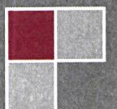


2023

Proposed Integrated Tourism/ Leisure/Recreational (ITLR) development at lands located at Magheramore, Co. Wicklow

Planning Report

Planning Report to accompany Planning Application lodged with Wicklow County Council for an Integrated Tourism/Leisure/Recreational development at Magheramore, Co. Wicklow



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1 Introduction

This planning report has been prepared by Manahan Planners, 38 Dawson Street, Dublin 2, to accompany a planning application by Creatively Pacific Limited, seeking Planning Permission for new Integrated Tourism/Leisure/Recreational (ITLR) development on a 2.966ha site located at Magheramore, Co. Wicklow.



Figure 1: Site Location Map in the context of Wicklow County

The proposed Integrated Tourism/Leisure/Recreational (ITLR) development comprises of new contemporary style 2 storey over lower ground level building containing a restaurant, function room, cinema, gym, sauna and outdoor swimming pool. Accommodation will be provided in the form of 48 no. single storey accommodation pods located on the headland overlooking Magheramore beach and cliffs, which the applicant has ownership of.

A new single storey structure is proposed to be constructed at the north of the site to contain a surfing facility, which is currently being run from a storage container on the beach. The new structure will also contain changing, showers and WC facilities as well as first aid equipment. It is anticipated that the upgrade of the existing surf facility will be a welcome addition to the beach area here. Car and bicycle parking to serve the development are also proposed.

The professional team involved in designing the proposed development includes:

- **Lawrence and Long Architects**–Architect
- **Digby Brady Consultant Landscape Architects**–Landscaping
- **Barrett Mahony Structural and Civil Engineers**-responsible for drainage, flood risk assessment, roads access and building structural strategy.
- **AGL Geotechnical Engineers** - Responsible for the preparation of the Site Assessment Report,
- **Apex Geophysics** – Geophysical Assessment (recharge area) and geophysical ground survey,
- **AWN Consulting** – Hydrogeological and Geophysical Assessment
- **Denyer Ecology** – Petrifying Spring Survey and Assessment
- **Enviroguide Consulting** - Appropriate Assessment, Natura Impact Statement and Ecological Impact Assessment.
- **Jim Power Economics** – Economic and Financial Evaluation Report
- **Manahan Planners** – Planning Consultants

The information and details provided with this application has shown that there is a social and economic need to locate in this area, close to the tourism product that it is based around. The proposed development is a contemporary high quality integrated tourism leisure and accommodation facility that has been thoroughly considered by the applicants design team listed above, which also included Pre- Application Consultation undertaken with Wicklow County Council on 17th November 2021, as well as subsequent communications with the various Wicklow County Council Departments as to their requirements in relation to the proposed ITLR development.

An Operations Report, prepared by Creatively Pacific is enclosed as Appendix A of this Planning Report.

A Natura Impact Statement has been carried out in relation to the proposed development as is accompanied with this planning application.

2 Site Context

The 2.966ha site is located on the east coast, on a headland overlooking Magheramore Beach. The site is accessed via a single lane track of approximately 500m in length, off the Regional Road R750. The site consists of mostly grassland and an area of hardcore at the north of the site which was used for ad hoc parking.



Figure 2: Aerial photo with indicative outline of the subject site in red, and indicative site ownership in blue.



Figure 3: Aerial photo of the subject site, outlined in red. Area used for parking indicated in orange

3 The Proposed Development

The Statutory Notices read as follows:

Wicklow County Council- *Creatively Pacific Limited, are seeking Planning Permission for development on a 2.966ha site located at Magheramore, Co. Wicklow.*

The proposed development will consist of a new Integrated Tourism/Leisure / Recreational (ITLR) complex comprising firstly, of a new two storey over lower ground level building; containing gym, sauna, cinema and outdoor pool (24m x 10m) at lower ground level, reception, bar and restaurant, washrooms and outdoor terrace at ground floor and event room at first floor, and secondly, it is proposed to install 48 no. accommodation pods (21sq.m each) along the east of the site. It is proposed to construct a dedicated structure (92 sq.m), located at the north end of the site adjacent the beach access, containing a surf school facility, public W.C and public showers. 49 no. car parking spaces, including 3 no. universal accessible spaces and set down area and 13 no. bike parking spaces are proposed to serve the ITLR facility. The existing pedestrian access from R750 will be widened to facilitate vehicular access and shall be barrier controlled. The proposal includes all associated site works, excavation, engineering services, SUDS, landscaping, fencing, bin stores and road works. Enhancement and supplementation of existing planting is proposed along south and west boundaries to protect the existing ecology. Existing Public pedestrian access to the beach will remain unaffected. A Natura Impact Statement is included with this planning application.

The proposed development is described as an Integrated Tourism/Leisure/Recreational (ITLR) development comprising of new contemporary style building (3,572 sq.m) arranged over 3 floor levels - containing a bar, restaurant, function room, cinema, gym, sauna and outdoor swimming pool. Accommodation will be provided in the form of 48 no. accommodation pods strategically located on the headland overlooking Magheramore beach and cliffs, which the applicant has ownership of. (See lands within blue line in Figure 4 below).

A new structure is proposed to be constructed at the north of the site to contain a surf school facility, which is currently being run from a shipping container on the beach. The discreet single storey structure will also contain storage, public W.C. and public showers. A new 49 bay car parking area is proposed at the north of the site to provide for the guests staying at the accommodation lodges.

The proposed development seeks to combine all elements of the tourist experience including, the hook (i.e. beach and landscape), ancillary services including food and beverage and accommodation, improving the accessibility for tourists to visit and experience this scenic and high amenity area, while protecting and enhancing the landscape, ecology and biodiversity for which this ITLR's tourist attraction is dependent on. A Natura Impact Statement is enclosed with this planning application.



