Our Case Number: ACP-324610-26

Your Reference: Hodson Bay Group

An Coimisiún Pleanála

Tom Phillips & Associates
c/o John Gannon
Managing Director
80 Harcourt Street
Dublin 2
D02 F449

Date: 23 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

Kevin McGettigan
Executive Officer
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JA02

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AN COIMISIÚN PLEANÁLA
LDG- 090645-26
ACP-
13 OCT 2026
Fee: € 50 Type: CASH
Time: 14:10 By: HAND

Tuesday 13th October 2026

Dear Sir/Madam

Re: Hodson Bay Waterfront Park, Hodson Bay, Barrymore, Co. Roscommon
Case Ref: JA20.324610

Introduction

Tom Phillips + Associates, Town Planning Consultants have been retained by the Hodson Bay Group, Hodson Bay Hotel, Barrymore, Co. Roscommon, N37 XR82 to make this Observation in relation to the above referenced proposal as submitted by Roscommon County Council (RCC) to ACP. This Observation is being made before the statutory deadline of 16th October 2026 and is accompanied by the statutory fee of €50.

This proposal is a very significant project taking place in a highly constrained location adjoining a significant and long-established tourism use (Hodson Bay Hotel) and on highly environmentally sensitive lands involving direct construction works within the Lough Ree SAC and SPA. It is incumbent, therefore, on the Commission to thoroughly review the EIAR and AA methodology utilised by the Applicant and ensure that all survey and assessments submitted with this application are sufficiently robust and that all proposed mitigation measures are capable of full implementation. It is not appropriate in this case that important matters are left for pre-commencement agreement with the Planning Authority with no public involvement after the completion of the planning assessment stage. Where any doubt exists in this regard, the Commission must err on the side of caution and either seek the required further information during the planning process or refuse permission.

Primary Concerns

At the outset, it should be emphasised that Hodson Bay Hotel is not opposed in principle to the enhancement of tourism and recreational infrastructure at Hodson Bay at an appropriate scale. The proposed re-development of the marina, watersports facilities and associated public realm has the potential to contribute positively to the overall tourism and recreational offering of the region, provided that it is properly planned, adequately supported by infrastructure and appropriately phased.

The Hotel recognises the important contribution that the watersports facility makes to tourism, recreation and public enjoyment of the waterfront. The concerns raised in this Observation do not relate to the principle of improving or expanding recreational facilities.

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Rather, the issues of concern relate to the sequencing, funding, delivery and supporting infrastructure necessary to ensure that the proposed development can proceed sustainably and without unacceptable impacts on existing users, the local community, an established tourism enterprise and the wider waterfront amenity. The Commission must also very carefully consider whether this Project, as currently scaled and having regard to the highly constrained nature of these lands on multiple fronts (means of access, extreme environmental sensitivity, long standing car parking under provision, co-existence with other established uses, etc), is acceptable in proper planning and sustainable development terms and will not give rise to unacceptable impacts arising from overdevelopment. The Commission will also need to consider whether a more modest form of development may be more appropriate in this location.

Our Client's support for the principle of development is fully contingent on resolving several major concerns with the current proposal as noted and, in the absence of the appropriate resolution of these matters (including appropriately worded planning conditions should consent be granted), this application cannot be permitted in its current form. The Hodson Bay Hotel complex, including vital car parking provision, is the closest neighbouring land use to the proposed development and, arising from this proximity and the composition of the red line planning boundary, is inextricably linked to it.

In particular, the Hotel's concerns relate to:

- The absence of certainty regarding the funding, timing and delivery of critical parking, roadway and public realm infrastructure.
- The inadequacy of the proposed development and construction phasing arrangements.
- The proposed substantial increase in visitor capacity at an already highly constrained location.
- The cumulative expansion of the watersports facility without corresponding additional parking provision.
- The potential impact on public access to and enjoyment of a waterfront amenity widely used by the local community and visitors.
- The proposed use of existing parking areas and lands adjacent to hotel operations for construction compounds and associated activities.
- The potential economic consequences for one of Co. Roscommon's largest employers.
- The potential for prolonged disruption to hotel operations, employment, conference business and wider tourism activity.
- The risk that congestion, access difficulties and inadequate supporting infrastructure could undermine the success and reputation of the waterfront project itself.

These concerns are capable of being addressed only if the Commission is satisfied that the required supporting infrastructure will be delivered in the appropriate sequence and if robust, precise and enforceable planning conditions are imposed. If the necessary sequencing and mitigation cannot be secured with sufficient certainty by condition, the visitor-generating elements of the proposed development should not be permitted in their current form.

