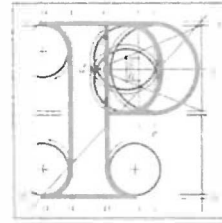


Our Case Number: ACP-324610-26

Your Reference: Athlone Golf Club



An
Coimisiún
Pleanála

Emma Pillion Planning
Fardum,
Athlone,
Co. Westmeath

Date: 07 October 2026

Re: Hodson Bay Waterfront Park Project
Hodson Bay, Townland of Barrymore, Co. Roscommon

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed development shall not be carried out unless the Commission has approved it or approved it with conditions.

If you have any queries in relation to the matter please do not hesitate to contact the undersigned officer of the Commission at laps@pleanala.ie

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

JA02



An
Coimisiún
Pleanála

SID Online Observation

Online Reference
SID-OBS-006148

Online Observation Details

Contact Name
Emma Pillion

Lodgement Date
07/10/2026 14:58:41

Case Number / Description
324610

Payment Details

Payment Method
Online Payment

Cardholder Name
Emma Pillion

Payment Amount
€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

☐

Yes

☐

No

Request Emailed to Senior Executive Officer for Approval

☐

Yes

☐

No

Signed

EO

Date

Finance Section

Payment Reference

ch_3UNvMjB1CW0EN5FC1W52D2kK

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board
Member

Date

Date

An Coimisiún Pleanála Case Ref: JA20.324610

Description: Hodson Bay Waterfront Park Project

Site Location: Hodson Bay, Barrymore, Co. Roscommon

Applicant: Roscommon County Council

Case Type: LA Non-Road Development – Application

Observer: Eugene Fayne, Michael Evans and Noirin O'Rourke
(Trustees of Athlone Golf Club), Athlone Golf Club,
Hodson Bay, Athlone, Co. Roscommon, N37 AX07

Agent: Emma Pillion Planning (EPP), Fardrum, Athlone, Co.
Westmeath, N37 XW01

Postal Address for Correspondence: Agents

Athlone Golf Club, Hodson Bay



An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902
07/10/2026

RE Hodson Bay Waterfront Park Project, Hodson Bay, Barrymore, Co. Roscommon

Dear Sir/Madam,

EPP has been retained by Athlone Golf Club, Hodson Bay, Athlone, Co. Roscommon, N37AX07 to prepare a submission in respect of the above proposed SID application made by Roscommon County Council (hereafter referred to as “RCC”). This submission is accompanied by the statutory fee of €50 for observations on strategic infrastructure.

Athlone Golf Club (hereafter referred to as “AGC”) have been engaging with RCC officials regarding the proposed development as the golf club owns the lands for which some have been labelled ‘*permanent land acquisition*’ in this application. RCC wish to purchase these lands, however the lands have not been valued, nor the proposed purchase progressed beyond initial engagement at the time of this submission. Any proposed purchase of these lands by RCC would be subject to an EGM and members of AGC voting to accept the proposal. This submission is made largely in support of the overall proposal, whilst highlighting the golf club’s concerns regarding some aspects of the proposed development it’s possible phasing process.

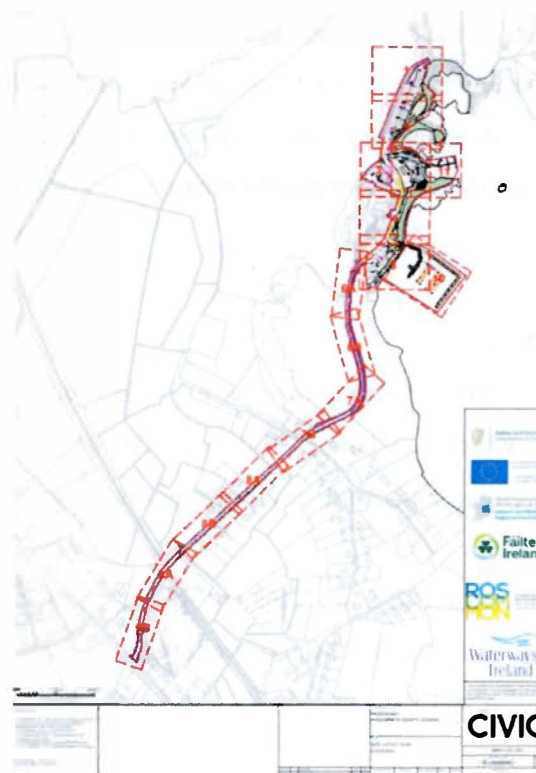
1.0 Background to Athlone Golf Club

AGC was founded in 1892 and moved to its current location on the bank of Hodson Bay in 1938 on 42Ha of land. AGC is a members-owned club, with 930 members (674 adults and 256 junior members). The club is run by a management committee which consists solely of volunteers, alongside 7 staff who

work between the course, administration, the shop and maintenance. AGC also has a restaurant facility within the clubhouse which is licenced to a commercial entity.