Figure 4: Site Layout Plan

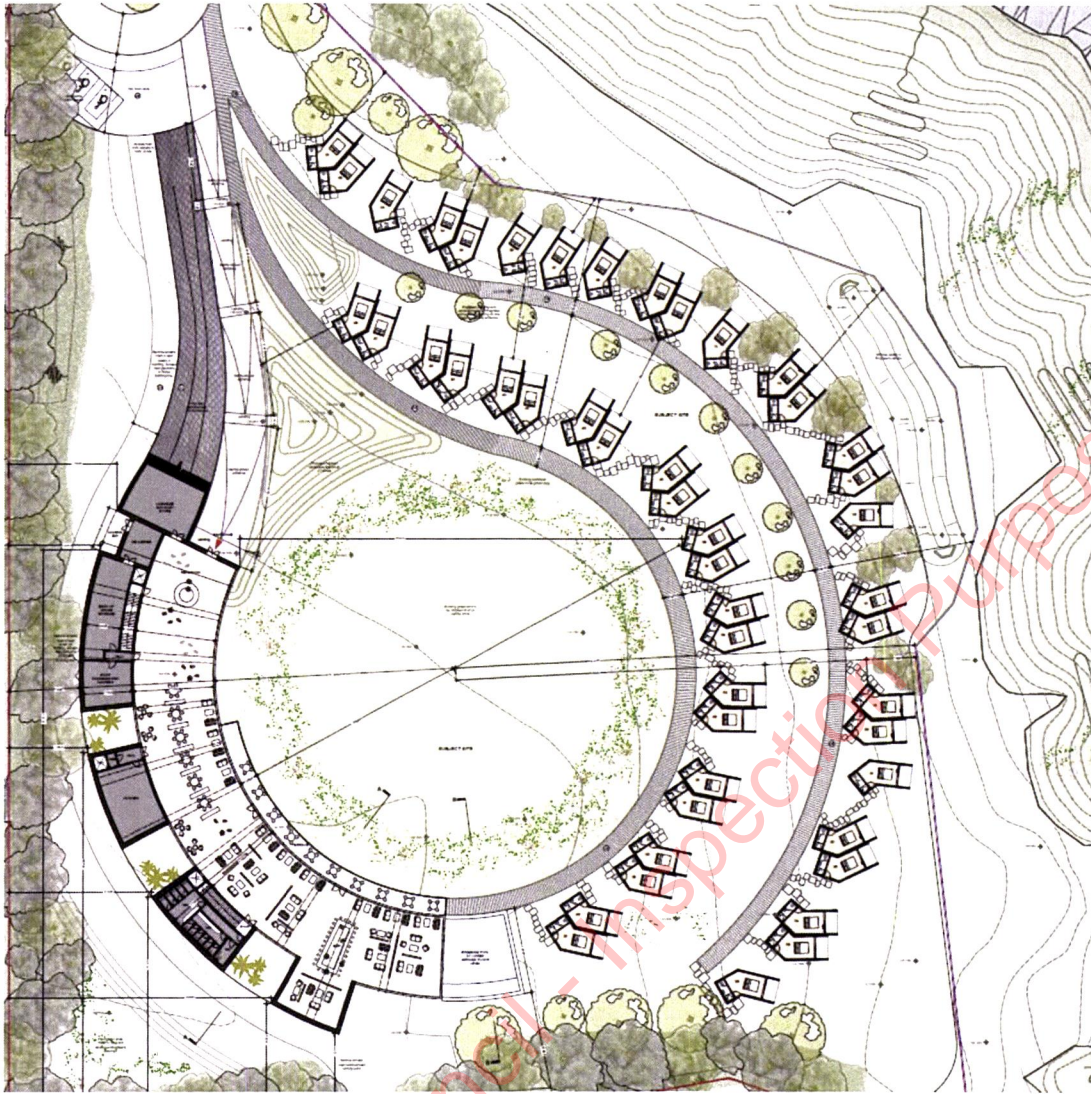


Figure 5: Ground Floor Layout Plan, main building and accommodation pods



Figure 6: Model of proposed development view from sea (east)

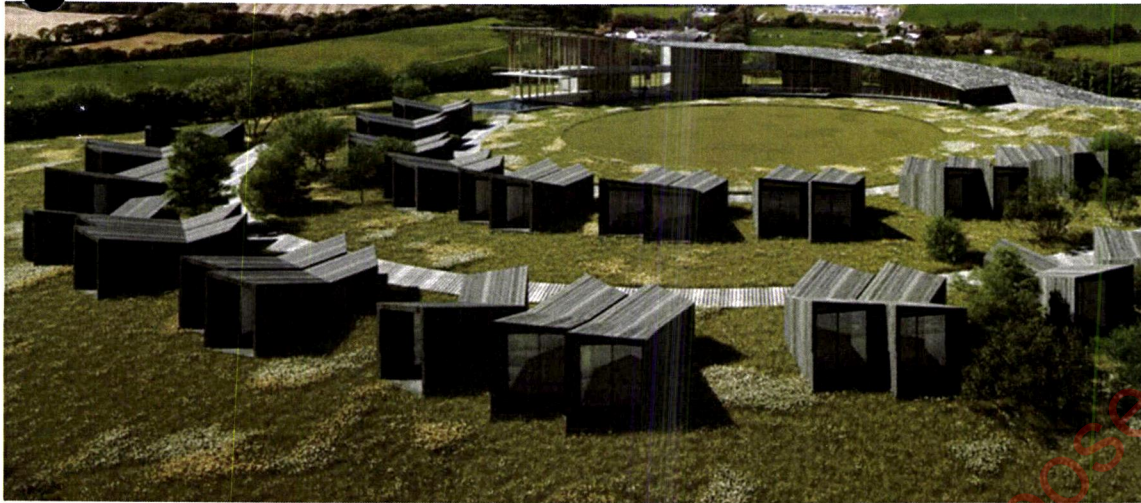


Figure 7: CGI model of proposed accommodation pods



Figure 8: CGI view from the proposed main building

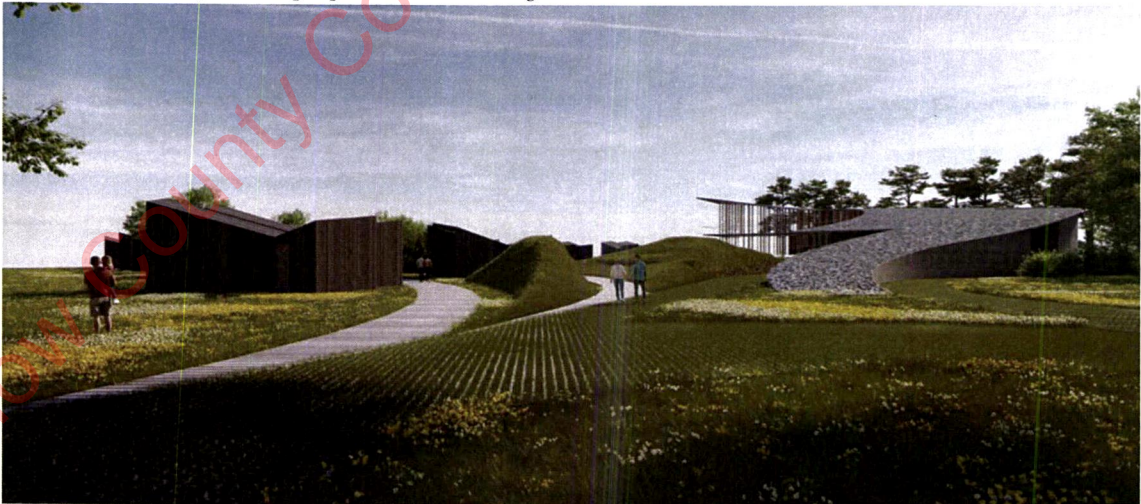


Figure 9: CGI view from the north towards the main building and accommodation pods