In summary, if the proposed development cannot operate in conjunction with the long-established Hotel use and be correctly managed during a lengthy and disruptive 30-month construction period (and this may extend beyond this timeframe, subject to funding availability) in a manner that will not adversely impact Hotel operations, then we cannot support the Project. Otherwise, there is the potential for very significant adverse long term economic impacts on the Hotel operations, which will also seriously damage the tourism offering of the region and related employment and economic benefits in which the Hodson Bay Hotel plays a pivotal part.

In summary, the Hodson Bay Waterfront Park Project cannot proceed at the expense of the Hodson Bay Hotel. Our primary concerns are described in further detail below.

Third Party Consents

Our Client wishes to note its concerns regarding how this Project is being presented with respect to landownership and related consent. Whilst it is acknowledged that this is not a conventional planning application but rather what is generally termed a 'Part 10' application submitted directly to ACP, it is considered unacceptable that third party lands are included in the red line application boundary in the absence of any form of written consent from the relevant landowners. To reiterate, the Hodson Bay Hotel Group has not consented to the inclusion of any of its lands within the application boundary, and we understand this is also the case regarding the adjoining Athlone Golf Club. Third party lands form a crucial part of the subject proposal notably in relation to the provision of additional car parking. This approach is concerning on the basis that a Project and site is being advanced through the planning process and being assessed without the issue of land ownership having been properly resolved, prior to lodgement.

The covering submission prepared by MKO on behalf of RCC states in this regard:

> *'Táilte Éireann Land Register Information*
>
> *The Proposed Development red line boundary encompasses lands subject to a number of ownership interests. Drawing No. 31022-DR-CIV-CE-00005 to 31022-DR-CIV-CE-00007 prepared by CIVIC Engineers illustrates land register information obtained from Táilte Éireann records and is provided for contextual and informational purposes only. The drawing should not be interpreted as a definitive record of all ownership interests, legal rights, burdens, easements, wayleaves, or other interests that may exist within the Proposed Development boundary'.*

We would query how crucial drawings supposedly showing the extent of the proposed development can be described as being for *'contextual and informational purposes only'* and not interpreted as a *'definitive record of all ownership interests, legal rights, burdens, easements, wayleaves, or other interests that may exist within the Proposed Development boundary'.* We contend that both the red line application boundary and the associated legal status of the lands within that boundary must be clear and fully resolved in a planning submission, before entering any form of planning consent process. In addition, where the Project in question necessitates EIA and AA, as is the case here, and noting the extreme sensitivity of the subject site and the proposal's direct interface with highly sensitive environmental designations, there should be no doubt whatsoever regarding the extent of the site; who controls the lands in question or whether an application boundary is in any way notional. This could potentially result in the entire EIAR or AA being grounded on an incorrect interpretation of what constitutes the site and Project for planning purposes. In our opinion, this comprises an unsatisfactory and uncertain approach to the subject development that requires careful consideration by ACP.

We further note that the application documentation states:

> *'A pre-connection inquiry has been submitted to Uisce Éireann on June 5th, 2026, to confirm capacity for the Uisce Éireann infrastructure to accept discharge from the site. The application reference number is CDS26004773'.*

Once again, whilst noting that this is not a conventional planning application, we submit that in the interests of proper planning and sustainable development in a highly sensitive location, we consider that a confirmation of feasibility from Uisce Éireann should have been received and enclosed with this application, rather than merely evidence that this has been sought.

The outcome of this pre-connection inquiry is unknown at this point, and Uisce Éireann's response may have major implications for the delivery and phasing of the Project, depending on drainage and water supply capacity in the area, or whether significant upgrades may be needed. All of the above should be known and included in the Project, prior to submission and be reflected in the application documentation, EIA and AA assessments and mitigation. We would ask ACP to carefully consider this matter in its assessment of the proposal.

Economic Importance of Hodson Bay Hotel

It is important to acknowledge and understand at the outset the economic importance of the Hodson Bay Hotel both in local and regional terms and the potential significant impacts this Project may have in this regard.

Hodson Bay Hotel is not simply an adjoining property owner potentially affected by the proposed development. It is one of the most important tourism and hospitality businesses in the Midlands and one of the largest private-sector employers in Co. Roscommon.

The Hotel currently employs approximately 335 people. These are year-round positions that support hundreds of local families and households throughout Roscommon, Westmeath and the surrounding region. The economic contribution of the Hotel also extends substantially beyond its direct employment.

The Hotel generates approximately €16,100,000 annually in economic value for the local and regional economy, comprising:

- Wages of approximately €6,600,000 per annum.
- Taxes paid of approximately €3,900,000 per annum.
- Marketing and promotion expenditure of approximately €470,000 per annum, promoting both the Hotel and the broader tourism offering of the region.
- Commercial rates and water charges of approximately €400,000 per annum.
- Additional indirect economic value of approximately €4,800,000 per annum through expenditure with local suppliers, service providers and business partners.