AGC has a growing visitor base and the positive visitor experience has resulted in green fees contributing to 25% of the club's income annually. The course and clubhouse views and the peace and tranquillity of the course on the bank of Lough Ree are established amenities for members and visitors alike in AGC for over 80 years. AGC has a strong membership base and parking in the AGC car park across peak season is at capacity (120 spaces) and during golf events, overflow parking spills down to Hodson Bay at present. At present AGC have no mechanism to prevent their car park being used as an overflow car park for the proposed development and if this did occur, there would be health and safety issues in addition to nuisance to AGC members and visitors to the restaurant.

Overview of the Proposed Development



Source: SID application

Planning Grounds of Observation

2.0 Proposed Development

The proposed development consists of, *inter alia*, the demolition of the existing water sports facility & temporary relocation of same during construction period, the construction of a new water sports pavilion to include café, mixed use building, plaza & canopy, 10no. seasonal marquees, maintenance building, external showers, semi-public plaza space, marina redevelopment and extension to breakwater and jetty, enhanced boating facilities, new public realm upgrades namely new playground and water-based facilities, new promenade, landscaping, new public spaces for civic & other events, active travel shared cycle/pedestrian path for length of L2020 to the N61, wayfinding works, additional 151 car parking spaces, and all other associated works.

3.0 Planning Policy

The subject site lies within the administrative boundary of Roscommon County Council and falls within the planning remit of the Roscommon County Development Plan 2022-2028 (hereinafter referred to as the RCDP) and contained therein is the Hodson Bay/Barrymore Area Plan (hereinafter referred to as HBBAP) which provides guidance for the area with regard to zoning and the development potential for the area.

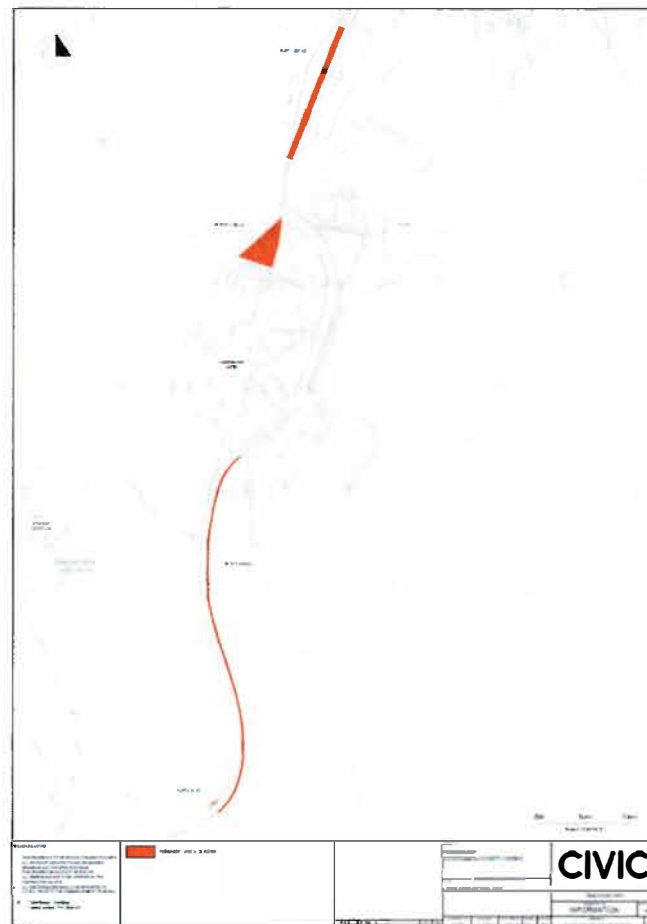
4.0 Proposed Land Acquisition

The proposed development outlines the need to acquire 4no. land parcels from AGC as follows:

- 1) Plot 1: A long, narrow section of land, 927m² in area, required by the proposed development to provide additional/rearranged parking arrangements on the northern edge of the proposed development.
- 2) Plot 2: A triangular section of land, 1162 m² in area, known colloquially by AGC as the 'greenkeepers yard' and required by the proposed development during the construction phases as a site office and later to provide a new car park to the north of the proposed development.