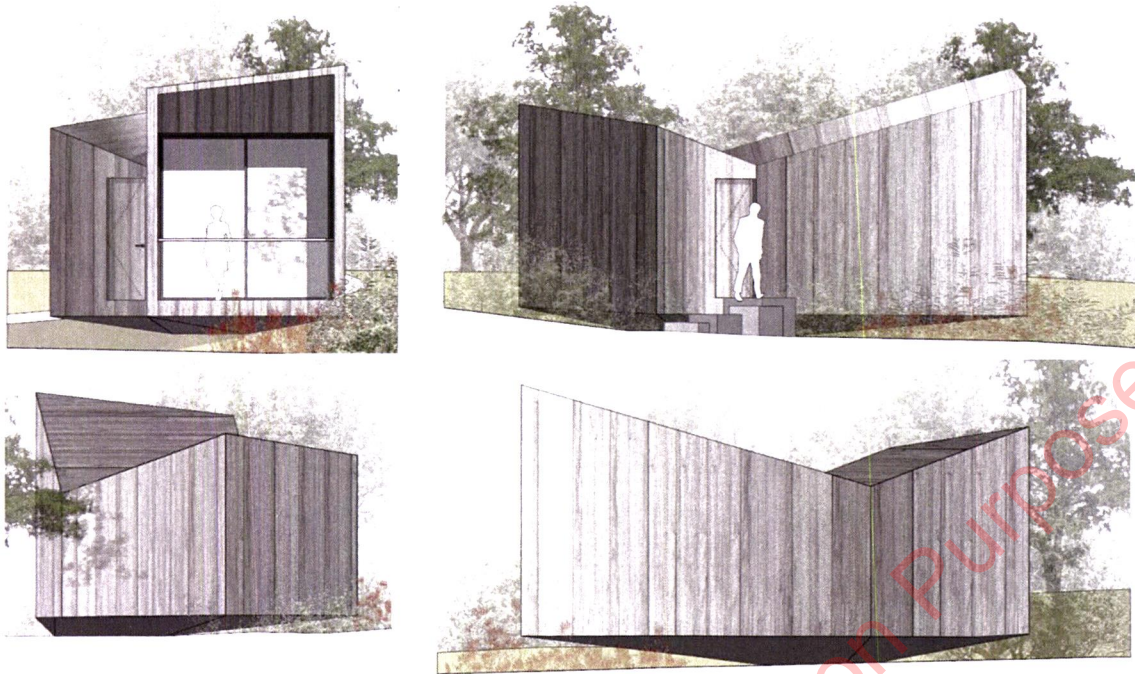


Figure 10: Elevations drawing of accommodation pod

GUEST POD DETAILS

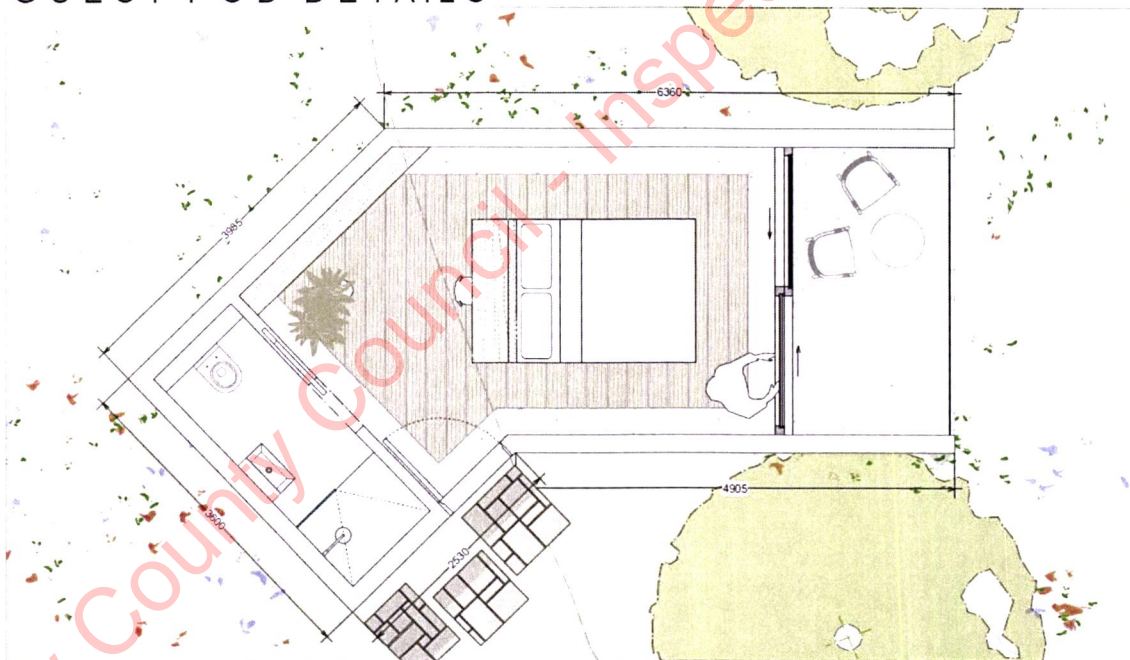


Figure 11: Layout Plan drawing of accommodation pod

The single level accommodation pods are c.21 sq.m, double occupancy and contain private bathroom. The pods will be clad in native Larch boarding finished in a dark stain. The Larch boarding will extend over the roof. The timber finish will merge well into the existing and new trees proposed along the eastern boundary of the site as viewed from within the site and from Magheramore beach and the sea beyond.

The existing landscaping will be supplemented with native planting and boundaries enhanced to protect the existing ecology.

At present there is public access to the site off the R750 road along Nun's Lane for pedestrians. This laneway provides access to the beach which is to be maintained so that public access to the beach remains unaffected. There is a vehicular gate way at the top of the lane which is only accessed by local residents and operatives accessing the farm land that forms part of the site. Vehicular access is not presently provided for the public. The intent of this proposed project is to maintain the same access arrangement –Public pedestrian access to beach continuing with future guests to the hotel to be allowed access by car.

It is intended to upgrade the laneway down to the beach. It is proposed to maintain the public pedestrian access along this laneway to the beach and to the proposed surf facility. The upgrade of the laneway will take the form of widening it, lighting it and providing a new permeable surface. See lodged drawing Ref. MAG-LLA-ZZ-ZZ-DG-A-PP17.

