



APPENDIX 2-2

SCOPING RESPONSES



Rialtas na hÉireann
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Comhairle Contae
Ros Comáin
Roscommon
County Council



The Hodson Bay Waterfront Park Project is co-funded by the Government of Ireland and the European Union through the EU Just Transition Fund

Michael Lough

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Friday 27 June 2025 14:40
To: Killian McGovern
Cc: Feargal Lennon; Housing Qcsofficer
Subject: RE: 241220 - Scoping Letter - Hodson Bay Waterfront Park and Marina Redevelopment

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Your Ref: 241220

Our Ref: G Pre00217/2025

(Please quote in all related correspondence)

Good afternoon Killian,

On behalf of the Department of Housing, Local Government and Heritage, I acknowledge receipt of your recent consultation.

Please note, Development Applications Unit (DAU) is the coordinating unit for the Department of Housing, Local Government and Heritage, coordinating responses/submission from National Parks and Wildlife Service, National Monuments Service, Architectural Heritage and Underwater Archaeology Unit.

All correspondence in relation to preplanning consultations is to be issued to Development Applications Unit. Duplicates of this correspondence should not be sent to other email addresses such as the Department's Nature Conservation or National Monuments Service email addresses as this causes unnecessary confusion.

In the event of observations, you will receive a co-ordinated heritage-related response by email from Development Applications Unit (DAU).

The normal target turnaround for pre-planning and other general consultations is six weeks from date of receipt. In relation to general consultations from public bodies under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 to 2011, the Department endeavours to meet deadline dates, where requested.

If you have not heard from DAU and wish to receive an update, please email: manager.dau@npws.gov.ie

Regards,

Brian Bone
Executive Officer

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

Aonad na nIarratas ar Fhorbairt
Development Applications Unit

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

From: Killian McGovern <kmcgovern@mkoireland.ie>
Sent: Friday 27 June 2025 14:20
To: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Cc: Feargal Lennon <flennon@mkoireland.ie>
Subject: 241220 - Scoping Letter - Hodson Bay Waterfront Park and Marina Redevelopment

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Dear Sir or Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed redevelopment of the Hodson Bay waterfront park and marina located in Barrymore, Co. Roscommon. The applicant for the proposed development is Roscommon County Council in conjunction with Waterways Ireland.

The proposals will include for the construction of a new Water Sports Pavillion as well as a continuous promenade along the lakeshore and landscaped Marina Plaza Space. The proposals also include the redevelopment of the existing Waterways Ireland marina at Hodson Bay. It is proposed that the visitor experience at Hodson Bay will be enhanced through the proposed development which will focus on the improvement and redevelopment of the shoreline and providing public access to the River Shannon, creating a pedestrian priority environment.

The details of the proposed development are outlined in the attached Scoping Document and Cover Letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind regards,
Killian.

Killian McGovern BSc. (Env)
Environmental Scientist

MKO

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Michael Lough

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Friday 8 August 2025 12:34
To: Killian McGovern
Cc: Feargal Lennon
Subject: Your Ref: 241220 Our Ref: G Pre00217/2025 Re: EIA Scoping Document for proposed Hodson
Attachments: G Pre002172025.pdf

Some people who received this message don't often get email from manager.dau@npws.gov.ie. [Learn why this is important](#)

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A Chara,

Attached please find the archaeological and nature conservation observations/recommendations of the Department in relation to the aforementioned EIA Scoping Consultation.

Can you please confirm receipt of same?

Kind Regards,
Sinéad

Sinéad O' Brien
Executive Officer

Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90
Newtown Road, Wexford, County Wexford Y35 AP90



Your Ref: 241220

Our Ref: **G Pre00217/2025** *(Please quote in all related correspondence)*

8 August 2025

Killian McGovern
Environmental Scientist
MKO
Tuam Road
Galway
H91 VW84

Via email: kmcgovern@mkoireland.ie cc: flennon@mkoireland.ie

Re: Environmental Impact Assessment (EIA) Scoping Document for proposed Hodson Bay Waterfront Park and Marina Redevelopment at Barrymore, County Roscommon

A Chara

I refer to correspondence received in connection with the above.

The Department welcomes this opportunity to provide observations at this early stage. Outlined below are heritage-related observations/recommendations of the Department under the stated headings.

Archaeology

The following observations and recommendations are provided to guide further preplanning consent application archaeological assessment methodologies to inform the Environmental Impact Assessment Report (EIAR) and align the project with State legal codes, guidelines and policies for the protection of archaeological heritage. It is noted that Section 2.2.3 of the EIAR scoping document notes that “There are two known Recorded Monuments located within the immediate vicinity of the Proposed Development. These are the causeway of Barrymore townland (RO049-0050002), and an enclosure (RO049-010) to the north of the Proposed Development site. The potential for cultural heritage effects will be assessed as part of the EIAR process”.

Lough Ree boasts a rich and varied cultural heritage that has been extensively documented in *Lough Ree: Historic Lakeland Settlement* (B. Cunningham and H. Murtagh (eds.) 2015). Its underwater cultural heritage, including submerged wrecks, logboats and archaeological objects, forms a key part of its cultural heritage that requires careful consideration within the EIAR. Lough Ree contains a rich and diverse cultural heritage that includes:



- Archaeological monuments, within/in the environs of the proposed development area, recorded in the Record of Monuments and Places (RMP)/Sites and Monuments Record (SMR) RO049-005002- : Causeway, RO049-005001- : Redundant record, RO049-006---- : Redundant record, RO049-010---- : Enclosure - large enclosure. Their locations are recorded on the National Monuments Service Historic Environment Viewer.
- Historic Shipwrecks recorded in the Wreck Inventory of Ireland Database (WIID). The WIID contains records of wrecking events within Lough Ree. The positions of two wrecks have been located and can be seen on the National Monuments Service Wreck Viewer¹. In addition, a series of logboats have been discovered in the lake.
- Archaeological objects recorded in the National Museum of Ireland Topographical Files.
- Underwater cultural heritage assets, including lacustrine built heritage structures and features (e.g. wharfs, piers, boat houses,), fishing heritage structures and features, archaeological discoveries made from prior marine geophysical surveys, excavations and other investigations, and potential submerged palaeolandscapes.

Legal Codes and Policy Context

Archaeological monuments are afforded statutory protection in the Record of Monuments and Places (RMP) established under Section 12 (Recorded Monuments) of the National Monuments (Amendment) Act 1930-2014. The *Frameworks and Principles for the Protection of the Archaeological Heritage* (Department of Arts, Heritage and the Gaeltacht and the Islands 1999, see Sections 3.6.1(3) and 3.6.4) sets out national policy on the protection of the archaeological heritage in the course of development. It emphasises the non-renewable nature of the archaeological heritage and the need to always consider preservation *in-situ* as the first option. To inform archaeological mitigation strategies that ensure preservation *in-situ* are prioritised, appropriate levels and forms of archaeological assessment are required in advance of development. Advance, early-design stage, pre consent/planning application, archaeological assessment and preplanning submission and pre construction stage mitigation is key to diminishing effects on archaeological heritage.

Section 3 of the National Monuments (Amendment) Act 1987 is the primary piece of legislation for the protection of wrecks over 100 years old and archaeological objects underwater, irrespective of age. Wrecks that are less than 100 years old and archaeological objects underwater or the potential location of such a wreck or archaeological object can also be protected under Section 3 of the 1987 (Amendment) Act. Underwater cultural heritage also encompasses a broad range of marine heritage, the protection of which is provided for in legal codes. The Wreck Inventory of Ireland Database (WIID) is the official register of historic shipwrecks protected under the National Monuments Acts. All wrecks over 100-years

¹ <https://www.archaeology.ie/advice-and-support/locate-a-monument-or-wreck/wreck-viewer/>



old are protected under the 1987 and 1994 (Amendment) Acts of the National Monuments Acts. Over 18,000 wrecks have been recorded to date, ranging from small fishing boats, dugout canoes and coastal traders to steamships and ocean going ships. Though earlier sources have been included where obtainable, the Inventory is largely based on documentary sources available from after 1700 AD. As such, previously unrecorded wreck sites, including those dating to earlier periods, may await discovery in the marine area under consideration here.