- 3) Plot 3: A long narrow section of land, 612m² in area, on the waterside of AGC and required by the proposed development to provide the active travel path and pedestrian crossing alongside the golf course and L2020 to the east of the proposed development.
- 4) Plot 4: A small section of land, 6m² in area, on the waterside of AGC and required by the proposed development to provide a pedestrian crossing alongside the golf course and L2020 to the south of the proposed development.

Land Acquisition Map Showing 4no. AGC in Red



Source: SID application

5.0 AGC Land Acquisition Status

Whilst some negotiations have taken place in relation to the proposed land acquisition, no deal has been made to AGC by RCC for the subject lands. Any offer that may be made would be subject to an EGM and would require a vote from all members to sell the lands.

6.0 Construction Phase

Strategic Aim 12 of the RCDP outlines that the plan aims to:

"Foster the creation of an attractive and competitive business environment by supporting economic development, job creation, tourism and prosperity for all."

AGC wish to be considered as part of the proposed development as a community facility, a tourist attraction and a long-serving rates contributor in the Hodson Bay area. The application as lodged outlines that the funding for the proposed development is likely to be sourced from multiple funds and the proposal will be phased as a result.

This information is critical for AGC and even provisional phasing proposals would be very helpful at this stage to provide insight for the club members and the possible impacts on the environment, sections of the course subject to flooding and the European sites.

The phasing of the construction process and the undetermined nature of same is causing grave concerns to AGC as it is virtually impossible to ascertain the potential impact of the proposed development in the absence of same. AGC fear that the construction phases could limit their ability to offer an 18-hole championship course to members and visitors for an indefinite period of time, with little or no control over the process. This in turn would impact membership income, society income and green fees and potentially recovering from loss of income from the construction phase alone could take years.

To assess how the golf course would be operated and what works are required to facilitate same, AGC would need to know when each section of fencing off (and associated works) would be commencing and concluding as part of the construction phasing.

Policy Objective ED 6.25 of the RCDP outlines that the plan aims to:

"Promote the development of sustainable tourism as part of our economy, that recognises our landscapes, our cultural heritage and our environment."

The proposed development requires works by AGC to facilitate the proposed development. The proposed development requires the land acquisition of the 4no. plots from AGC, but the works required by the club to facilitate the proposed development have not been included or considered as part of the SID application. AGC considers this to be short-sighted and largely uncooperative given the volume of studies, environmental assessments and statutory obligations the proposal requires. In turn, if the acquisition is secured, it will result in higher compensation costs and further delays whilst the members attempt to navigate a complex planning arena with no specialist knowledge in the area. The works required by ACG if the proposed development were to proceed would be extensive and disruptive and include, *inter alia*;

- Remodelling the 4th hole to address safety concerns arising from the proximity of the proposed development and to address the proposed land acquisition,
- Remodelling the 17th green to address the risk of balls entering the public road following the proposed refencing after the proposed land acquisition,
- Remodelling the bunkers on the 2nd hole to reorientate away from the public road after proposed land acquisition,
- Development of a new greenkeepers yard to facilitate the proposed acquisition of the current one, this will involve a new concreted, walled yard, new wash bays for equipment, and
- The installation of additional hard-core on existing gravel tracks to allow articulated lorries deliver aggregates to the proposed new greenkeepers yard.

7.0 Land Acquisition

Policy Objective ITC 7.28 of the RCDP outlines that the plan aims to:

"Improve the streetscape environment for pedestrians, cyclists, and people with special mobility needs by providing facilities to enhance safety and convenience, including separation for pedestrian infrastructure from vehicular traffic."

7.1 Plot 1

The acquisition of this parcel of land would require all works to be carried out outside of peak season for AGC. The works to the realignment of fencing would require the new fencing up to 20m high to be installed and completed between 1st November and 28th February, when AGC can facilitate reduced holes in play.