Car parking is to be provided on site for guests of the new Integrated Tourism/Leisure/Recreational (ITLR) development. Vehicular access to it will be by way of the Nun's Laneway. It is intended that there will be a barrier installed at the top of the laneway that will be monitored via camera and intercom by staff within the ITLR development to allow vehicular access only to those staying at the ITLR development. The surface of the car park will be permeable.

At present there is a surf school operating out of a shipping container on the beach. It is proposed to create a permanent facility that will enable the operators to improve their offering. This is to be located alongside the car park for guests at the facility. See lodged drawing Ref. MAG-LLA-ZZ-ZZ-DG-A-PP18. It is intended to provide a surf school/shop facility with changing areas and first aid equipment. It is anticipated that the upgrade of the existing surf facility will be a welcome addition to the beach area here.

The provision of upgraded school and shop facilities with changing, shower and WC facilities will greatly improve the use and experience of surfing at this location.

4 Planning History

There are a series of planning applications on the subject site made by Mr. Niall Mellon for a proposed dwelling.

Reg. Ref. 97/7321 (ABP Ref. 106048)

Registered: 09/12/1997 REFUSED: 02/06/1999

The proposed development was for a part single store part two storey dwelling and septic tank. Wicklow County Council granted permission but the decision was overturned by An Bord Pleanala and permission was refused.

There were 3 no. planning applications made subsequently by Mr. Niall Mellon for revised designs for a dwelling, however each one were withdrawn before being decided. (**Reg. Ref. 99/1148, Reg. Ref. 99/1643 and Reg. Ref. 01/4818**).

Reg. Ref. 14/1160

Registered: 27/02/2014 REFUSED: 17/04/2014

The proposed development was for:

“An integrated tourism and recreational development consisting of a partially buried lodge building (8 no. bedrooms with ancillary restaurant and guest facilities); upgrading of existing access road and carpark, provision of a public facilities building; access road and carpark, access road to lodge building, on site bicycle system SUDS drainage, landscaping and all associated ancillary works necessary to facilitate the development.”

Wicklow County Council refused permission for 3 no. reasons which mostly relate to insufficient information relating to appropriate assessment, environmental impact, site suitability reports and wastewater treatment.

Reg. Ref. 22/763

Registered: 08/07/2022 WITHDRAWN

It is noted that in a neighbouring property, there was a recent planning application for permission (Reg. Ref. 22/763) for:

“Installation of ten timber clad glamping pods and all associated services. These services include a utility pod, wastewater treatment system, roof-mounted photovoltaic array, car parking spaces, connecting footpaths and new hedge row planting. The development is to utilise the existing site access and car parking spaces are located in the field adjacent to the R750.”

A Planners Report has been published in relation to the proposed development which recommends 4 no. reasons to refuse planning permission mostly relating to contravention of tourism strategy objectives, insufficient information in relation to wastewater, EIA Directives and traffic impacts.

5 Policy Context

The Wicklow County Development Plan 2022-2028 is consistent with higher order strategic policy documents including the National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES), the National Climate Action Plan and the NTA's Transportation Strategy for the Greater Dublin Area 2016-2035.

This section of the Planning Report lists the relevant Wicklow County planning policy and development management guidance that informs the proposed development described in this planning application. An assessment of the proposed development against the relevant policies is contained in Section 6 of this Planning Report.

Wicklow County Council Development Plan 2022-2028

Policy/objective/development management	Comment
<p><u><i>Vision for the County</i></u></p> <p><i>To guide and facilitate the sustainable growth of the County in a manner which supports a deep respect for its unique natural heritage, capitalises on the potential of our towns and villages to deliver compact growth, facilitates healthy placemaking, supports the creation of self-sustaining settlements and rural areas that are attractive places to live in, work in and visit, provides for new job opportunities, embraces climate action and enables the transition to a low carbon, climate resilient and environmentally sustainable economy, improves sustainable mobility and conserves our heritage.</i></p>	<p>Tourism is a significant economic driver and is considered a key growth sector of the Irish economy. It supports job creation across a diverse range of sectors and skill levels. The potential contribution to employment of tourism is recognised and encouraged in the County Development Plan, as is the need to protect and enhance the natural and built environments, which are central to the promotion of tourism in the County.</p> <p>Magheramore beach is a popular place to visit for the locals and tourists from afar and should be considered a development cluster in its own right.</p> <p>It is considered that the proposed development is in accordance with the vision for the County.</p>

Policy/objective/development management	Comment
<p><u><i>Strategic Outcome SCO9 - Tourism</i></u></p> <p><i>“Capitalise on Wicklow's location within Ireland's Ancient East and facilitate a year round tourism industry that harnesses Wicklow's natural amenities and vast recreational opportunities.</i></p>	

<p>Ensure that tourism development respects and protects the very assets it depends upon.”</p> <p>Tourism and recreation make a positive contribution to the economic and social wellbeing of County Wicklow. In 2016, there were 272,000 overseas visitors to Wicklow who spent €86 million. There were 329,000 domestic visitors who spent €71 million. This represents 33% of the domestic nights spent in the East and Midlands region and 4% of the total nights in Ireland, which compares well with Wicklow’s 23% (regional) and 3% (national) share of the bed stock.</p> <p>The County’s tourism and recreational attractions are important assets, which form the basis of the County’s tourism industry and which are fundamental to the enjoyment of the County by both visitors and residents. Attractions range from areas of scenic beauty, which provide attractive natural bases for outdoor pursuits, such as the Wicklow Mountains, which comprise mountain peaks, valleys, rivers and lakes, the coastline with long stretches of sandy beaches and dunes and the numerous woodlands. The County has a rich heritage of archaeological and historical sites, manor homes and gardens, and attractive towns and villages. In addition, there are a number of golf and resort hotels, and adventure centres, which are within driving distance of Dublin that are attracting increasing numbers of visitors and business related events.</p>	<p>The proposed development, consisting of new Integrated Tourism / Leisure / Recreational (ITLR) complex including 48 no. accommodation pods, located in proximity to the scenic Magheramore beach.</p> <p>The applicant has appointed a team of experts in their respective fields to ensure that the proposed tourism development respects and protects the amenity of Magheramore beach and the surrounding area.</p> <p>It is considered that the proposed development is in accordance with the Strategic Outcome SCO9 - Tourism.</p>
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Policy/objective/development management	Comment
<p>The rural area in Wicklow is an active and vibrant area that plays host to a range of activities including, for example, rural housing, rural recreational activities, agricultural, horticulture, forestry, aquaculture, fishing, rural tourism, rural enterprises, quarrying and extraction, landfill, renewable energy etc.</p> <p>The key development parameter in the rural area is to facilitate appropriate and necessary activities and development, but to protect the natural environment within which these activities are undertaken. Protecting the natural environment is essential for</p>	<p>The site is located in a rural area.</p> <p>It is considered that the proposed development will facilitate a vibrant rural tourism offering and will employ c.160 people throughout the year.</p> <p>The applicant has appointed a team of experts in their respective fields to ensure that the proposed tourism development respects,</p>