The additional indirect economic value is calculated using the CSO output multiplier for the accommodation sector. This states that approximately €0.32 of every euro earned by the Hotel flows into the wider economy through suppliers, contractors and service providers.

The Hotel, therefore, acts as a significant economic anchor within the region. In addition to direct employment, it supports numerous local enterprises, including food suppliers, maintenance contractors, transport operators, tourism providers, tradespeople, event suppliers and professional service providers.

The Hotel comprises 176 bedrooms, extensive leisure facilities, multiple bars and restaurants, alongside conference and banqueting facilities capable of accommodating up to 1,200 delegates daily. Annual occupancy is approximately 80%, illustrating its importance as a year-round tourism, conference and leisure destination.

Any significant or prolonged adverse impact on the Hotel's accessibility, operation or visitor experience would consequently have implications extending well beyond the interests of a single business. It could affect employment, tourism revenue, conference activity, local suppliers and regional economic output.

The Hotel is, therefore, a strategic economic and tourism asset. Protecting its continued sustainable operation, while facilitating properly planned improvements to the waterfront, should be regarded as a matter of significant public interest and an important consideration in the assessment of what constitutes the proper planning and sustainable development of the Hodson Bay area.

Funding, Deliverability and Phasing

The requirement to deliver supporting infrastructure in advance of any increase in visitor-generating capacity was specifically raised during the pre-planning consultation process between Roscommon County Council and local stakeholders, including the Hotel. During these consultations, the Hotel repeatedly stressed that no expansion of visitor-generating facilities should occur until the required additional car parking, roadway infrastructure and supporting public realm works had been completed and made operational.

The Hotel specifically requested that the development be phased, so that the necessary enabling infrastructure would be delivered before any material increase in visitor capacity. Roscommon County Council advised that this sequencing was not possible. The Council stated that the various elements of the overall development were dependent upon separate funding streams and grant programmes. The Council further indicated that there was no identified funding source available at that time for significant road and parking infrastructure. This raises a fundamental planning concern regarding the sequencing and practical deliverability of the development.

The Council is seeking approval for a development that would have a threefold increase in visitor demand while relying upon highly uncertain future funding arrangements for the parking, roadway and public realm infrastructure required to accommodate that demand. On the information provided during stakeholder consultation, there is not sufficient certainty regarding the funding, timing or delivery of all the infrastructure necessary to support the proposed threefold increase in visitor numbers.

The Commission should distinguish between mitigation measures that are identified conceptually and mitigation measures whose funding, programming and delivery have been demonstrated with sufficient certainty. A mitigation measure cannot be relied upon to support the acceptability of a proposed development, if that mitigation measure is dependent upon an uncertain future funding stream and it is not required to be operational before the impact that it is intended to mitigate arises.

The proposed funding and phasing structure creates a risk that visitor-generating elements could proceed, while critical supporting infrastructure remains incomplete, delayed or unfunded. Such an outcome would be premature and unsustainable at a location already experiencing considerable parking and traffic pressures.

The issue is not commercial competition or inconvenience to an individual business. The planning issue arising is whether a proposal seeking to facilitate approximately 109,000 additional watersports visitors annually can be regarded as sustainable, where the site is already congested and the infrastructure required to accommodate that expansion has not been demonstrated to be funded, programmed and deliverable in advance of the increased demand. The proper sequencing of the development is, therefore, essential.

The parking facilities, road improvements, traffic-management measures and supporting public realm should be completed and operational before the construction of those elements that will generate the additional visitor demand begins.

Overall Visitor Experience and Project Success

The long-term success of Hodson Bay Waterfront Park will depend not only on the quality of the proposed facilities, but also on the overall experience of arriving at, accessing and using the destination.

If local residents and visitors encounter congestion, parking shortages, construction conflicts and access difficulties upon arrival, the quality and reputation of the overall destination, which has taken decides to build and establish, could be undermined potentially with long term implications. The provision of new facilities alone will not achieve successful or sustainable tourism development, if the infrastructure required to support those facilities is inadequate or delivered too late.

Ensuring that the necessary parking, road and public realm infrastructure is operational before visitor numbers materially increase is, therefore, crucial not only for the Hotel, local residents and existing users, but also for the long-term success of the waterfront project itself.

The Hotel's concerns are consequently aligned with the Council's stated objective of enhancing Hodson Bay as a tourism and recreational destination. Properly sequenced infrastructure will protect existing activities, improve public access and support the long-term viability and reputation of the proposed development.