The National Planning Framework² states that ‘the protection of archaeological heritage is recognised as a core component to achieving sustainable development’ and National Policy Objective 89 is to ‘Protect, conserve and enhance the rich qualities of natural, cultural and built heritage of Ireland in a manner appropriate to their cultural and environmental significance. The National Marine Planning Framework³ includes the statement that:

‘Proposals unable to contribute to the protection of the significance of heritage assets will only be supported if they demonstrate that they will, in order of preference, avoid, minimise, or mitigate harm to the significance of heritage assets. If it is not possible, to avoid, minimise or mitigate harm, then the public benefits for proceeding with the proposal must outweigh the harm to the significance of the heritage assets. Proposals should consider the potential impact of their application on heritage assets from the earliest stages of project development, taking into account the potential risk of damage to, or degradation of, assets. Expert advice will be required at all stages to inform the development of the proposals. Such proposals may include plans to avoid locations where heritage assets may be located, or to minimise compromise or harm through the use of less invasive construction techniques. Proposals should consider evidence for the level of significance of a heritage asset, including information and advice from relevant regulators and advisors, and on how they are managed. This applies to both identified heritage assets and the potential for such assets to be discovered during development or activity’ (National Marine Planning Framework, 89).

Obligations regarding the protection of archaeological heritage are further strengthened under Part 9, Section 171 (1) of the Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023, which requires Public Authorities to have regard to historic heritage in the performance of their respective functions.

It is further noted that the Roscommon County Development Plan 2022-2028 includes policies relating to the protection of archaeological heritage (Section 9.7).

Scope of Cultural Heritage Assessment for Hodson Bay Waterfront Park and Marina Redevelopment

In light of the above cultural heritage context to the proposed development area and the need to align it with State legal codes and policies for the protection of archaeological heritage, the

² <https://cdn.npf.ie/wp-content/uploads/National-Planning-Framework-First-Revision-April-2025-1.pdf>

³ <https://assets.gov.ie/139100/f0984c45-5d63-4378-ab65-d7e8c3c34016.pdf>



Department advises that the following specific investigations are undertaken prior to applying for planning approval, in order to inform the engineering and architectural design of the development; to facilitate identification of likely significant effects on cultural heritage, including underwater archaeology; to maximise the preservation *in-situ* of cultural heritage by design; and to inform the contents of the Cultural Heritage Assessment in the EIAR (where relevant) and its attendant mitigation proposals.

A desk based assessment should address the cultural heritage (archaeological, built, vernacular, lacustrine built heritage) of the proposed development area, to include a full inventory, mapping and surveys of all assets identified by field inspections, cartographic analysis, historical and archival research and from a review of prior archaeological investigations. The field survey should include a visual inspection of any lakebanks and lakebeds and other waterbodies, where they are visible. This is best carried out following vegetation clearance (where permitted) or during winter, when vegetation cover is less dense. The desk-study, supported by comprehensive archival and historical research and detailed field inspection should inform (as appropriate), the scope and range of further archaeological investigations to be undertaken. These should include as a minimum:

- Targeted non-intrusive advance/pre consent geophysical survey or prospection (where practicable) of all areas where significant ground disturbances or in-lake works are proposed.
- Targeted advance/pre consent archaeological test excavation (where practicable) of areas of archaeological potential identified in the desk study and/or by advance geophysical surveys.
- Advance/pre consent Underwater Archaeological Impact Assessment (UAIA), to include dive/wade, metal detection surveys of all areas where underwater/in-lake works are proposed. The UAIA may include targeted underwater pre-development test-excavations within specific areas of the proposed development area, to be agreed with the National Monuments Service, in order to adequately assess the nature, depth, extent and artefact-bearing potential of the lacustrine stratigraphy, to assess the potential for the remains of wrecks, logboats, lacustrine structures and features, and to facilitate further characterisation of underwater cultural heritage features and structures that have been identified in the prior dive/wade surveys and by prior research.
- Comprehensive advance/pre consent assessment of impacts on the setting of archaeological and built heritage monuments, structures and the historic landscape.
- Identification of opportunities within the design of the proposed development to enhance the setting and interpretation of heritage within the project area and its environs.



- All intrusive advance investigations (such as, but not limited to, ground investigations for soils/geology/hydrogeology) carried out as part of the EIA or design process should be subject to advance archaeological screening (to be agreed with the National Monuments Service) and a programme of archaeological monitoring by a suitably qualified Archaeologist.

Archaeological test-excavations and monitoring will be carried out under a Section 26 (National Monuments Act 1930) licence from the National Monuments Service and in accordance with an approved Method Statement. Licensed metal detection will be undertaken in tandem with the test excavations. A Dive/Survey Licence (Section 3 1987 National Monuments Act) and Detection Device Consent (Section 2 1987 National Monuments Act) will be required for the dive/wade surveys and metal detection, respectively. Licences should be applied for to the National Monuments Service and should be accompanied by a detailed Method Statement. Note a period of 3-4 weeks should be allowed to facilitate processing and approval of the Licence Application and Method Statement.

Nature Conservation

The following observations are not exhaustive and are intended to assist in relation to identifying potential impacts on European and national nature conservation sites, biodiversity and environmental protection in general, in the context of the current proposal. Data collected and surveys carried out in connection with this proposed development may raise other issues that have not been considered here.

As an initial response to your consultation, you are advised to consult the 'Planning' section of the National Parks and Wildlife Service (NPWS) website⁴ as this contains text/advice on consulting the Department in relation to 'development applications', data and information sources, and the basic elements of environmental assessments that may be required. Site specific observations are outlined alongside general guidance on the Environmental Impact Assessment Report (EIAR) and the Natura Impact Statement (NIS).

Site-specific considerations

- The southern shores of Lough Ree occur within the known distribution range of the Narrow-leaved Helleborine (*Cephalanthera longifolia*). Found in amongst damp woodland and scrub, *C. longifolia* has a restricted range in Ireland and has experienced a declining population trend. The species is protected under the Flora (Protection) Order (S.I. No. 356/2015) and is classed as Vulnerable on the Red Data List of Vascular Plants (2016). Impacts on this sensitive species can occur as a result of lakeshore tourism and infrastructural developments.

There is a small population known to occur at Yew Point, which was previously highlighted by the Department to Roscommon County Council in a prior planning application for 36 timber cabins and ancillary works (Planning File Reference::

⁴ <https://www.npws.ie/development%20consultations>



23/60204). Further undiscovered remnant populations may also still exist close to the shoreline within the footprint of the proposed redevelopment. The EIAR should give full consideration to the potential presence of this protected species within the scope of botanical surveys and the potential significance of any *in-situ* or *ex-situ* impacts envisaged as a result of the proposed works.

- Potential increased pollution impacts may result on the Lough Ree Special Area of Conservation (SAC) (Site Code: 000440) and Lough Ree Special Protection Area (SPA) (Site Code: 004064) during both the construction and operational phases of the proposed development. The EIAR should take full account of any residual impacts on the Natura 2000 designations from infrastructural works in close proximity to the shoreline. It is also reasonable to consider that there would be an increased human occupancy within the footprint of the site during peak visitor periods as a consequence of an increase in capacity from the Hodson Bay redevelopment, with the potential for increasing pressures on water quality and habitat integrity.
- Disturbance impacts may also be anticipated to result on qualifying species within the Lough Ree Natura 2000 designations due to an expected increase in visitor numbers, particularly from shoreline access along the proposed promenade and an increase in water-based activities. It is important to ensure that an increase in human activity in the area would not have significant negative impacts for Otter and Special Conservation Interest (SCI) waterbirds. Ornithological surveys should fully consider all of the SCI species of the Lough Ree SPA. Localised disturbance impacts on wintering and breeding birds could be anticipated to occur during the construction phase of works, and operational impacts could be expected to intensify within the proximity of the site. A detailed impact assessment on the wintering and breeding bird assemblages utilising the surrounds near Hodson Bay should therefore form part of the EIAR, paying particular attention to those Annex I species that could potentially be susceptible to disturbance pressures during key nesting or roosting periods along the shoreline and on nearby islands.

Further details on general ecological requirements for Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) are set out in guidance below.