<p><i>the maintenance and protection of ecological biodiversity and landscape quality, as well as meeting climate change and green infrastructure aspirations. In order to safeguard the future viability of rural activities and to ensure that the rural area flourishes, it is essential that the development of the rural area is managed in a sustainable manner into the future. It is necessary to support and protect the rural area and ensure the appropriate management of rural uses including rural housing, key rural services, agricultural activities, use of aggregate resources, green and alternative businesses, rural transport, rural tourism and rural entrepreneurship.</i></p> <p><i>Development within the rural area should be strictly limited to proposals where it is proven that there is a social or economic need to locate in the area. Protection of the environmental and ecological quality of the rural area is of paramount important and as such particular attention should be focused on ensuring that the scenic value, heritage value and/or environmental / ecological / conservation quality of the area is protected.</i></p>	<p>protects and enhances the ecological biodiversity, landscape quality and amenity of Magheramore beach and the surrounding area.</p> <p>An Economic and Financial Analysis has been prepared for the proposed development and is included as part of this planning application.</p>
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Policy/objective/development management	Comment
<p><i>Section 9.6 of the County Development Plan sets out the Objectives for Wicklow’s Rural Economy. The Strategic Objective is:</i></p> <p><i>“To preserve the amenity, character and scenic value of rural areas, and to generally require employment-generating development to locate on zoned / designated land within existing settlements. Notwithstanding this, it is the objective of the Council to enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services including those addressing climate change and sustainability and through the development of appropriate rural based enterprises, which are not detrimental to the character, amenity, scenic value, heritage value and environmental quality of a rural area.”</i></p>	<p>The County’s rich heritage and wealth of natural amenities are significant assets and need to be managed in a sustainable manner. There are significant opportunities to capitalize on the potential of these assets, grow tourism and enhance the development of outdoor pursuits in a manner that respects and protects the intrinsic character of the County.</p> <p>The proposed new ITLR facility at Magheramore beach is not located within designated lands within existing settlements. The nearest development cluster is located at Blainroe, which is an area of static caravans/mobile homes for tourist accommodation.</p> <p>It is considered that the proposed ITLR and associated tourist accommodation is not compatible with the existing cluster at Blainroe.</p>

Policy/objective/development management	Comment
<p><u>Accommodation–</u></p> <p><i>It is important to facilitate an adequate range of tourist accommodation options including hotels, self-catering, camping, glamping etc that will facilitate increasing the amount of overnight visitors to the county. All tourist accommodation should be primarily directed into existing settlements where existing services can be availed of and where the development will support the vibrancy of those settlements. All tourist development should be of a scale that the settlements can sustain.</i></p> <p><i>The Planning Authority will carefully manage the development of accommodation in the rural area to ensure that the role of settlements as tourist hubs would not be undermined. Exceptions to this include farm diversification proposals or tourist accommodation provided in association with the restoration of a historic structure including protected structures.</i></p> <p><i>It is important that all applications for tourist accommodation are of a high standard of design and do not unduly detract from the character of the landscape or settlement in which they are situated.</i></p>	<p>The County Wicklow Accommodation Working Group had commissioned Colliers International to carry out a high level review of current visitor accommodation in the County and the accommodation elements of the Tourism Strategy and Marketing Plan & the Fáilte Ireland Accommodation Investment Toolkit. The Accommodation Study Report seeks to review the current situation in Wicklow and to make recommendations around the development of new accommodation. Some commentary, views and recommendations contained within that report are extracted below.</p> <p>“The County needs a more targeted approach to attract new forms of accommodation, including mixed use schemes, outdoors & hybrid accommodation (pods, glamping, cabins, adventure parks).</p> <p>Almost 94 of Wicklow hotel accommodation (1400 bedrooms) is at a 3, 4, 5 star level, which is in the higher price bracket in terms of average room rate.</p> <p>Wicklow County needs more accommodation but only in specific demand areas.</p> <p>Local tourism offering must combine all elements of the tourist experience including hook or main attractors (the attraction), ancillary services including Food and Beverage and Accommodation.</p> <p>Review the open for consideration elements to ensure appropriate range of development options are available (e.g. Hybrid accommodation).</p> <p>Consideration could be given to maintaining and enhancing, wherever possible, the positive supports for tourism accommodation in the County Development Plan and to encouraging alternative and hybrid forms without specifying or precluding specific types of accommodation.”</p>

	It is submitted that there is no similar development in County Wicklow at the moment and would not undermine the existing tourist hubs and settlements.
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Policy/objective/development management	Comment
<p><i>Tourism Strategic Objectives include:</i></p> <ul style="list-style-type: none"> <i>To facilitate the expansion of existing and the development new tourism and recreation related development, in line with the principles for sustainable tourism set out to follow;</i> <i>To facilitate Fáilte Ireland and Wicklow County Tourism initiatives for the development of tourism in the County;</i> <i>To protect Wicklow's principal strengths and capitalise on the distinct tourism and recreational attractions that are on offer – scenic beauty, woodlands and waterways, coastal areas and beaches, and built and natural heritage;</i> <i>To preserve the character and distinctiveness of scenic landscapes as described in the Landscape Categories of the County set out in Chapter 17;</i> <i>To ensure a focus on high quality tourism and recreation facilities that are of benefit to visitors and the community alike.</i> 	<p>It is submitted that the proposed development will provide a high quality, sustainable tourism and recreation facility, which is sensitive to the character and distinctiveness of Magheramore beach.</p> <p>It is considered that the proposal is in accordance with Wicklow County tourism initiatives and Failte Ireland tourism strategy. The development has been designed to specifically serve as a tourist facility that can be utilised all year round.</p> <p>Detailed environmental, ecological and design studies have been conducted in relation to the proposal and it is submitted that the applicant has comprehensively addressed the Tourism Strategic Objectives to deliver an economic, environmental and socially sustainable development.</p> <p>It is evident that the proposed development has been carefully and strategically designed to capture all that the scenic location has to offer without unduly detracting from the character of the landscape. The scenic landscape that the proposed development is surrounded by is a vital part of the design in itself.</p> <p>It was imperative to the applicant that the community benefit from this development just as much as the tourism industry. For this reason, the development includes a complete enhancement of the current access pathway to the beach, a cleaner & safer beach, as well as innovative surf facilities to replace the old shipping container currently in use at the beach and the addition of vital facilities including, WC, Showers and a defibrillator.</p>