Existing Traffic and Car Parking Constraints

An issue of significant concern for our Client is the proposed car parking provision serving both the existing Hodson Bay Hotel complex and the Project and the method by which overall existing and proposed car parking requirements have been considered and calculated. We also have serious concerns regarding the management and availability of car parking provision during the 30-month construction stage and in relation to certainty regarding the delivery of the final car parking arrangements in the last phase of the Project.

By way of context, it is acknowledged by all parties that the application site is already operating under significant traffic and parking constraints. It is important, therefore, to understand the planning and historical context of the existing parking provision. The existing car parking facilities serving the area were provided as part of the planning permissions associated with the development and expansion of Hodson Bay Hotel. Those spaces were required to serve hotel guests, conference delegates, leisure club users, restaurant customers, wedding functions and other activities associated with the Hotel's operation.

Importantly, the parking provided in conjunction with the Hotel has also facilitated public access to the Hodson Bay waterfront for many years. Local residents, community groups, walkers, runners, swimmers, boating enthusiasts, families and other visitors have used and relied upon this parking provision to access and enjoy the waterfront amenity. The existing car parking resource has, therefore, come to function as shared infrastructure supporting a range of established uses at Hodson Bay.

The existing parking currently performs three inter-related functions:

1. It serves the operational requirements of Hodson Bay Hotel.

2. It accommodates demand generated by the watersports facility.

3. It facilitates public access to and enjoyment of the waterfront amenity.

The watersports facility has been developed, and expanded over time, which has resulted in increased visitor numbers and parking demand. However, that development and expansion have occurred without any corresponding parking spaces being provided to accommodate the additional demand generated by the watersport's operation.

As a consequence, parking originally provided to satisfy planning requirements associated with the Hotel has increasingly been required to absorb demand arising from the expanded watersports facility, while continuing to facilitate access to the waterfront by the local community and wider public.

The application documentation acknowledges that existing parking facilities regularly operate at or above capacity. The practical experience is that parking demand frequently exceeds available capacity. During peak periods, hotel guests, conference delegates, leisure club users, restaurant customers, and members of the public seeking to access the waterfront regularly encounter difficulty finding an available parking space.

Local residents and visitors wishing to use the waterfront for walking, swimming, boating, recreation and leisure can similarly experience difficulty accessing the amenity because of the lack of available parking. At busy times, visitors are required to circulate through the area while waiting for spaces to become available and may ultimately be unable to find parking or conveniently access the waterfront.

This is, therefore, not an issue confined to hotel operations. It demonstrates that the existing shared parking resource, which was originally delivered through the development of the Hotel and has historically facilitated public access to the waterfront, is already under significant pressure. The Hotel's long-standing position has been that the existing parking provision is insufficient to accommodate current levels of demand and that additional parking infrastructure is required simply to address the existing deficiency.

Against this background, it is particularly concerning that the proposed development seeks to facilitate a substantial further increase in visitor numbers associated with the watersports facility. Annual watersports visitor numbers are projected to increase from approximately 55,000 to approximately 164,000 - an increase of approximately 109,000 annual visitors - a near-threefold increase in overall annual visitation.

The existing parking resource has already absorbed the effects of the watersports facility's expansion without corresponding additional parking provision. The proposed development risks further intensifying that existing imbalance. The Commission must, therefore, consider whether a substantial increase in visitor capacity can be sustainably accommodated at a location where existing parking demand already exceeds available capacity and where there is insufficient certainty regarding the funding, timing and delivery of the additional supporting infrastructure.

The Traffic and Transport Report ('the Report') prepared by CIVIC, and as replicated in the EIAR, notes that there are currently 353 parking spaces serving the existing Hodson Bay Hotel, the existing Baysports Waterpark, those using the marina and individuals accessing the shoreline and Lough Ree. This parking provision is distributed in two main areas described in the application documentation as 'Central Hodson Bay' (comprising Car Parks A, B and on-street parking) and 'North Hodson Bay' (Car Park C). The existing car park is frequently full and is regularly operating at, or over, capacity as acknowledged in the Report. This results in informal and illegal parking occurring on grass verges, double yellow lines, etc.

In terms of parking demand, this Report identifies a total hotel-related requirement of 374 spaces (176 for overnight guests and 198 for daytime visitors), which, at the outset, we consider is a major miscalculation for the following reasons. The Report notes that day visitor information was supplied by hotel management. We contend that there has been a fundamental error in the interpretation of this information by the Applicant's design team. The Applicant's consultants are reflecting the numbers provided as people. This is incorrect – the information provided by the hotel (and reiterated in consultations with the design team) clearly stated that the hotel peak parking demand is estimated at 506 spaces and not 506 visitors. This has led to an average vehicle occupancy being applied twice. As noted above, the Report states that the total hotel parking requirement is 374 spaces at peak, which we submit is an under provision of 132 spaces.