EIAR - Project planning and design

It should be remembered that a key element of EIA is the avoidance or reduction of negative effects on the environment. EIA is an iterative process and the information gathered through assessments or surveys should be used to guide the planning and design of the redevelopment so that sensitive ecological or hydrological areas are avoided, and negative impacts are minimised insofar as is possible. The size, layout and design of the proposed works should be informed by a constraints-type study and the compilation of an environmental constraints map that identifies and avoids, insofar as is possible and using appropriate separation distances, all nature conservation sites and other sensitive ecological and hydrological features.



Complete project details including Construction Environmental Management Plans (CEMPs) need to be provided in order to allow an adequate Environmental Impact Assessment and Appropriate Assessment to be undertaken. Applicants need to be able to demonstrate that CEMPs and other such plans are adequate and effective mitigation supported by scientific information and analysis and that they are feasible within the physical constraints of the site. The positions, locations and sizes of construction infrastructure and mitigation such as settlement ponds, disposal sites and construction compounds may significantly affect European and other designated Sites, habitats and species in their own right and could have an effect for example on drainage, water quality, habitat loss, and disturbance. If these are undetermined at time of the assessment all potential effects of the development on the site are not being considered. It is important to note that the Department has no post consent role. However, Regional Staff are available for liaison regarding any associated licencing requirements.

National policy and biodiversity protection

Biodiversity loss and climate change are intrinsically linked and the government declared a national climate and biodiversity emergency in 2019. Ireland's vision for biodiversity, as outlined in the 4th National Biodiversity Action Plan⁵ (2023-2030), is to ensure "Biodiversity in Ireland is valued, conserved, restored and sustainably used...". "Protect, restore and enhance biodiversity to increase resilience of natural and human systems to climate change" is also an Objective of the Biodiversity Climate Change Sectoral Adaptation Plan⁶. Accordingly, the EIAR should outline how this project will avoid a net loss of biodiversity and include relevant mitigation and/or compensatory measures where necessary.

Regional Spatial Economic Strategy and County Development Plan Policies and Objectives

The Regional Spatial Economic Strategy (RSES) 2020-2032 for the North and Western Region includes a strong Policy Objective to protect nature when developing any infrastructure on inland waterways:

RPO 5.5

Ensure efficient and sustainable use of all our natural resources, including inland waterways, peatlands, and forests in a manner which ensures a healthy society a clean environment and there is no net contribution to biodiversity loss arising from development supported in this strategy. Conserve and protect designated areas and natural heritage areas. Conserve and protect European sites and their integrity.

Biodiversity protection is also identified in a number of key Policies and Objectives of the Roscommon County Development Plan 2022-28:

⁵ National Parks and Wildlife Service, Ireland's 4th National Biodiversity Action Plan 2023-2030.
<https://assets.gov.ie/293802/02ba17a9-fef0-45f2-b0f1-b3ed19ddf358.pdf>

⁶ Department of Culture, Heritage and the Gaeltacht, Biodiversity Climate Change Sectoral Adaptation Plan, 2019.
<https://www.npws.ie/sites/default/files/publications/pdf/Biodiversity-Climate-Change-Sectoral-Adaptation-Plan.pdf>



NH 10.1

Ensure the protection, conservation and enhancement of the biodiversity of the county.

NH 10.2

Support the implementation of the relevant recommendations contained in the National Biodiversity Action Plan, including no net loss in biodiversity, and the All-Ireland Pollinator Plan.

EIAR - Impact Assessment

The impact of the proposed development on the flora/fauna and habitats present should be assessed with particular regard to: Natura 2000 Sites, i.e. Special Areas of Conservation (SACs) designated under the EC Habitats Directive (Council Directive 92/43/EEC) and Special Protection Areas (SPAs) designated under the EC Birds Directive (Directive 2009/147 EC); other designated sites, or sites proposed for designation, such as Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs); Nature Reserves and Refuges for Fauna or Flora designated under the Wildlife Act (as amended); species protected under the Wildlife Acts including protected flora; 'Protected species and natural habitats' as defined in the Environmental Liability Directive (2004/35/EC) and European Communities (Environmental Liability) Regulations, 2008 including Birds Directive Annex I species and other regularly occurring migratory species and their habitats (wherever they occur) and Habitats Directive Annex I habitats, Annex II species and their habitats and Annex IV species and their breeding sites and resting places (wherever they occur); important bird areas (IBAs) such as those identified by Birdlife International; features of the landscape which are of major importance for wild flora and fauna, such as those with a "stepping stone" and ecological corridors function, as referenced in Article 10 of the Habitats Directive; other habitats of ecological value in a national to local context (such as those identified as locally important biodiversity areas within Local Biodiversity Action Plans and County Development Plans); Red data book species; and biodiversity in general.

The Roscommon County Development Plan 2022-28 includes the following Objective:

NH 10.8

Ensure that no plans, programmes, etc. or projects are permitted that give rise to significant cumulative, direct, indirect or secondary impacts on the integrity of European Sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects, (either individually or in combination with other plans, programmes, etc. or projects).

EIAR - Watercourses and Wetlands

Wetlands are important areas for biodiversity and ground and surface water quality should be protected during construction and operation of the proposed development. Any watercourse or wetland impacted on should be surveyed for the presence of protected species under the Wildlife Act (as amended) and species listed on Annexes II and IV of the



Habitats Directive (Council Directive 92/43/EEC) or Annex I of the Birds Directive (Council Directive 79/409 EEC). The following list is not exhaustive, but provides a guide for the consideration of the potential impacts resulting on protected aquatic fauna;

- Otter (*Lutra lutra*) is protected under the Wildlife Acts and listed on Annexes II and IV of the Habitats Directive;
- Salmon (*Salmo salar*) and Lamprey species listed on Annex II of the Habitats Directive;
- Freshwater Pearl Mussels (*Margaritifera* species) and White-clawed Crayfish (*Austropotamobius pallipes*) are protected under the Wildlife Acts and listed on Annex II of the Habitats Directive;
- Frogs (*Rana temporaria*) and Smooth Newts (*Trituris vulgaris*) are protected under the Wildlife Acts;
- Kingfisher (*Alcedo atthis*) is protected under the Wildlife Acts and listed on Annex I of the Birds Directive.

One of the main threats identified in the Threat Response Plan for Otter is habitat destruction⁷. A 10m riparian buffer on both banks of a waterway is considered to comprise part of the Otter habitat. Therefore any proposed development should be located at least 10m away from a waterway.

Flood plains should be identified in the EIAR and left undeveloped to allow for the protection of these valuable habitats and provide areas for flood water retention (green infrastructure). If applicable, the EIAR should take account of the guidelines for Planning Authorities entitled "The Planning System and Flood Risk Management", published by the Department of the Environment, Heritage and Local Government In November 2009⁸.

Wetland protection is also identified in the Roscommon County Development Plan 2022-28:

NH 10.20

Protect waterbodies and watercourses from inappropriate development, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains. To this effect, consideration should be given to Inland Fisheries Ireland's guidance document "*Planning for Watercourses in the Urban Environment*" (2020)⁹.

⁷ https://www.npws.ie/sites/default/files/publications/pdf/2009_Otter_TRP.pdf

⁸ <https://www.gov.ie/en/department-of-housing-local-government-and-heritage/publications/the-planning-system-and-flood-risk-management-guidelines-for-planning-authorities-nov-09/>

⁹ <https://www.fisheriesireland.ie/sites/default/files/migrated/docman/IFIUrbanWatercoursesPlanningGuide.pdf>



EIAR - Ornithology

Survey methodologies should follow best practice and be modified to reflect the Irish situation. Data collection must be sufficient to support conclusions and this may require substantially more survey work over longer periods of time. When survey results are being presented in an EIAR it is important that best practice is followed and that the full survey methodology as well as raw data, including dates and times are detailed. Results for species surveys need to be referenced back to the overall Local, Regional, National and European populations and their dynamics as, in some cases even a small risk to a population of a species could be considered significant. It is important that the National relevance of Lough Ree both as a key breeding site for wetland birds and as a staging point along seasonal bird migration routes is considered as well as for small-scale routes of birds travelling on a daily basis between roosting and feeding areas.