Policy/objective/development management	Comment
<p><u>Integrated Tourism / Leisure / Recreational Complexes</u></p> <p><i>Integrated tourism / leisure / recreational (ITLR) complexes are medium to large-scale leisure and recreational developments that will often include accommodation facilities. The development of a limited number of exceptionally high quality integrated tourism, leisure and recreational complexes at appropriate locations, particularly untraditional tourist locations, can have positive results in terms of realizing the creation of new tourism products and in terms of promoting tourism growth.</i></p> <p><i>They will normally include some of the following uses: Hotel and associated facilities, restaurants / cafes, conference centre, golf course, equestrian centre, trekking centre, fitness centre, indoor/outdoor water facility, fishing facility, indoor/outdoor ski centre, museums/art galleries, nature trails, walking routes and associated facilities. They may also include tourist related residential and retail facilities that are ancillary to the main tourist attraction.</i></p>	<p>It is submitted that the proposed development is a medium sized Integrated tourism/leisure /recreational (ITLR)complex as defined in the Wicklow County Development Plan.</p>

Policy/objective/development management	Comment
<p><u>Marine Planning and Coastal Zone Management</u></p> <p><i>The coastal areas of County Wicklow are amongst the most scenic, sensitive and valuable resources in the County. Many diverse activities and industries, including marine and coastal recreation and tourism, fisheries and aquaculture, shipping and port activities, energy production and other commerce/trade, along with Wicklow's largest towns, are located along Wicklow's coastline. An integrated coastal zone management approach, with a variety of relevant organisations, has an important role to play in addressing the challenge of climate change.</i></p> <p><i>The subject site is situated within Cell 8 Wicklow Head / Kilpoole.</i></p> <p><i>The cell consists of the coastal area between Local</i></p>	<p>The subject site is located within Cell 8 of the coastal zone management area.</p> <p>The proposed ITLR will capitalise on the scenic and coastal amenities as its main tourism product.</p> <p>A number of site characterisation and ground investigation studies, environmental and ecological assessments, landscape visual assessments and Slope Stability Assessment and Coastal Erosion Assessment have been</p>

<p>Road L-5103 and regional road R750 and the coast from the southern boundary for Wicklow Town – Rathnew to Furzeditch and includes Wicklow Head. This mainly agricultural area is under pressure for development (particular urban generated rural housing) and as a result is significantly developed with single rural houses and one larger scale development at Blainroe. This is a high amenity area, being the location of the highly attractive and visited beaches of Silver Strand, Magheramore and Magherabeg. The Magherabeg Dunes are designated a cSAC and pNHA.</p>	<p>carried out in relation to the proposed development to determine any potential impacts on character and amenity of this coastal zone.</p>
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Policy/objective/development management	Comment
<p><u>Rural Employment Objective – CPO 9.32:</u> <i>To permit the development of employment generating developments in rural areas, where it is proven that the proposed development requires to be located in a rural area (e.g. dependent on an existing local resource) and will have a positive impact on the location.</i></p>	<p>The proposed ITLR complex is located within a rural area. The proposal will be dependent on the existing coastal amenity of Magheramore beach. An Economic and Financial Analysis submitted with this application notes that the proposed development would employ c.160 people throughout the year.</p>

Policy/objective/development management	Comment
<p><u>CPO 11.1</u> <i>To promote, encourage and facilitate the development of the tourism and recreation sectors in a sustainable manner.</i></p>	<p>It is considered that this is a worthy and sustainable tourism development that should be facilitated by Wicklow County Council.</p>

Policy/objective/development management	Comment
<p><u>CPO 11.2</u> <i>To ensure that all tourism and recreation developments are designed to the highest quality and standards.</i></p>	<p>Having regard to the studies, assessments and reports carried out in relation to all aspects of the site conditions, design, layout and siting of the proposed development, it is submitted that the proposal is in accordance with this policy.</p>

Policy/objective/development management	Comment
<p><i>CPO 11.3 To generally require tourism and recreation related developments to locate within existing towns and villages, except where the nature of the activity proposed renders this unfeasible or undesirable. Within existing towns and villages, the Planning Authority will promote and facilitate the development of tourist related uses at appropriate sites. In all cases, the applicant must submit a robust assessment setting out the sustainability of any proposal with respect to economic, environmental and social sustainability, as defined herein.</i></p>	<p>The proposed development is not located within an existing town or village. The proposed development relies on the coastal amenity that Magheramore beach offers and therefore, it would not be feasible to locate within an existing town or village.</p> <p>It is considered that the information supplied with this planning application forms a robust and detailed assessment of the proposal.</p>
Policy/objective/development management	Comment
<p><i>CPO 11.4 To only permit the development of a tourism or recreational facility in a rural area in cases where the product or activity is dependent on its location in a rural situation and where it can be demonstrated that the proposed development does not adversely affect the character, environmental quality and amenity of the rural area or the vitality of any settlement and the provision of infrastructure therein. The natural resource / tourist product / tourist attraction that is essential to the activity shall be located at the site or in close proximity to the site, of the proposed development. The need to locate in a particular area must be balanced against the environmental impact of the development and benefits to the local community.</i></p>	<p>As above.</p> <p>The proposed development is not located within an existing town or village. The proposed development relies on the coastal amenity that Magheramore beach offers and therefore, it would not be feasible to locate within an existing town or village.</p> <p>It is considered that the information supplied with this planning application forms a robust and detailed assessment of the proposal.</p>

Policy/objective/development management	Comment
<p><i>CPO 11.5 The Planning Authority recognises that certain tourist facilities that are located in rural areas may be provided as stand alone development, and that ancillary uses (e.g. club house, café, restaurant, shop etc) may be required in order to ensure the long term viability of the tourist facility. Additional uses will only be permitted in cases where the additional use is integrated with and connected to the primary use of the site as a tourist facility, and in cases where the Planning Authority is satisfied</i></p>	<p>The proposed ITLR complex will contain a licensed restaurant, events/function room, gym and a swimming pool to serve guests of the ITLR.</p> <p>A “surf hut” shall also be constructed on site. This is currently being operated from a shipping container located on the beach. By provided a dedicated structure closer to the proposed main building of the ITLR is in</p>

<i>that the additional use is ancillary to the primary use of the site as a tourist facility. The additional use shall be located adjacent to the tourist facility, and avail of shared infrastructure and services, in so far as possible.</i>	accordance with Objective CPO 11.5 which seeks to integrate recreational uses.
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Policy/objective/development management	Comment
<i>CPO 11.6 To ensure that tourism and recreation related developments are appropriately located in the County. Subject to the following exceptions, all tourist and recreation related developments are open for consideration in all landscape areas: The following tourist uses will not be permitted within the Area of Outstanding Natural Beauty (both the Mountain Uplands Area and the Coastal Area): Static caravans and mobile homes.</i>	<p>The proposed development does not include static caravans or mobile homes.</p> <p>Having regard to the design of the proposed ITLR complex and the coastal tourism product on which it relies, the site assessments and reports submitted with this application, it is considered that the proposal is appropriately located.</p>

Policy/objective/development management	Comment
<i>CPO 11.10 To facilitate the development of a variety of quality accommodation types, at various locations, throughout the County.</i>	It is considered that the proposed development will provide a varied type of tourist accommodation.