These inaccurate figures are repeated throughout the application documentation and have resulted in the calculation of an incorrect parking requirement that will not satisfy parking demand on what is a car-reliant rural site remote from public transport services. (Our Client had requested visibility of parking calculations prior to submission but these were not provided).

The Report further assumes a 96-space requirement for *'Waterfront Park and Public Amenities'* as proposed in this application, giving a total estimated parking requirement at Hodson Bay of 470 spaces. The Report concludes that there is a shortfall of approximately 117 parking spaces on site and proposes the provision of an additional 151 spaces to provide 504 spaces in total.

In our opinion, this will not comprise sufficient car parking to serve what is a greatly expanded waterpark proposal, a threefold increase in visitor numbers, an expanded marina and the existing hotel requirements, given that the site already operates with grossly insufficient parking provision.

As noted above, the current parking issues have largely arisen as a result of various extensions to the current water sports offering over the last number of years with no additional car parking provided at any point. The most significant extensions were in June 2016 and June 2023 (the use of land for marquees, coffee shop and extended slide park). In this context, the estimated parking demand noted in the application for non-hotel uses at Hodson Bay of 42 spaces is grossly understated, given the extensive expansion of the watersports facility in recent years.

In our opinion, the identified shortfall of 117 spaces is also significantly understated and fails to reflect the extent of current parking demand generated by the existing watersports use and vastly underestimates the extent of increased parking demand that the expanded waterpark facility will inevitably bring to the site. In this regard, Section 6.2 of the Report notes that, excluding the hotel, the marina and waterfront amenities (Baysports) will generate 382 vehicle trips per day (an increase of 216 estimated trips per day at present compared to the existing situation). However, only an additional 54 parking spaces are being proposed to meet this increased demand.

We also consider that the issue of construction parking is likely to have been underestimated. Section 5.1.1 of the Report estimates a peak construction workforce of approximately 25 personnel only estimated to generate 21 vehicles. It further states that these vehicle movements will be '*...distributed across typical start and finish times and not expected to coincide directly with peak visitor activity periods at Hodson Bay, which are primarily concentrated during afternoon and evening leisure periods*'.

A peak workforce of 25 construction personnel for a Project of this significance, complexity and duration (at least 30 months and likely longer) appears unrealistic in our opinion, as does the related worker car parking requirement. In our opinion, there is likely to be far greater construction parking demand arising here, which will need to be accommodated on site, thereby further reducing general parking availability during the 30-month period. We also do not accept that construction periods will not coincide with '*peak visitor activity*' in the context of the hotel operations where everything from early morning disturbance to overnight guests, those attending conferences/events throughout the week and leisure users throughout the day will inevitably be impacted during this stage.

Finally, in this regard, we note that the proposed parking layout (see Figure 5 of the Report) shows reduced car parking provision in the locations of greatest benefit to the hotel (Carpark A and on-street) from 171 spaces to 118 spaces, a net reduction of proximate hotel parking of 53 spaces. Whilst Carpark B in the vicinity of the hotel leisure centre will increase by 77 spaces, this is dependent on third party lands in the Golf Club's ownership and are at a remove from the hotel's primary entrance. By far the most significant increase in future parking occurs at Carpark C with an additional 127 spaces proposed. However, this car parking area is at a very significant remove from the hotel entrance and will not be used by hotel guests. It is considered, therefore, that the revised car parking arrangements are a net disimprovement in terms of accessibility and location in the context of hotel guests and day visitors.

In summary, the planning issue is not simply whether sufficient additional parking is identified within the overall proposal albeit this remains a serious concern. The central issue is whether it is appropriate to facilitate such a substantial increase in visitor-generating capacity where the parking, roadway and supporting infrastructure required to accommodate that increase is not guaranteed to be delivered and made operational in advance.

Construction Impact and Hotel Operations

Our Client has significant concerns regarding the potential impacts arising during the 30-month construction phase of the development, given its close proximity to an operational hotel, conference centre, leisure destination and public waterfront amenity. Hodson Bay Hotel will remain operational throughout the construction period. The waterfront is also likely to continue to be used by the local community and visitors during those works.

Hotel guests, conference delegates, wedding parties, leisure users, restaurant customers, waterfront users and local residents will, therefore, be exposed to:

- Construction traffic.
- Noise and vibration.
- Visual intrusion.
- Reduced parking availability.
- Construction compounds and hoarding.
- Material and plant storage.
- Generators and welfare facilities.
- Altered traffic and pedestrian circulation.
- Early morning construction activity.
- Temporary restrictions on access to parts of the waterfront.