EIAR - Bats

Bat roosts may be present in trees, buildings and bridges where relevant. Bats are subject to a regime of strict protection under the Wildlife Acts and pursuant to the requirements of the Habitats Directive (92/43/EEC) as transposed into Irish Law in Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended). Therefore, damage/disturbance to any such roosts must be avoided in the first instance. While the Minister may grant a derogation licence under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011-2015, a licence can only be granted once a number of strict criteria have been met (see Regulation 54). Bat roosts can only be destroyed under licence under the Wildlife Acts and derogation under the Birds and Natural Habitats Regulations and such a licence would only be given if suitable mitigation measures were implemented. Any proposed migratory bat-friendly lighting should be proven to be effective.

EIAR - Hedgerows, Scrub and related habitats

Hedgerows and scrub should be maintained where possible, as they form wildlife corridors and provide areas for birds to nest in; hedgerows provide a habitat for woodland flora, roosting places for bats and Badger setts may also be present. The EIAR should provide an estimate of the length/area of any hedgerow/scrub that will be removed. Where it is proposed that trees or hedgerows will be removed there should be suitable planting of native species in mitigation incorporated into the EIAR. Hedgerows, trees, scrub and uncultivated vegetation (including peatland habitats) should not be removed during the nesting season (i.e. March 1st to August 31st), noting the protection afforded under the Wildlife Act 1976-2023.

EIAR - Alien Invasive Species

The EIAR should also address the issue of Invasive Alien plant and animal species such as Japanese Knotweed, and detail the methods required to ensure that they are not accidentally introduced or spread during survey and/or construction. Information on Alien Invasive Species in Ireland can be found at <http://invasives.biodiversityireland.ie/> and at <http://invasivespeciesireland.com/>.



EIAR – Lighting

Scientific evidence indicates that artificial light at night, and particularly the glaring bright and blue spectrums of LED lights, has serious negative effects on wildlife and humans. Poorly designed overly bright and inappropriate lighting is all a threat to ecosystem services. A Lighting Plan for the project should be proposed which incorporates EUROBATS 8, Guidelines for Consideration of Bats in Lighting Projects¹⁰. The Dark Sky Ireland recommendations¹¹ can be used for guidance. The impacts of light glare over water on roosting birds should also be considered.

EIAR - Construction Environmental Management Plans

Construction Environmental Management Plans (CEMPs) should contain sufficient detail to avoid any post construction doubt with regard to the implementation of mitigation measures, timings and roles and responsibilities for same. There can be no doubts or lacunae regarding what is required for mitigation, pre-commencement surveys and/or licencing requirements.

Construction work should not be allowed to impact on water quality and measures should be detailed in the EIAR to prevent sediment and/or fuel runoff from getting into watercourses which could adversely impact on aquatic species. Please see above information in relation to Flood Plains for details with regard to flooding risk.

Inland Fisheries Ireland (IFI) should be consulted with regard to impacts on fish species and the applicant may find it useful to consult their publication entitled "Planning for watercourses in the urban environment" which can be downloaded from their website¹².

Guidance on Appropriate Assessment (AA)

In order to carry out the Appropriate Assessment Screening and prepare a Natura Impact Statement (NIS), information about the relevant European Sites including their Conservation Objectives will need to be collected. Screening for Appropriate Assessment should focus on the likely significant effects of the proposed development and related activities on European Sites noting that impacts to sites via air and water may occur over large distances using the source-pathway-receptor model. Details of designated sites and species and Conservation Objectives can be found on <http://www.npws.ie/>.

Site-Specific Conservation Objectives (SSCOs) are now available for all SACs. Each Conservation Objective for a Qualifying Interest (QI) habitat or species is defined by a list of

¹⁰ EUROBATS 8 Guidelines for consideration of bats in lighting projects

https://www.eurobats.org/sites/default/files/documents/publications/publication_series/WEB_EUROBATS_08_ENGL_NVK_19092018.pdf

¹¹ Dark Sky Ireland Guidelines - Our vision and policy on reducing light pollution in Ireland

https://www.darksky.ie/wp-content/uploads/2020/04/BestPracticesInPublicLighting_BEspey2020.pdf

¹²

<https://www.fisheriesireland.ie/sites/default/files/migrated/docman/IFIUrbanWatercoursesPlanningGuide.pdf>



attributes and targets and is often supported by further documentation. It is advised, as per the notes and guidelines in the Site-Specific Conservation Objectives that any reports quoting Conservation Objectives should give the version number and date, so that it can be ensured and established that the most up-to-date versions including map boundaries are used in the preparation of Natura Impact Statements and in undertaking Appropriate Assessments.

The Departmental guidance document on Appropriate Assessment is available on the NPWS website at <https://www.npws.ie/development-consultations> and in the EU Commission guidance entitled "*Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*"¹³. CJEU and Irish Case Law has clarified some issues and should also be consulted¹⁴.

The NIS should present a robust and reasoned scientific assessment and analysis of the implications of the proposals for the relevant Conservation Objectives of relevant European Sites. Best scientific knowledge in the field should be applied to the understanding of the likely effects, and to the assessment and analysis of the implications of the proposals for the Conservation Objectives and integrity of the Sites. When carried out by the competent authority, the Appropriate Assessment cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the project on European Sites.

Cumulative and ex situ impacts

A rule of thumb often used is to include all European Sites within a distance of 15km. It should be noted however that this will not always be appropriate. In some instances where there are hydrological connections a whole river catchment or a groundwater aquifer may need to be included. Similarly where bird flight paths are involved the impact may be on an SPA more than 15 kilometres away. Other relevant Local Authorities should be consulted to determine if there are any projects or plans which, in combination with this proposed development, could impact on any European Sites.

Licences

Where there are impacts on protected species and their habitats, resting or breeding places, licences may be required under the Wildlife Act 1976-2023 or derogations under the EC (Birds and Natural Habitats) Regulations 2011, as amended. In particular, Bats as outlined earlier and Otters, are subject to a regime of strict protection pursuant to the requirements of the Habitats Directive (92/43/EEC) as transposed into Irish law in Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended).

¹³ <https://op.europa.eu/en/publication-detail/-/publication/2b6c4b16-e867-42da-b604-f67ee6fe60c3>

¹⁴ Case 521/12 T.C. Briels v. Minister van Infrastructuur en Milieu EU:C:2014:330



The Planning Authority will be required to take account of species protected under Sections 21, 22 and 23 of the Wildlife Acts if there are any impacts on other protected species or their resting or breeding places, such as on protected plants, Badger setts or Birds' nests. For that reason vegetation, including hedges and trees, should not be removed during the nesting season (i.e. March 1st to August 31st). They will also need to be cognisant of Article 5 (d) of the Birds Directive.

In order to apply for any such licences or derogations as mentioned above the results of a survey should be submitted to the National Parks and Wildlife Service of this Department. Such surveys are to be carried out by appropriately qualified person/s at an appropriate time of the year. Details of survey methodology should also be provided. Should this survey work take place well before construction commences, it is recommended that an additional ecological survey of the development site should take place immediately prior to construction to ensure that no significant change in the findings of the baseline ecological survey has occurred. If there has been any significant change mitigation may require amendment and where a licence has expired, there will be a need for new licence applications for protected species.

The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the Planning Authority, in his role as statutory consultee under the Planning and Development Act, 2000, as amended.

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

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

Is mise, le meas

A handwritten signature in blue ink, which appears to read 'Sinéad O'Brien'. The signature is written in a cursive, flowing style.

Sinéad O' Brien
Development Applications Unit
Administration

Michael Lough

From: DIG <Dig@gasnetworks.ie>
Sent: Monday 30 June 2025 13:12
To: Killian McGovern
Subject: RE: 241220 - Scoping Letter - Hodson Bay Waterfront Park and Marina Redevelopment

You don't often get email from dig@gasnetworks.ie. [Learn why this is important](#)

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Thank you for your enquiry to the Gas Networks Ireland **Dial Before You Dig** service.

Gas Networks Ireland has **No recorded Gas Network** within your area of interest.

Before you start work, you must have a current gas network map (or maps) for the work location. A current gas network map (or maps) must always be kept on site while work is under way.