Policy/objective/development management	Comment
<p><i>CPO 11.11 To positively consider the development of new hotels in all parts of the County, with particular preference for locations in larger settlements (Levels 1-6 of the County settlement hierarchy). In other, more rural locations (villages / rural areas), it must be demonstrated that:</i></p> <ul style="list-style-type: none"> <i>the area proposed to be served by the new development has high visitor numbers associated with an existing attraction / facility;</i> <i>a need for new / additional hotel type accommodation for these visitors has been identified having regard to the profile of the visitor and the availability and proximity of existing hotels in the area; and</i> <i>the distance of the location from a significant settlement is such that visitors to the area /attraction are unlikely to avail of existing hotel facilities.</i> 	<p>The subject site is located in a rural area.</p> <p>It is considered that Magheramore beach is a popular tourist attraction. The existing access and facilities is inadequate for the level of visitor numbers at present.</p> <p>The closest tourism accommodation to Magheramore beach is c. 2km walk to the north.</p> <p>Having regard to the type of ITLR complex proposed, The Economic and Financial Analysis submitted with this application, the adjoining amenity of Magheramore beach and the distance from the nearest tourist accommodation, it is submitted that the need for an ITLR complex at this location has been adequately demonstrated.</p>

Policy/objective/development management	Comment
<p><i>CPO 11.23 To require all applications for development at identified or new ITLR sites to comply with the following requirements:</i></p> <p><i>Development shall be carried out on the basis of an integrated, comprehensive masterplan and business plan, to be agreed at the outset of the development with the Planning Authority;</i></p> <ul style="list-style-type: none"> • <i>the development as a whole shall be held in the single ownership of the developer. In the event that certain elements of the development will require to be sold / leased to make the project viable, this shall be stated at the outset and measures proposed to operate / manage / market the entirety of the facility as a single entity;</i> • <i>any holiday home / self catering type accommodation proposed as part of the facility shall accord with CPO 11.14; and</i> • <i>all development shall be so designed to respect the character of the area and any existing heritage features on the site, including demesne houses or other protected features.</i> 	<p>Developing tourism facilities has wide ranging social and environmental benefits for host communities, with tourism initiatives often making key assets and attractions more accessible, supporting environmental improvements and sustaining services and events that would not otherwise be viable.</p> <p>There is a need to attract and support new forms of tourism accommodation combine all elements of the tourist experience according to the Accommodation Study carried out by Colliers on behalf of the County Wicklow Accommodation Working Group.</p> <p>The proposed ITLR is accompanied by an Economic and Financial Analysis, detailed Architect Design Strategy and supporting environmental, ecological and hydrogeological assessments.</p> <p>The developer shall retain single ownership of the development as a whole.</p> <p>CPO 11.14 does not apply to this proposed development.</p>

Policy/objective/development management	Comment
<p><i>CPO 19.4 To support the development of Marine Tourism, especially with regard to development of Wicklow's harbours, beaches, marine landscape, maritime cultural heritage and water related activities, including leisure and recreational tourism, subject to compliance with environmental requirements.</i></p>	<p>This is an ITLR development related to marine landscape and recreational tourism. Having regard to the environmental and ecological assessments submitted in relation to the proposal, it is considered that it is in compliance with this policy objective.</p>

Policy/objective/development management	Comment
<p><i>CPO 19.8 To protect the character and visual potential of the coast and conserve the character and quality of seascapes.</i></p>	<p>Having regard to the design, layout and siting of the proposed development, it is considered the proposal will not injure the character or visual amenity of the coast.</p>

Policy/objective/development management	Comment
<i>CPO19.9 To strictly control the nature and pattern of development within coastal areas and ensure that it is designed and landscaped to the highest standards, and sited appropriately so as not to detract from the visual amenity of the area. Development shall be prohibited where the development poses a significant or potential threat to coastal habitats or features, and/or where the development is likely to result in undesirable patterns of erosion or deposition elsewhere along the coast.</i>	As above. Having regard to the design, layout and siting of the proposed development, it is considered the proposal will not injure the character or visual amenity of the coast.

Policy/objective/development management	Comment
<i>CPO 19.11 To protect both public and private investment by prohibiting any new building or development (including caravans and temporary dwellings) within 100m of soft shorelines i.e. shorelines that are prone to erosion, unless it can be objectively established based on the best scientific information at the time of the application, that the likelihood of erosion at a specific location is minimal taking into account, inter alia, any impacts.</i>	At its closest point, the proposed main building is c. 65 metres from the beginning of the slope down towards the cliffs. It is c. 100 metres from the actual shoreline. It is submitted that the engineering studies and reports submitted as part of this application for permission for development provide scientific evidence that there is no significant coastal erosion at this site and therefore, is in accordance with Objective CPO 19.9 and Objective CPO 19.11.

Policy/objective/development management	Comment
<i>CPO 19.23 (1) To preserve the open character of Wicklow Head.</i>	We have strived in our design to maintain public access to Magheramore Beach and in that part of the coastline maintain open access south of Wicklow head.
<i>CPO 19.23 (2) No development will be permitted that has an adverse impact on the environmental and ecological quality of the Magherabeg pNHA / cSAC or Vulnerable Aquifer designations in the area. The Planning Authority will have particular regard to the impact that all developments have on the integrity of a SAC, including development that is within a SAC and development that is not within a designated area, but which is likely to have an effect thereon.</i>	The protection of the SAC is fundamental to our design. As part of our design we have incorporated surveys from Joanne Denyer on Tufa Springs, AGL on site and slope stability along with environmental impact reports from AWN. We believe based on the extent of information compiled and addressed in the design we would provide a development that will not adversely impact on the SAC.