Hotels and visitor destinations depend heavily on accessibility, convenience, amenity and the quality of the visitor experience. The proposed construction arrangements place each of these characteristics at risk over a prolonged period.

A thirty-month construction programme would extend across three consecutive tourism seasons. The potential effects on accessibility, visitor perception, customer satisfaction, advance bookings, conference business and the wider enjoyment of the waterfront require detailed and enforceable mitigation.

The Construction Management Plan must, therefore, address the continued operation of the Hotel and the continued safe and convenient use of the waterfront by the public in a realistic and enforceable manner. It should not be confined to conventional construction/site management matters.

It is similarly not considered that these concerns should be dealt with by standard post-planning/pre-commencement conditions, which have no public scrutiny and will be managed by the Planning Authority (also the Applicant in this case). All relevant construction related impacts must be fully addressed during the planning process and the Hotel, as the adjoining land use most severely affected by the close-quarters nature of this Project, must be afforded specific consideration.

Other construction stage concerns include:

- Noise and Vibration: Section 11.4.3.3 of the EIAR states '*Noise impacts attributable to the combined works are assessed in Appendix 11-4. Impacts will be imperceptible or not significant at most receptors, increasing to slight adverse at the hotel. As before, the temporary duration of these impacts, and the likelihood that hotel bedrooms will be generally vacant during construction times, will mitigate these impacts, and it is again considered that the residual impact will be not significant at the hotel*'. We wish to query the statement regarding bedroom vacancy during construction times noted above, which is incorrect and seek clarity as to where this assumption was derived from.

- Under Section 11.4.3.5 of the EIAR, it states '*Carpark works will arise within 50 m of the hotel. To ensure than* (sic) *cosmetic or structural damage does not arise at the hotel, it will be prudent to undertake real time vibration monitoring while vibro-rolling (if required) is undertaken. It is also considered prudent to extend the assessment distance to 100 m i.e. real time monitoring is recommended at the hotel and at any other structure where vibro-rolling is carried out within 100 m. This is included as a mitigation measure below*'. It further states '*Vibration may become perceptible at the hotel during nearby vibro-rolling, resulting in a not significant adverse impact. The impact is likely to be brief, lasting less than one day each time rolling is required. While PPV levels at the hotel are unlikely to approach damage thresholds during vibro-rolling, real time monitoring is recommended to ensure levels remain low*'.

- In the context of a busy hotel, which will be remain fully operational during the entire construction process, the above impacts are not considered acceptable in this context, and we would request alternative methodologies be considered to eliminate same.

- As noted above, the phasing of development is contingent on the availability of funding, which may impact on the later phases being commenced and completed, notably including car parking, site roads, public realm and landscaping (Year 3, Q1-4). By way of contrast, the proposed Water Sports Pavilion and Marina Extension are proposed for commencement in Year 2, Q1 and Year 2, Q3 respectively. This leaves the significant risk that completion of the car parking provision and public realm/landscaping (all vital to the Hotel) will be at risk in later phases, thereby seriously affecting the attractiveness of the hotel as a guest destination and as a venue for conferencing and events.

Location of Construction Compounds

The proposal includes the siting of construction compounds and associated facilities immediately adjacent to Hotel operations and within a substantial section of the existing parking areas.

This arrangement is inappropriate, given the existing parking constraints, the shared nature of the parking resource and the requirement for the Hotel and waterfront amenity to remain operational during construction.

Locating construction compounds in these areas would:

- Remove or restrict spaces from an already constrained parking supply.
- Further reduce public access to the waterfront.
- Introduce contractor and construction traffic into the Hotel and visitor environment.
- Generate noise from plant, generators and early morning activity.
- Require welfare and storage facilities adjacent to guest and public areas.
- Create additional visual intrusion.
- Interfere with hotel, conference, leisure and public waterfront activities.
- Diminish the overall visitor experience.

The Hotel considers that suitable alternative locations are available along Hodson Bay Road, where there is space capable of accommodating:

- Contractor parking.
- Construction compounds.
- Welfare facilities.
- Generators.
- Plant and equipment storage.
- Material storage and laydown areas.

The use of appropriately located remote compounds would reduce impacts on Hotel operations, preserve existing parking capacity and better protect public access to the waterfront, while still facilitating the construction of the proposed development.

The Applicant should, therefore, be required to demonstrate that all reasonable alternatives to the proposed compound locations have been considered. Construction compounds and related facilities should not be permitted within operational Hotel parking areas or in locations that would materially interfere with Hotel operations or public access to the waterfront.

Requirement for Appropriate Sequencing/Phasing

The most effective means of addressing the infrastructure concerns is through a clear and enforceable sequencing/phasing requirement.