The Gas Network

For an overview of the existing Gas Network, please refer to the Gas Networks Ireland safety booklet, **Safety advice for working in the vicinity of natural gas pipelines**, available at <https://www.gasnetworks.ie/home/safety/dial-before-you-dig/>

Reading your Map

- High pressure transmission gas pipe is shown **Red**.
- Medium pressure distribution gas pipe is shown **Blue**.
- Low Pressure distribution gas pipe is shown **Green**.

The gas network map is indicative only. You must conform to the safety and legal notices printed on the map. For further information on reading this map refer to the **Safety Information** below.

Breaking Ground

- Supervision by Gas Networks Ireland is **not** required when working in the vicinity of Distribution gas pipes (unless noted otherwise). Safe digging practices **must** be followed. All work in the vicinity of a gas transmission pipeline **must** be carried out in compliance with:
 - Health and Safety Authority, **Code of Practice for Avoiding Danger from Underground Services**.

Critical Activity

Quarrying or blasting must not be carried out within 400 m of the gas network until Gas Networks Ireland has been consulted on **1800 42 77 47**

Aurora Telecom

- Part of the Aurora Telecom Network may be present on your network map. For further information, Aurora can be contacted on **01 892 6166** (Office Hours) or auroralink@gasnetworks.ie.

Safety Information

- Before starting work any work in the vicinity of the gas network, please refer to the Gas Networks Ireland safety booklet, ***Safety advice for working in the vicinity of natural gas pipelines***, available at <https://www.gasnetworks.ie/home/safety/dial-before-you-dig/>

This booklet contains important safety information, including advice on how to read the gas network maps you have requested.

If you did not request this map, please contact Customer Service on **1800 200 694**.

Thank you for your enquiry to Gas Networks Ireland.

T 1800 20 50 50 (Emergency)

T 1800 42 77 47 (Dial Before You Dig enquiries)

E dig@gasnetworks.ie

Gas Networks Ireland Networks Services Centre, St. Margaret's Road, Finglas, D11 Y895
gasnetworks.ie | Find us on [Twitter](#)



Useful Publications

- Health and Safety Authority, ***Code of Practice for Avoiding Danger from Underground Services***
- Health and Safety Authority, ***Guide to Safety in Excavations***

Both are available free of charge from: Health and Safety Authority on **0818 289 389** www.hsa.ie

From: kmcgovern@mkoireland.ie

Sent: Friday, June 27, 2025 2:18 PM

To: networksinfo@gasnetworks.ie

Cc: fleannon@mkoireland.ie

Subject: 241220 - Scoping Letter - Hodson Bay Waterfront Park and Marina Redevelopment

Dear Sir or Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed redevelopment of the Hodson Bay waterfront park and marina located in Barrymore, Co. Roscommon. The applicant for the proposed development is Roscommon County Council in conjunction with Waterways Ireland.

The proposals will include for the construction of a new Water Sports Pavillion as well as a continuous promenade along the lakeshore and landscaped Marina Plaza Space. The proposals also include the redevelopment of the existing Waterways Ireland marina at Hodson Bay. It is proposed that the visitor experience at Hodson Bay will be enhanced through the proposed development which will focus on the improvement and redevelopment of the shoreline and providing public access to the River Shannon, creating a pedestrian priority environment.

The details of the proposed development are outlined in the attached Scoping Document and Cover Letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind regards,

Killian.

Killian McGovern BSc. (Env)

Environmental Scientist



Offices in Galway and Dublin

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Tá an fhaisnéis á seachadadh dírithe ar an duine nó ar an eintiteas chuig a bhfuil sí seolta amháin agus féadfar ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh tráchtála de a bheith mar chuid de. Tá aon athsheachadadh nó scaipeadh den fhaisnéis, aon athbhreithniú ar nó aon úsáid eile a bhaint as, nó aon ghníomh a dhéantar ag brath ar an bhfaisnéis seo ag daoine nó ag eintitis nach dóibh siúd an fhaisnéis seo, toirimiscthe agus féadfar é a bheith neamhdhleathach. Níl Líonraí Gáis Éireann faoi dhliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Ní ghlacann Líonraí Gáis Éireann le haon dliteanas faoi ghníomh nó faoi iarmhairtí bunaithe ar úsáid thoirmiscthe na faisnéise seo. Níl Líonraí Gáis Éireann faoi dhliteanas maidir le seachadadh ceart agus iomlán na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Má fuair tú an teachtaireacht seo in earráid, más é do thoil é, déan teagmháil leis an seoltóir agus scríos an t-ábhar ó gach aon ríomhaire.

Féadfar ríomhphost a bheith soghabhálach i leith truailithe, idircheaptha agus i leith leasaithe neamhúdaraith. Ní ghlacann Líonraí Gáis Éireann le haon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo i ndiaidh é a sheoladh nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin. Más é do thoil é, tabhair faoi deara chomh maith go bhféadfar monatóireacht a dhéanamh ar theachtaireachtaí chuig nó ó Líonraí Gáis Éireann chun comhlíonadh le polasaithe agus le caighdeáin Líonraí Gáis Éireann a chinntiú agus chun ár ngnó a chosaint. Líonraí Gáis Éireann cuideachta ghníomhaíochta ainmnithe, faoi theorainn scaireanna, atá corpraithe in Éirinn leis an uimhir chláráithe 555744 agus a tá hoifig chláráithe ag Bóthar na nOibreacha Gáis, Corcaigh, T12 RX96.

Go raibh maith agat as d'aird a thabhairt.

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be monitored to ensure compliance with Gas Networks Ireland's policies and standards and to protect our business. Gas Networks Ireland a designated activity company, limited by shares, incorporated in Ireland with registered number 555744 and having its registered office at Gasworks Road, Cork, T12 RX96.

Thank you for your attention.

For the attention of Killian McGovern
MKO
Tuam Road,
Galway,
H91 VW84

05th August 2025

By Email: kmcgovern@mkoireland.ie

Uisce Éireann
Bosca OP 6000
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D01 WA07
Éire

Uisce Éireann
PO Box 6000
Dublin 1
D01 WA07
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Re: EIA Scoping Request – Proposed Hodson Bay Waterfront
Park and Marina Redevelopment, Co. Roscommon

Dear Killian McGovern

Uisce Éireann has received notification of your Environmental Impact Assessment (EIA) scoping request relating Roscommon County Councils forthcoming application to redevelop the Hodson Bay waterfront and marina at Barrymore Co. Roscommon

Please see attached, Uisce Éireann's scoping opinion in relation to your proposals and Uisce Éireann's public infrastructure & assets.

On receipt of the planning referral, Uisce Éireann will review the finalised Environmental Impact Assessment Report (EIAR) as part of our planning assessment. Uisce Éireann's will then issue a statutory response to the Planning Authority in line with our obligations as a statutory consultee.

Uisce Éireann's Response to EIAR Scoping Request

The proposed development directly interacts with Lough Ree, the second of three lakes on the River Shannon. This is a waterbody from which Uisce Éireann operates numerous downstream abstractions point that serves much of the country, and as such these proposals cannot give rise to any deterioration of Lough Ree or River Shannon water sources. Care must be taken to avoid adverse impacts to this body of water and its catchment in the construction and operational phases of this proposal, and mitigations proposed for any potential impacts.

Uisce Éireann operates several assets within and around the project area of this proposal. A 150mm UPVC watermain runs parallel to the L2020 road, which feeds a number of subsidiary pipes throughout the redevelopment area. Furthermore a wastewater pump station serving the area is in operation north of Cushlea Estate. Uisce Eireann cannot accept any unscheduled disruption to its network infrastructure. Where such an impact cannot be avoided or mitigated , it will be necessary to enter into a diversions agreement with Uisce Éireann, prior to the commencement of works.