7.2 Plot 2

The acquisition of this parcel of land would require the relocation of the greenkeepers yard by AGC in off-peak season to be completed in advance of any Council works. All Council works to be carried out outside of peak season for AGC to ensure minimal disturbance to greenkeepers operations during peak season which includes daily course maintenance and cutting. The works to the realignment of fencing would require the new fencing up to 3m high to be installed and completed between 1st November and 28th February, when AGC can facilitate reduced holes in play. The new greenkeepers yard to be developed by AGC to the southeast of the existing yard (plot2) will require continued and constant access for articulated lorries and access to a water supply, even during the construction process and these have not been noted in the current proposals and are vital for the operation of the course.

7.3 Plot 3 & 4

The acquisition of this parcel of land would require all works to be carried out outside of peak season for AGC. The works to the realignment of fencing would require the new fencing to be installed up to 15m high and completed between 1st November and 28th February, when AGC can facilitate reduced holes in play. AGC would require all grading and replanting of the course at this location by RCC to be completed also during this timeframe. The NIS incorrectly refers to the proposed fencing as being 449m of 10m high fencing, which should in fact be 15m high.

Ideally, all remodelling of the golf course, including the works required by AGC, would be carried out in parallel to RCC works during the period of 1st Nov – 28th February to reduce the impact on the course and ensure quick resumption to 18-hole playability.

AGC would like to request that further information be sought from RCC for drawings outlining the land acquisition parcels, AGC lands and the proposed fencing treatment and fencing heights. The drawings

do not appear to outline specifically each section of fence, the associated heights and step-downs clearly. Given the importance of the proposed fencing, the associated H&S risks and in-turn the liability for AGC, this matter is extremely important for the safe and viable operation of the club.

8.0 Landscaping

The proposed landscaping plan outlines 47 proposed trees to be replaced on the eastern side of the L2020 on what appears to be lands owned and to be retained by AGC. The level of proposed replanting on club lands seems excessive in the context that the golf club are already under pressure from a lack of lands to develop practice areas and the proposed land acquisition. Despite the foregoing, the club are still trying their best to facilitate the proposal overall and consider that the replacement of trees on their lands should only reflect those removed from their lands to facilitate the proposed development.

9.0 Access & Traffic

Policy Objective ITC 7.25 of the RCDP outlines that the plan aims to:

“Promote walking and cycling as efficient, healthy and environmentally friendly modes of transport by securing the development of a network of direct, comfortable, convenient and safe cycle routes and footpaths, particularly in urban areas and in the vicinity of schools.”

AGC welcome the proposals by the council to ensure free flow of traffic on the L2020 during the construction period and the undertaking to prevent any construction traffic or resulting overflow parking in the club lands. The club require specific details of how RCC propose to enforce this. Once this has been received, AGC can assess whether their concerns have been considered and fully addressed in the application.

10.0 Parking

AGC are very concerned about the proposed parking arrangements, particularly in the context that their facility is already at full capacity during peak golfing season (April-September). The members are concerned that when the capacity at the proposed development reaches its limit, that there will be

unauthorised parking within their facility. Of particular importance is how the parking situation will be managed during the construction period.

11.0 Noise

Strategic Aim 13 of the RCDP outlines that the plan aims to:

"Ensure that the county is served by adequate community facilities and amenities, which add to the quality of life of residents of the county."

The construction and operation period of the proposed development are of concern to AGC. The members contend that the inflatable water park has already significantly impacted noise levels in the area and during peak season considerably disturb the established amenity of the fourth hole complex and the complexes on the eastern side of the L2020. The water park was granted permission without any consideration to the amenity of the golf course and the members have grave concerns regarding the undefined construction period and the proposed 'outdoor events' space in the application in the context of noise and the management of the amenities of existing facilities and businesses in the adjoining areas. AGC would request that music events/outdoor music be prohibited and conditioned accordingly.

Policy Objective HB 1 of the HBBAP sets out the need to:

"Facilitate suitable leisure, tourism and amenity developments on lands zoned Leisure Tourism / Amenity in order to strengthen the significance of Hodson Bay / Barrymore as one of the main tourism/recreational attractions in County Roscommon and regionally."

AGC supports the principle of the proposed development, however, the need to maintain the recreational attraction of the area requires further consideration prior to the consent of the subject development. Of particular concern to the AGC members is the fact that Chapter 11 'Noise & Vibration' of the EIAR takes noise sensitive readings at the AGC club house, rather than at the course boundaries closest to the proposed works. The proposed development would have a detrimental impact on the 4th hole, for example and would result in a significant alteration to the established amenity associated with AGC. The proposed development, whilst not required to take account of

recreational noise receptors, has had little or no regard to AGC, considering the proposed acquisition required to facilitate the development.

