system comprises an Integrated Construction Wetland system. Existing constructed wetland on site, with holding pond and lower irrigation pond used to irrigate the former golf course.
Others?	In appeal response applicant has submitted following information: • Historic hydrogeologist report (2003) & revised hydrogeological assessment. • Report on 24 hour step drawdown for a borehole on the site with water quality sampling at Borehole 3 & water quality analysis.

			• Seafield Estate Waste Water Treatment Service & Maintenance records for 2023-2025. • Soil Quality report carried out on 24/2/2026. Third parties have raised concerns regarding water supply, water quality, and maintenance of the WWTP.			
Step 2: Identification of relevant water bodies and Step 3: S-P-R connection						
Identified water body	Distance to (m)	Waterbody Name(s) (code)	WFD Status	Risk of not achieving WFD Objective e.g at risk, review, not at risk	Identified pressures on that waterbody	Pathway linkage (e.g surface water run off, drainage, groundwater)
River waterbody	0m	Ballymoney_Lower_010 IE_SE_11B490430	Good	Review	None identified.	Yes-via surface water via attenuation pond
Groundwater body	Underlying site	Gorey IE_SE_G_071	Good	Review	None identified	Yes- regionally important aquifer Abstraction for water supply Potential for untreated effluent & irrigation system to soil
Coastal	c. 830m	South Western Irish Sea (HAs 11;12) IE_SE_010_0000	Good	Not at risk	None identified	Yes- via surface water run off via Ballymoney stream & Ballyscartin

Step 3: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.

CONSTRUCTION PHASE

No.	Component	Water body receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screening Stage Mitigation Measure*	Residual Risk (yes/no) Detail	Determination** to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' in or 'uncertain' proceed to Stage 2.
1.	Surface	Ballymoney Lower -010 IE_SE_11B490 430	Via surface water/clay soils	Earthworks, Silt & sediment from stockpiles, hydrocarbon spillages & leakages for fuel/oil/concrete & chemicals.	Best practice construction practices SuDs measures/features	No	No- Water sampling carried out as part of the planning application indicate surface water quality is good. Site is not subject to flooding except to north where no development is proposed.
2.	Ground	Gorey IE_SE_G_071	Via underlying aquifer & indirect pathway to surface water	Excavation & levelling of site could increase aquifer vulnerability for contamination due to spillages etc.	Best practice measures proposed including storage of compounds etc..	No	No- GSI indicates the site is located in an area at a low risk of groundwater contamination.

3.	Coastal	South Western Irish Sea (HAs 11;12) IE_SE_010_00 00	Via surface water streams Ballymoney & Ballyscartin both of which flow to sea	As above	As above		No- due to separation distance & allowing for dilution
OPERATIONAL PHASE							
3.	Surface	Ballymoney Lower -010 IE_SE_11B490 430	Via surface water into streams	Hydrocarbon spillages	Surface water to be attenuated		Screened out- No discharge to surface water
4.	Ground	Gorey IE_SE_G_071	Underlying aquifer & spreading of effluent from IWS	Contamination of ground water			Uncertain- Depends on capacity of WWTP & discharge of effluent
5.	Coastal	South Western Irish Sea (HAs 11;12) IE_SE_010_00 00	No direct pathway	spillages			Screened out – due to separation distance/SuD features
DECOMMISSIONING PHASE							
	N/A						