In addition to the specific items outlined above please note the following aspects of Water Services which should be considered in the scope of your EIAR;

- a) Where the development proposal has the potential to impact an Uisce Éireann Drinking Water Source(s), the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to Uisce Éireann's Drinking Water Source(s) during the construction and operational phases of the development. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified as part of the report.
- b) Where the development proposes the backfilling of materials, the applicant is required to include a waste sampling strategy to ensure the material is inert.
- c) Mitigations should be proposed for any potential negative impacts on any water source(s) which may be in proximity and included in the environmental management plan and incident response.
- d) Any and all potential impacts on the nearby reservoir as public water supply water source(s) are assessed, including any impact on hydrogeology and any groundwater/ surface water interactions.
- e) Impacts of the development on the capacity of water services (*i.e. do existing water services have the capacity to cater for the new development*). This is confirmed by Uisce Éireann in the form of a Confirmation of Feasibility (COF). If a development requires a connection to either a public water supply or sewage collection system, the developer is advised to submit a Pre-Connection Enquiry (PCE) enquiry to Uisce Éireann to determine the feasibility of connection to the Uisce Éireann network.
- f) The applicant shall identify any upgrading of water services infrastructure that would be required to accommodate the proposed development.

- g) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an Uisce Éireann collection network.
- h) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks and potential measures to minimise and or / stop surface waters from combined sewers.
- i) Any physical impact on Uisce Éireann assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.
- j) When considering a development proposal, the applicant is advised to determine the location of public water services assets, possible connection points from the applicant's site / lands to the public network and any drinking water abstraction catchments to ensure these are included and fully assessed in any pre-planning proposals. Details, where known, can be obtained by emailing an Ordnance Survey map identifying the proposed location of the applicant's intended development to datarequests@water.ie
- k) Other indicators or methodologies for identifying infrastructure located within the applicant's lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- l) Any potential impacts on the assimilative capacity of receiving waters in relation to Uisce Éireann discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report.
- m) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (*and resultant potential impact on the capacity of the source*) or the potential of the development to influence / present a risk to the quality of the water abstracted by Uisce Éireann for public supply should be identified within the report.
- n) Where a development proposes to connect to an Uisce Éireann network and that network either abstracts water from or discharges wastewater to a “protected”/ sensitive area, consideration as to whether the integrity of the site / conservation

objectives of the site would be compromised should be identified within the report.

- o) Uisce Éireann does not permit building over of its assets. As an applicant you are required to;
- survey the site to determine the exact location of the assets. Any trial investigations should be carried out with the agreement and in the presence of Uisce Éireann.
 - Provide evidence of separation distances between the existing Uisce Éireann assets and proposed structures, other services, trees, etc. have to be in accordance with the Irish Water Codes of Practice and Standard Details.
- p) Where a diversion of Public Infrastructure may be required subject to layout proposal of the development and separation distances, the applicant is required to submit a Diversions Enquiry to diversions@water.ie
- q) Mitigation measures in relation to any of the above ensuring a zero risk to any Uisce Éireann drinking water sources (Surface and Ground water).

This is not an exhaustive list.

Please note;

- Where connection(s) to the public network is required as part of the development proposal, applicants are advised to complete the Pre-Connection Enquiry process and have received a Confirmation of Feasibility letter from Uisce Éireann ahead of any planning application.
- Uisce Éireann will not accept new surface water discharges to combined sewer networks.
- Where a new connection(s) is sought, the applicant or developer shall enter into water and/or wastewater connection agreement(s) with Uisce Éireann prior to the commencement of this development.
- Where an existing connection is on place, the applicant or developer may be required to enter into a new or revised water and/or wastewater connection agreement(s) with Uisce Éireann prior to the commencement of this development.

Queries relating to this EIAR scoping request should be directed to planning@water.ie

PP. Ali Robinson

Signed on behalf of Dermot Phelan

Connections Delivery Manager

Michael Lough

From: INFO <Information@tii.ie>
Sent: Monday 21 July 2025 09:09
To: Killian McGovern
Subject: TII25-132077 - Scoping Letter - Hodson Bay Waterfront Park and Marina Redevelopment Roscommon

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Dear Mr. McGovern,

Thank you for your correspondence of 27 June 2025 regarding the above. Transport Infrastructure Ireland's (TII's) position in relation to your enquiry is as follows.

TII will endeavour to consider and respond to planning applications referred to it, given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines, as outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Regard should also be had to other relevant guidance available at www.TII.ie.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals, following the examination of any valid planning application referred.

With respect to EIAR Scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the national road network.

The developer should have regard, inter alia, to the following:

- Consultations should be had with the relevant Local Authority/National Roads Design Office, with regard to the locations of existing and future national road schemes in the vicinity of the site.
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development.

Having regard to the above point, TII notes the site extents detailed in the EIAR Scoping Report extend to include the L2020 local road including the local road junction with the N61, national road. Where any alterations are proposed to the N61 and/or the N61/L2020 junction, consultation should be undertaken with TII, and the Council will be aware that a Design Report may be required in accordance with TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes). All works impacting national roads shall adhere to TII Publications design standards and procedures.

- The developer should assess visual impacts from existing national roads.

- The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Coimisiún Pleanála regarding road schemes in the area. The developer should, in particular, have regard to any potential cumulative impacts.
- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works).
- The EIAR should have regard to TII's Environmental Assessment and Construction Guidelines, including the Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (National Road Authority (NRA), 2014).
- The EIAR should consider the 'European Communities (Environmental Noise) Regulations, 2018, (S.I. no. 549 of 2018)', and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see 'Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (NRA, 2014)').
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the national road network and junctions of lower category roads with national roads.

In relation to national roads, TII's 'Traffic and Transport Assessment Guidelines' (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of TII's TTA Guidelines, which addresses requirements for sub-threshold TTA.

The TTA should consider the cumulative impact of development in the area as well and any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed, as TII will not be responsible for such costs.

- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- TII recommends that the applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are a feature of the development, e.g., turbine or substation components, separate structure approvals/permits and other licences may be required in connection with the proposed haul route. All national road structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed.

Notwithstanding any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practice.

I hope that this information is of assistance to you.

Yours sincerely,

Suzanne Cahill

Senior Regulatory & Administration Executive

From: Killian McGovern
Sent: Friday 27 June 2025 14:47
To: Landuse Planning
Cc: Feargal Lennon
Subject: 241220 - Scoping Letter - Hodson Bay Waterfront Park and Marina Redevelopment

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Dear Mr. Mills,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed redevelopment of the Hodson Bay waterfront park and marina located in Barrymore, Co. Roscommon. The applicant for the proposed development is Roscommon County Council in conjunction with Waterways Ireland.

The proposals will include for the construction of a new Water Sports Pavillion as well as a continuous promenade along the lakeshore and landscaped Marina Plaza Space. The proposals also include the redevelopment of the existing Waterways Ireland marina at Hodson Bay. It is proposed that the visitor experience at Hodson Bay will be enhanced through the proposed development which will focus on the improvement and redevelopment of the shoreline and providing public access to the River Shannon, creating a pedestrian priority environment.

The details of the proposed development are outlined in the attached Scoping Document and Cover Letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind regards,
Killian.

Killian McGovern BSc. (Env)
Environmental Scientist

MKO
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611



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Michael Lough

From: Melanie McQuade <melanie.mcquade@westmeathcoco.ie>
Sent: Friday 27 June 2025 15:32
To: Killian McGovern
Subject: RE: Proofpoint Essentials - Filter Notification

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Received with thanks.
Melanie

From: Killian McGovern <kmcgovern@mkoireland.ie>
Sent: Friday 27 June 2025 14:59
To: Melanie McQuade <melanie.mcquade@westmeathcoco.ie>
Subject: RE: Proofpoint Essentials - Filter Notification

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Hi Melanie,

Apologies.

I might try and send the cover letter and the scoping document in separate emails and see if that works.

Kind regards,
Killian.