If the Commission is minded to grant permission for this Project, the commencement of the construction of visitor-generating elements should be expressly linked to the prior completion of the infrastructure necessary to accommodate the additional demand.

In particular, the construction of the following elements of the Project should not commence in advance of the permanent supporting infrastructure:

- The Watersports Pavilion.
- The proposed café.
- The proposed marina extension.
- Associated new visitor facilities.
- Any other element that would materially increase visitor or parking demand.

All approved permanent parking facilities, roadway improvements, traffic-management measures and associated public realm infrastructure should first be completed, made available for public use and be fully operational.

This is a reasonable and proportionate requirement.

It reflects the sequencing requested by the Hotel during the pre-planning consultation process and provides the most reliable means of ensuring that visitor-generating development does not proceed ahead of the infrastructure required to support it.

As a result of the uncertainty relating to funding of the roads and carparking work, a condition requiring infrastructure to be completed only before the facilities open would not adequately protect existing users. The Commission must consider whether the relevant infrastructure should be completed, before those works commence, rather than merely before the facilities become operational.

The condition should be drafted with sufficient precision to specify:

- The infrastructure to be completed.
- The relevant phase or phases of development.
- The point at which the infrastructure must be operational.
- The arrangements for maintaining public and Hotel access.
- The party responsible for certifying completion.

- The requirement that the completed infrastructure remain available throughout subsequent construction phases.

Suggested Planning Conditions

If the Commission is minded to grant permission, the Hotel respectfully requests the attachment of conditions addressing the following matters.

Condition 1: Infrastructure Sequencing

No works shall commence on the Watersports Pavilion, marina extension, café or any other visitor-generating element of the development until all permanent parking facilities, roadway improvements, traffic-management measures and associated infrastructure approved as part of the development have been completed, made available for public use and are fully operational.

Alternatively, if the Commission considers that the construction of any such element may proceed before completion of the infrastructure, no visitor-generating facility shall be opened or brought into operation until the supporting infrastructure has been completed and the Commission is satisfied that sufficient parking and access capacity will remain available throughout the construction period.

Condition 2: Construction Compounds

All construction compounds, contractor parking, welfare facilities, generators, material storage areas, plant storage and construction laydown areas shall be located at appropriately assessed locations remote from Hotel operations, operational parking areas and principal public access points to the waterfront.

No construction compound or related facility shall be located within Hotel parking areas or on lands where it would materially reduce parking capacity, interfere with Hotel operations or restrict public access to the waterfront amenity.

Condition 3: Construction and Access Management Plan

Prior to commencement, a detailed Construction and Access Management Plan shall be submitted to and agreed in writing with the planning authority.

The plan shall specifically address:

- Protection of Hotel operations.
- Maintenance of guest and service access.
- Maintenance of safe public access to the waterfront.
- Conference, wedding and event activity.
- Parking availability during each construction phase.
- Contractor and construction traffic.

- Pedestrian and vehicle circulation.
- Noise and vibration control.
- Working hours.
- Visual screening.
- Material deliveries and storage.
- Emergency access.
- Communication with the Hotel, local residents and waterfront users.
- Measures to avoid conflicts during periods of peak tourism, Hotel and recreational demand.

Condition 4: Public Realm and Mitigation Works

All landscaping, public realm improvements, traffic-management measures, pedestrian connections and other mitigation works necessary to protect Hotel operations and public use of the waterfront shall be completed before the relevant visitor-generating facilities are opened or brought into use.

Condition 5: Construction Parking

All contractor and construction-worker parking shall be provided within designated off-site or remote parking areas. Construction personnel shall not use Hotel parking spaces, public waterfront parking spaces or other spaces required to maintain existing operations and public access.

Condition 6: Monitoring and Liaison

A construction liaison arrangement shall be established before commencement and maintained throughout the construction period. It shall include nominated representatives of the Applicant, the principal contractor, Hodson Bay Hotel and other relevant stakeholders.

The purpose of this arrangement shall be to monitor access, parking, noise, traffic circulation and operational impacts, and to provide a mechanism for the timely resolution of construction-related difficulties.

Conclusion

Hodson Bay Hotel supports the overall objective of enhancing tourism and recreational facilities at Hodson Bay and welcomes appropriate investment in marina infrastructure, waterfront improvements and public amenities.

However, the application as presently proposed gives rise to serious planning concerns regarding transport capacity, accessibility, parking provision, construction impacts, development phasing and the absence of sufficient certainty regarding the funding, timing and delivery of critical supporting infrastructure.

The application seeks to facilitate an increase in annual watersports visitors from approximately 55,000 to approximately 164,000, notwithstanding the acknowledged pressure on existing parking facilities. The proposed additional parking is not considered sufficient to meet the likely increased demand.