Policy Objective HB 4 of the HBBAP contained within the RCDP sets out the need to:

“Facilitate low intensity tourism and amenity development only (for example, camping or glamping facilities, walking / cycling routes) in currently undeveloped areas within the Leisure Tourism / Amenity zone which is in proximity to Natura 2000 designated sites. Proposals should utilise existing servicing infrastructure.”

AGC remain concerned that the proposed external ‘plaza’ style proposals for ‘outdoor events’ represent intense tourism in an area as environmentally sensitive as Hodson Bay. AGC oppose the ‘events’ proposal and request that it be removed from the development in its entirety.

12.0 Established Amenity at Golf Club

Strategic Aim 11 of the RCDP outlines that the plan aims to:

“Protect and enhance the natural assets of County Roscommon, including clean water, biodiversity, landscape, green infrastructure, heritage and agricultural land.”

The proposed development will certainly enhance and promote the Hodson Bay area as a destination for leisure/recreation. AGC largely welcomes the proposal and acknowledges the commitment to investment in the area. However, the club wishes to be considered as a long-standing community and tourist facility who have contributed to investment in the area, to tourism, to the Council (by way as a committed rate payer) for over 80 years in Hodson Bay. Golf courses are recreational spaces and AGC has an established amenity associated with the etiquette of golf and the general peace offered by the facility. The proposed development will result in a level of disturbance, which, when considered in conjunction with increased tourism, enhanced facilities and the presence of the inflatable waterpark already in situ, which will have a detrimental impact of the tranquillity of the course on the banks of Lough Ree.

13.0 Flooding

The proposed development will likely give rise to alterations to the flood levels in the immediate area surrounding the development site. As such, it is envisaged by AGC that this will result in higher flood levels being experienced on the southern portion of the course, which floods annually to approximately 1.5 metres higher than summer water levels. AGC request that additional information be sought regarding the extent of impact the proposed development will have regarding flood levels on the southern portion of the course in the event that the proposed development was permitted.

14.0 Golf Club/Members

AGC is owned and run by its members, facilitated by a voluntary management committee. Whilst the proposed development is generally looked upon favourably by AGC, the land acquisition process is contingent on the members voting in favour of same. The club members currently feel that Roscommon County Council haven't fully engaged with AGC in relation to the proposed development. The members also consider that if there had been earlier and meaningful engagement, the potential concerns arising at this stage could have been designed out of the proposal with due consideration having been given at an early stage for potential impacts on the operation of the golf course and for wider health and safety concerns. AGC believe that it is imperative at this stage that their concerns are addressed so the proposal can proceed in its most considered format, without jeopardising existing, long-established facilities in the area.

15.0 Loss of Income

AGC is concerned about the prospective loss of income during the undefined construction phase of the proposed development. The construction phase has the potential to severely impact the normal operations of the course and given that the phasing of the development hasn't been addressed, it's difficult to quantify the potential impacts on AGC at this stage. The potential economic impact of the proposed development and the associated construction phases have not been addressed in the application, save for a reference to a possible increase in green fees. AGC have genuine concerns with regard to the potential for loss of income long-term as a result of the proposed development, even

beyond the construction phase. Some projected issues have been identified by the members regarding the construction period:

- The fourth hole, alongside 'Plot 1', will be so negatively impacted by the proposed development that it will affect the club's ability to maintain the courses 'championship' status,
- The elongated nature of the works at 'Plot 3' and works at 'Plot 4', if not managed and carried out efficiently and effectively outside of peak golfing season in conjunction with the AGC committee, will render the course a reduced 18-hole course for the undefined duration of the works,
- AGC would welcome the proposal that all works relating to the course and land acquisition be carried out in phase 1, for example, and RCC and AGC would carry out all works in parallel, restoring full operations to the golf course within the period of 1st Nov – 28th February,
- The works to the golf course to facilitate the proposed development to redesign holes, develop a new greenkeepers yard and regrade the course on the eastern side of the L2020 have not been identified in the SID application and therefore a separate set of reports and assessments are required to obtain consent for such works, and
- The disruption in general from the undefined construction period for the proposed development will likely give rise to a loss of membership and visitor/green fees for the construction period. Given that this is an undefined period, the impacts at this stage are unknown. Even a modest disruption of 10-20% to business for AGC during a protracted construction period would have a huge financial impact on AGC. The proposed development, if left unsubstantiated with regard to the construction phases, could have a deleterious impact on the club, its viability and its proposed reinvestment plans back into the facility in the future.
- AGC considers that the potential impacts of the proposed development on their facility have not been given any requisite consideration in the application and the mention of increased green fees was included haphazardly without full consideration being given to the full economic effects of such a development alongside the golf course.