Killian McGovern BSc. (Env)
Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611



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From: Melanie McQuade <melanie.mcquade@westmeathcoco.ie>

Sent: 27 June 2025 14:42

To: Killian McGovern <kmcgovern@mkoireland.ie>

Subject: FW: Proofpoint Essentials - Filter Notification

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Melanie

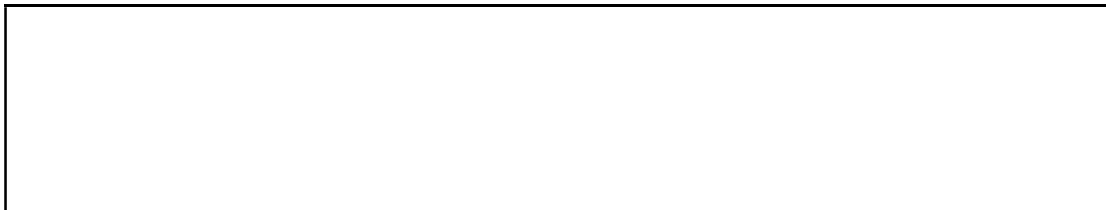
From: Proofpoint Essentials <do-not-reply@proofpointessentials.com>

Sent: Friday 27 June 2025 14:21

To: Heritage <heritage@westmeathcoco.ie>

Subject: Proofpoint Essentials - Filter Notification

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Mura tusa an faighteoir beartaithe, cuir in iúl don seoltóir láithreach trí fhreagra a thabhairt don ríomhphost seo, agus ansin scrios an ríomhphost gan é a chur ar aghaidh, a phriontáil, a chóipeáil, a roinnt nó a úsáid in aon bhealach. Ba cheart sonraí pearsanta in aon fhoráid a phróiseáil de réir na Rialachán Ginearálta maidir le Cosaint Sonraí.

B'fhéidir nach gá gurb iad na tuairimí a chuirtear in iúl sa ríomhphost seo na tuairimí atá ag Comhairle Contae na hIarmhí.

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Ba chóir go mbeadh a fhios ag seoltóirí agus faighteoirí ríomhphoist go bhféadfadh sé go gcaithfí ábhar ríomhphoist a nochtadh mar fhreagairt ar iarratas mar gheall ar reachtaíocht um Chosaint Sonraí agus um Shaoráil Faisnéise na hÉireann, mar sin ba chóir a bheith cúramach maidir le hábhar.”

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thoil go ndéantar gach teachtaireacht a scanadh, mar ní ghlacann an Chomhairle le haon dliteanas as éilliú nó damáiste do do chórais.

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Michael Lough

From: Arlene Ward <arlene.ward@hse.ie>
Sent: Tuesday 12 August 2025 11:56
To: Killian McGovern
Subject: RE: EIA Scoping Application for the Proposed Hodson Bay Waterfront Park and Marina Redevelopment, Co. Roscommon
Attachments: NEHS_5060_Cover letter.pdf; NEHS_5060.pdf

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Dear Sir or Madam,

RE: EIA Scoping Application for the Proposed Hodson Bay Waterfront Park and Marina Redevelopment, Co. Roscommon

Please find attached response for the above said proposed application from the NEHS.
If you require any further information please do not hesitate to contact the National Environmental Health Service.

Kindest Regards

Arlene Ward
Sláinte Chomhshaoil | FSS Seirbhís Náisiúnta Sláinte Comhshaoil
Environmental Health Officer | HSE National Environmental Health Service

FSS Seirbhís Náisiúnta Sláinte Comhshaoil, Halla Ashbourne, Páirc Gnó Ashbourne, Bóthar an Duga, Luimneach V94 NPEO
HSE National Environmental Health Service, Ashbourne Hall , Ashbourne Business Park , Dock Road, Limerick V94 NPEO

061 461502 | 087 388 2910 | arlene.ward@hse.ie



From: Killian McGovern <kmcgovern@mkoireland.ie>
Sent: Friday 27 June 2025 14:18
To: Environmental Health <environmental.health@hse.ie>
Cc: Feargal Lennon <flennon@mkoireland.ie>
Subject: 241220 - Scoping Letter - Hodson Bay Waterfront Park and Marina Redevelopment

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Dear Sir or Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for the proposed redevelopment of the Hodson Bay waterfront park and marina located in Barrymore, Co. Roscommon. The applicant for the proposed development is Roscommon County Council in conjunction with Waterways Ireland.

The proposals will include for the construction of a new Water Sports Pavillion as well as a continuous promenade along the lakeshore and landscaped Marina Plaza Space. The proposals also include the redevelopment of the existing Waterways Ireland marina at Hodson Bay. It is proposed that the visitor experience at Hodson Bay will be enhanced through the proposed development which will focus on the improvement and redevelopment of the shoreline and providing public access to the River Shannon, creating a pedestrian priority environment.

The details of the proposed development are outlined in the attached Scoping Document and Cover Letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind regards,
Killian.

Killian McGovern BSc. (Env)
Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

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National Environmental Health Service
Health Service Executive
Government Offices
Convent Road
Roscommon
Phone: 090 6637890
E-Mail: john.hanily@hse.ie

11th August 2025

Ref ID 5060

EIA Scoping Application for the Proposed Hodson Bay Waterfront Park and Marina Redevelopment, Co. Roscommon

Dear Sir/Madam,

Please find enclosed the HSE Consultation Report in relation to the above proposal.

The following HSE Departments were made aware of the scoping and invited to input into this response on 2nd July 2025:

- Emergency Planning – Paul Brophy/ Sean Adair
- National Capital Estates Office – Regional AND
- Director of National Health Protection – Eamonn O' Moore/Ina Kelly
- REO West & North West – Tony Canavan

If you have any queries regarding this report please contact Mr. John Hanily, PEHO, Roscommon, (john.hanily@hse.ie) in the first instance

A handwritten signature in blue ink that reads 'John Hanily'.

John Hanily
Principal Environmental Health Officer



National Environmental Health Service
Health Service Executive
Government Offices
Convent Road Roscommon
Phone: 090 6637890
E-Mail: john.hanily@hse.ie

MKO
Tuam Road,
Galway,
H91 VW84

11th August 2025

Ref ID 5060

EIA Scoping Application for the Proposed Hodson Bay Waterfront Park and Marina Redevelopment, Co. Roscommon

The following HSE Departments were made aware of the scoping and invited to input into this response on 2nd July 2025:

- Emergency Planning – Paul Brophy/ Sean Adair
- National Capital Estates Office – Regional AND
- Director of National Health Protection – Eamonn O' Moore/Ina Kelly
- REO West & North West – Tony Canavan

General

The following documents should be considered when preparing the Environmental Impact Assessment Report:

- Guidelines on the information to be contained in EIS (2002), 187kb
- Advice Notes on Current Practice in the preparation of EIS (2003), 435kb
- Guidelines for Planning Authorities and An Bord Pleanala on carrying out Environmental Impact Assessment

https://www.housing.gov.ie/sites/default/files/publications/files/guidelines_for_planning_authorities_and_an_bord_pleanala_on_carrying_out_eia_-_august_2018.pdf

EU publication: Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017

http://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf

Adoption of the Directive (2014/52/EU) in April 2014 initiated a review of the above guidelines. The draft new guidelines can be seen at:

<http://www.epa.ie/pubs/consultation/reviewofdraftteisguidelinesadvicenotes/>

Generally the Environmental Impact Assessment should examine all likely significant impacts and provide the following information for each:

- a) Description of the receiving environment;
- b) The nature and scale of the impact;
- c) An assessment of the significance of the impact;
- d) Proposed mitigation measures;
- e) Residual impacts.

Directive 2014/52/EU has an increased requirement to assess likely significant impacts on Population and Human Health. In the experience of the Environmental Health Service (EHS) impacts on human health are generally inadequately assessed in EIA in Ireland. It is recommended that the wider determinants of health and wellbeing are considered in a proportionate manner when considering the EIA. Guidance on wider determinants of health can be found at www.publichealth.ie

It should be noted that the positive likely significant impacts should be identified and assessed, not just any likely negative significant impacts from the proposed development.

The nature of the proposed development supports a number of key health strategies around physical exercise and health and wellbeing and also the Cross-Governmental Healthy Ireland Strategy. These are relevant factors in assessing the likely significant impact of the development.

<https://www.gov.ie/en/campaigns/healthy-ireland/>

Consideration should also be given to opportunities for connectivity that encourages/promotes walking and cycling to and from the site from existing population centres and from other areas around the proposed development.

The HSE will consider the final EIAR accompanying the planning application and will in particular make comments to the Planning Authority on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact.

Public consultation is an important aspect of EIA and this should be demonstrated in the final EIAR.

The Non-Technical Summary is an important document that should accurately summarise the EIAR in non-technical language. It should identify the methodologies used and the criteria to evaluate the predicted likely significant impacts and clearly state the mitigation proposed and the residual impacts.