The Hodson Bay Hotel is an exceptionally successful and busy tourism destination all year-round hosting national conferences as well as numerous international events. It is also extremely successful in the national and international tourism and leisure sector and, because of this combination, rooms enjoy a high average annual occupancy (80%). Of the total revenue generated by the Hodson Bay Hotel, 46% comes from bedrooms and 54% from ground floor activity. In addition to the 176 bedrooms, the hotel has extensive conference and banqueting facilities catering for up to 1,200 daily delegates. There are three large restaurants, two bars and a leisure centre with a large gym and a spa.

Moreover, due to the relationship forged over the years, the hotel has become the centre of a thriving local community. Hodson Bay Hotel employs approximately 335 people and contributes approximately €16.14 million annually in direct and indirect economic value to the local and regional economy. Prolonged disruption to its accessibility, operation, reputation or visitor experience could affect employment, conference business, tourism expenditure and economic activity across the wider region, together with long term reputational damage to the location and Hotel business.

It is submitted, therefore, that the concerns of the Hotel and its operations is deserving of the utmost consideration in the assessment of this proposal, given its unique location immediately adjoining the site and as a highly sensitive land use that will be potentially significant adversely affected during the construction stage. Hotels succeed based on an attractive setting and good accessibility – both characteristics are at significant risk with this Project, and this proposal could, if not managed correctly, undermine the long-term viability of the hotel.

It should be noted that in order to facilitate the various hotel improvements undertaken over the years, every single car parking space at Hodson Bay was either built, or financed by, the hotel. In 2004, there was serious traffic congestion during busy periods, and, in response, the Hotel developed the existing public car park to the north of the watersports facility. Roscommon County Council did not provide any additional car parking spaces when the watersports facility was originally developed, nor for the recent major extensions to the watersports use, as noted above.

As described above, we also have significant concerns in relation to the quantum of car parking proposed in this application, together with the location and delivery of the additional spaces proposed. The hotel conference and leisure business, in particular, generate substantial car parking demand and without adequate car parking spaces reasonably adjacent to the Hotel entrance, the Hotel will simply lose a large percentage of this business.

In our view, the car parking provision for the site as currently proposed will not meet the needs of the existing Hotel or the proposed development and requires further consideration.

Notwithstanding this, should permission be granted, the phased arrangement for the development must be revised to ensure that car parking, internal roads and public realm are not confined to the final phases of the Project as currently envisaged and must be completed, prior to the occupation and commencement of operations of the proposed Water Sport Pavilion and extended marina. We would request that this requirement must be enshrined in any future planning consent by way of appropriately worded planning conditions.

The protection of an established tourism asset, the safeguarding of substantial local employment, the continued accessibility of an important public amenity and the provision of adequate infrastructure for existing and future users are complementary objectives of proper planning and sustainable development.

Accordingly, the Commission is requested to require the following be enshrined in any future consent:

1. Completion and operation of all necessary parking, roadway, traffic-management and associated supporting infrastructure before the commencement or operation, as appropriate, of the proposed Watersports Pavilion, marina extension, café and other visitor-generating elements.

2. Re-location of all construction compounds, contractor facilities, plant and material storage to suitable locations remote from Hotel operations, operational parking areas and principal public access points.

3. Preparation and implementation of a comprehensive Construction and Access Management Plan protecting Hotel operations, public access and continued use of the waterfront.

4. Completion of all necessary public realm, parking and traffic mitigation before the relevant proposed facilities are opened or brought into operation.

5. Maintenance of adequate parking and safe access for Hotel users, the local community and waterfront visitors throughout all construction phases.

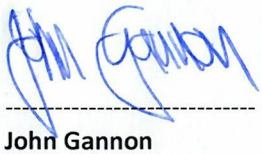
If the Commission is not satisfied that the required infrastructure, sequencing and mitigation can be secured with sufficient certainty through precise and enforceable conditions, the visitor-generating elements of the proposed development should be refused.

Without these safeguards, the proposal would present an unacceptable risk to a major regional employer, approximately 335 jobs, an enterprise generating more than €16 million annually in local and regional economic value, and an important public waterfront amenity widely used and valued by the local community and visitors.

We also wish to reiterate our concerns in relation to the issue of land ownership and consent and also the potentially very significant adverse amenity impacts on the hotel operations during the construction phase. These are noted above and we consider have not been adequately addressed or mitigated in the planning submission. In the event that the Commission seek Further Information in relation to the above, we would welcome the opportunity to review the Applicant response and make further observations as necessary.

We trust that the above will be taken into consideration in your assessment and we look forward to written acknowledgement of receipt in due course.

Signed



John Gannon
Managing Director
Tom Phillips + Associates