16.0 Further Information

The below are matters AGC consider further information and consideration in advance of a decision:

- i. Drawings outlining the land acquisition parcels, AGC lands and the proposed fencing treatment and fencing heights at each of the affected locations.
- ii. Detailed proposals regarding the phasing of the proposed development, particularly in the context of the seasons during which works will take place and the total proposed construction time so that members can consider proposed impact on their facility. AGC would welcome the proposal that all works relating to the course and land acquisition be carried out in phase 1, for example, and RCC and AGC would carry out all works in parallel, restoring full operations to the golf course within the period of 1st Nov – 28th February,
- iii. Detailed proposals regarding the proposed construction plan for each phase to enable the absorbing community, facilities and businesses to assess the likely impacts of the development in an informed manner.
- iv. Details of the proposed access, traffic and parking in the area will be enforced during the construction and operational phases of the proposed development.
- v. Detailed proposals regarding how each plot of land proposed for acquisition will be treated and how the works proposed to be carried out will facilitate AGC to ensure continuity of operations at the club throughout.
- vi. Revised landscaping proposal showing only the replacement of trees on AGC lands that were removed by the works to facilitate the proposed development.
- vii. Detailed proposals regarding the proposed open-air plazas, their uses and how the hours of operation and noise impact will be managed. AGC would like to request that the playing of music in open areas be prohibited throughout the subject site.
- viii. AGC request that additional information be sought regarding the level and extent of impact the proposed development will have on the existing high-water levels on the southern portion of the course in the event that the proposed development was permitted.

- ix. The inclusion of the proposed works required for the provision of the new greenkeepers yard as part of the Local Authorities application to enable the entire development to be considered comprehensively.

18.0 Possible Conditions

The following matters are considerations which AGC believe should be included in conditions of any grant of permission in relation to the proposed development:

- a. During peak tourism and golfing season, for the duration of the construction period, parking stewards be provided to ensure smooth flow of traffic and prevent unauthorised parking in ACG and along the L2020.
- b. Prior to the commencement of development, a full construction and site management plan shall be submitted to the Planning Authority for compliance. The plan should detail how existing facilities in the area will be facilitated regarding the smooth operation of their business throughout the construction phase.
- c. The plan should detail how the proposed development (both construction and operation) will ensure that it does not give rise to noise and undue disturbance to AGC existing facilities in the area.
- d. The playing of outdoor music is prohibited in the proposed development.
- e. Construction phases directly impacting the ability of AGC to operate be limited to off-season i.e. winter months 1st November - 28th February.

19.0 Costs

AGC wish to be considered for the application of cost recovery in due course, whilst the costs are modest, the club is owned and run by it's members, who are voluntary and such costs are paid for by members subscriptions.

20.0 Conclusion

AGC support the Council in their endeavours regarding the proposed investment into the Hodson Bay area. The proposed development would likely give rise to a general uplift to the area and raise the profile of Hodson Bay as a tourist and recreational centre in Roscommon. The proposed development poses serious financial and operational concerns for the Golf Club however and AGC members are gravely concerned about the potential loss of income both during the construction works and in the long-term, noise, parking and their ability to maintain operations without compromising the club they've worked so hard over the years to build.

In addition, the long-term impacts of the proposed development are unknown as the rural nature of the golf course settings would be irrevocably altered as a result of the proposed development, if permitted in its current form. Despite engaging with RCC during the process, these concerns have been largely unaddressed in the current proposal.

Despite the foregoing, AGC are still largely in support of the proposal, subject to their concerns being heard and addressed during the planning process, but ultimately the decision to sell any land belongs to the AGC members through their vote at an EGM.

AGC respectfully trust that An Coimisiún Pleanála will take their reasonable concerns into account in the decision-making process and the outcome will result in the best possible development in line with the proper planning and sustainable development of the area.

Yours sincerely,



Emma Pillion FIPI