Consideration of Alternatives:

There is a statutory requirement that the EIA considers reasonable alternatives and states the rationale for the decisions made.

Public Consultation

Meaningful public consultation with the local community should be carried out. All legitimate concerns from the public shall be fully addressed and evaluated. The EIAR should clearly demonstrate how the outcome of consultation with the public influenced decision making within the EIA.

Noise

The impact of noise from the operational phase of the proposed development shall be assessed. Noise sensitive receptors should be identified.

Appropriate noise assessment modelling should be carried out to accurately predict the change in the noise environment. This information should be outlined and clearly displayed in the EIAR. The significance of the predicted change in the noise environment should be fully assessed and the criteria for the evaluation of the significance clearly identified.

Lighting

The NEHS would recommend that the applicant should have reference to the Institution of Lighting Professionals, Guidance Note 01/21, The Reduction of Obtrusive Light, in the fitting and operation of any external lighting, to ensure amenity is not adversely impacted at neighbouring dwellings by artificial light. This guidance is available at:

<https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/>

Water

All drinking water sources, if any, should be identified. Any potential impacts to these drinking water sources shall be assessed. The EHS would recommend that all information is gathered by means of a site survey as desktop studies do not always accurately reflect the current use of water resources.

Any potential impacts of surface water runoff should be assessed and mitigation measures detailed. Site drainage, increased rainfall and the possibility of flooding should all be considered when identifying possible impacts and mitigation measures.

The drinking water source to the proposed development should be identified.

The waste water disposal method should be identified and, if it is not to mains sewerage system, the impacts should be assessed.

Air

The potential significant impacts of any air emissions should be assessed.

Artificial Lighting

An assessment should be carried out into any likely significant impacts from artificial lighting as a result of operation of the proposed development.

Sustainability

Consideration should be given to:

- a) Energy efficiency in the design of the proposed development and energy management,
- b) Sustainable drainage systems,
- c) Water conservation/reuse measures
- d) Waste reduction

Cumulative Impacts

In line with the EPA Guidelines on the information to be contained in Environmental Impact Statements (2002) and their Advice Notes on Current Practice in the preparation of Environmental Impact Statements (2003) the EIA should include the assessment of cumulative impacts of any other development in the area.

Decommissioning

The EIAR should describe proposals for decommissioning the facility at the end of life of the project. The residual impact of the development on the environment must be fully assessed.

Construction

A construction management plan should be included with the EIAR that identifies the likely impacts from the construction phase and the mitigation required to protect surface and ground water, mitigate emissions into air, including noise and dust, and includes a waste management plan.

Arlene Ward

Arlene Ward
Environmental Health Officer

Roscommon County Council
County Hall
Ardnanagh
Roscommon

14th November 2025

Re: Proposed Development at Hodson's Bay

Dear Sir or Madam

I attended the recent presentation of the above project at the Hodson Bay Hotel and spoke to a number of the technical staff on hand to explain the project.

In my view the whole project is an inappropriate development for the area for the following reasons:

The Shannon is an exceptionally long river and runs through Roscommon from the middle of Lough Allen to the River Suck, places some 92km apart. The length of the actual shoreline in the county is of course much longer than this and might be twice as long. Of all waterside locations within Roscommon's borders, Hodson's Bay is probably the most intensely used. There are currently some 350 car spaces many of which are occupied on a year-round basis. In addition to the thriving business at the hotel, and the busy golf club, there is the very busy if unsightly "Baysports" business, which seems to have grown in a haphazard manner over the last fifteen years so. There are also perhaps fifty private houses accessed off the Roscommon Road, a number soon to be increased, and the Yew Point eco-lodge project, currently under construction.

It seems to me that the entire premise of the project is fundamentally flawed.

There are four elements to the scheme

- 1 Increase the size of the harbour

- 2 Provide better road access for motorists and cyclist and walkers
- 3 Construct a new watersports building in lieu of the current Baysports building and its sprawling group of marquees and compounds. This building would be leased to waterpark operator but would have other functions in the off season, and would also have a pubic café.
- 4 Additional car-parking

1 Harbour

I have no objection in principle to an upgrade of the harbour and I own a cruiser based in a private marina on the Shannon, (which all boat owners are effectively obliged to do). I query whether this particular site should be a priority for Waterways Ireland to upgrade or increase capacity. It could certainly do with a small shower block and or a pump-out station, such as provided at Terryglass or Banagher, but there is no reason that this could not be located at the south end of the existing car park. The location is very exposed in easterly winds, and any safe new harbour will be required to have a new outer wall if the capacity is to be increased, but one wonders why, in an era of declining numbers of cruisers using the navigation (which can be verified by the lock passage records) WI would be keen to increase the capacity rather than the quality of their facilities. One would also ask the council to discuss with Waterways Ireland their reluctance to control or to limit the use of Personal Watercraft (Jetskis) which are habitually used in Hodson's Bay in a manner which often causes nuisance to other members of the public and always to all residents and wildlife. The council is reminded that the permission granted for the watersports centre limited the use of powered craft from that facility to one 10hp boat, which is indicative of Bord Pleanála's assessment of the situation.

2 Watersports Facility

It seems to me that the council has no more idea now than it did twenty years ago, about what is required in this watersports facility. It is telling that it is now seeking to replace the very building that was foisted on the area in face of strong opposition at that time. The new building appears to have been designed with a generic user in mind, but does not realistically address the requirements of such an operator. For example, I was informed at the presentation that the main rooms could be used for community and other recreational use in the off-season, but I imagine the larger indoor spaces would be required for equipment storage and maintenance. It is also extraordinary that the presentation studiously avoids any representation of the inflatable water park, which is the an incredibly large and conspicuous group of objects. My late father was the architect for the holiday houses at Nos 1 – 6 Yew Point in the early 1960s and often recalled how he was required to take planning officers out in a boat to assess mock-ups of the houses and to

demonstrate their invisibility from the lake. That the same planning authority is now encouraging what can only be described as an eyesore to be placed semi-permanently in the bay, is somewhat odd. Clearly the watersports centre is bringing great enjoyment to very many young people and one certainly does not begrudge them that, but one wonders how the business will cope with the ever-worsening water quality which already in Lough Derg is barely safe to swim in. I would ask that any continued operation of the site be conditional on the cessation of the outdoor playing of loud music, which can be heard across the lake, in this Special Area of Conservation where wildlife is supposed to be protected.

3 Car park

It is pretty well established that car traffic (unlike boat traffic) expands to fill the road space and parking space which is provided. For this reason, most planning authorities now seek to limit the number of car spaces attached to a development, not set a minimum. The waterfront is already severely congested at most times and the addition of 50% more car spaces can only be intended to foster and encourage access by car, even if soothingly described as “overflow”. This is, by any reckoning, bonkers, and if the council is determined to seek to increase visitors to the location, as opposed to encouraging them to visit their other 150km + of lake and riverside in the county, then surely a more sustainable approach would be to establish a bus service from Athlone or Roscommon, or even to place the car park on the Roscommon road and operate a free shuttle bus to the harbour area.

4 Road Improvements.

Road designers in Ireland have little to be proud of and seem determined to run motorways or dual carriageways through every village and then, when they succeed in their crazy plans, wonder how to achieve “traffic calming”. The virtually non-existent cycle lane network throughout the country is testament to this. I would welcome the provision of proper cycle lanes and footpaths from the Roscommon road to the hotel, but urge the council to consider shared surfaces as the way forward for the amenity area itself. It is the provision of footpaths which give motorists a sense of entitlement to drive quickly whereas, if the area were more obviously a shared surface, they might drive with more consideration and awareness of the numbers of small children walking around.

Conclusion

I think this whole idea is ill-conceived and inappropriate but I fear the council will push forward on the basis that it thinks it knows best and that it has committed too much to the project to turn back now. I urge the proponents of the scheme to stop and ask themselves how well their last

scheme has aged and whether it reflects well on their ability to plan and manage projects of this nature. I would ask instead that the council set about tidying up the terrible mess that has developed over the last twenty years, for which it is mostly responsible, and then to turn its attention to spreading the tourism spend around the county rather than concentrating it in this already congested area.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Garrett O'Neill', written in a cursive style.

Garrett O'Neill

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