<p><i>CPO 19.23 (3) Development that is detrimental to the quality or amenity of heritage features will not be permitted, including views and prospects, archaeological features, protected trees/structures.</i></p>	<p>As outlined in Lawrence and Long Architects report the parameters taken onto account in the design of the project is to ensure the proposal does not impact on views, prospects, archaeological features (of which there are none on this site) protected trees (our access road and landscape design have taken account of all existing trees and maintained them) and protected structures (again none exist on this site)</p>
<p><i>CPO 19.23 (4) To strictly control the further proliferation of sea outfalls for effluent discharge and in particular to prohibit short sea outfalls. All effluent discharges should be in compliance with the EU Bathing Water Directive.</i></p>	<p>As per BMSE design there will be no effluent discharge from this site.</p>
<p><i>CPO 19.23 (5) To facilitate the development of new tourist accommodation subject to the following controls:</i></p> <ul style="list-style-type: none"> <i>a) The development of new tourist accommodation shall be restricted to the existing development cluster at Blainroe or to existing developed sites;</i> <i>b) Permission will only be considered for new accommodation where the development forms part of a well developed, integrated tourism and recreation development, which would add to the public amenity and enjoyment of the area and provides a significant public element (e.g. public car parking, playground / indoor play zone, swimming pool open to paying public etc);</i> <i>c) the development of any further static or touring caravan parks shall be prohibited;</i> <i>d) the development of any further holiday homes shall be prohibited, other than a small scale element of which may be allowable in an integrated development that provides a range of accommodation types;</i> <i>e) automated gates will not be permitted on any development.</i> 	<ul style="list-style-type: none"> a) The proposed ITLR complex is not compatible with the existing cluster at Blainroe. Therefore it is considered that Objective CPO 19.23 (5)(a) does not apply. b) Although the beach is not included within the boundary of this application, it is within the applicant's ownership, and provides a significant public element. Pedestrian access to the beach via the laneway, for members of the general public, shall be maintained as per the current arrangement. The inclusion of the improved surf facility within the site will also add to the recreation development. c) The proposal does not include any static caravans or mobile homes. d) It is not the intention of the development to provide any further holiday homes. e) The laneway access to Magheramore beach will not impede public pedestrian access at any time. It is intended to provide a barrier system to restrict vehicular access. This will be managed by the staff of the ITLR and will not restrict emergency vehicle access.
<p><i>CPO 19.23 (6) To strictly control the development of new entrances and access driveways on the R750 to those which can be proven to be necessary for either traffic safety reasons or the normal functioning of the landholding.</i></p>	<p>It is not intended to provide a new entrance for this development. It is intended to upgrade the existing public pedestrian access laneway and to also allow for vehicular access to the proposed ITLR development.</p>

<p><i>CPO 19.23 (7) To control and limit the development of permanent rural housing to that shown to be strictly necessary (in accordance with the County settlement and rural development strategies) and to require the highest standards of siting and design for any new dwelling and regard to environmental designations.</i></p>	<p>This proposal does not include the development of new permanent rural housing.</p>
<p><i>CPO 19.23 (8) To conserve the right of way from the Wicklow Town settlement boundary along the coastline to Brides Head and Lime Kiln Bay.</i></p>	<p>This proposed development will not impact on the right of way from the Wicklow Town settlement boundary along the coastline to Brides Head and Lime Kiln Bay.</p>
<p><i>CPO 19.23 (9) To facilitate coastal protection works (natural, soft and hard engineered), to protect the amenity and ecological value of the coastline.</i></p>	<p>As outlined above public access to the coastline will not be impeded. It is intended to allow all access required to protect the amenity and ecological value of the coastline. To this end as outlined in survey supplied by AGL and report by Enviroguide it is intended to restrict access to the parts of site at top of cliff face where slope stability is vulnerable. At present this is frequently accessed by the public which is causing harm to this part of the site. Through landscape design and install of timber fences it is proposed that these areas will no longer be accessible.</p>

Development Plan Appendix 1 – ‘Development and Design Standards’

This Appendix sets out general criteria for tourism and recreation developments.

Tourism and recreation developments shall be assessed against the following criteria:

- *The nature, scale and use of a development*
- *shall be appropriate to the character of the area in which it is to be located and shall be visually sympathetic to its surroundings. This shall apply to matters such as the type of use, number of employees, hours of operation, amount of expected visitors, site area, building size, design, layout etc, as well as to the particular land use, and the economic and social requirements of the area and its surroundings;*
- *The development shall not give rise to any significant adverse environmental impact, in terms of detrimental impact on the scenic value, heritage value and the environmental, ecological, or conservation quality of the area. It shall not have a negative impact on the surrounding area in terms of nuisance, noise, odours or other pollutants;*
- *The development shall not be detrimental to the amenity of nearby properties, and in particular, to the amenity of nearby residential properties;*
- *The proposal shall be acceptable in terms of the following traffic and parking issues:*
 - *Car parking is required to be in accordance with the standards of the plan. Car parking shall be provided within the boundary of the site, unless the Planning Authority agrees other suitable arrangements;*
 - *There shall be safe vehicular access to and from the road network;*
 - *The capacity of access roads shall be adequate for the likely levels of traffic generated by the proposal;*
 - *There is adequate provision for pedestrians, cyclists and public transport providers.*
- *The proposal shall be acceptable in terms of water supply, wastewater disposal and surface water drainage;*
- *All developments in rural areas must be capable of being satisfactorily screened and assimilated into the landscape;*
- *Developments should generate economic and social benefits for local people and enhance the well-being of host communities.*

Applications for tourism and recreation developments in rural areas shall be accompanied by the following information, in addition to that required to be submitted under the Planning Regulations:

- *Comprehensive justification of need for the development;*
- *Overall masterplan for the development;*

- *Evaluation of compliance of the proposed development with the other requirements of the County Development Plan here set out;*

Section 5.2 of Appendix 1 provides general criteria in relation to overnight accommodation.

Applications will be considered on the basis of the particular characteristics of the proposed scheme. The Planning Authority will have regard to the following matters in the evaluation of planning applications for accommodation:

- *Compliance with Objectives 11.10 – 11.19 of the County Development Plan (Chapter 11)*
- *The size, scale, design and nature of the accommodation;*
- *The availability of existing accommodation facilities in the vicinity;*
- *The standard of accommodation for the intended occupiers of the premises (including indoor and outdoor space and amenity requirements, noise insulation, parking provision, access, etc.)*

The scale of overnight accommodation allowable on any site may be restricted according to the amenities proposed to be provided for guests and the impact of the facility on the amenities of the area.

Adequate information will be required to be submitted to satisfy the Planning Authority that the design, size and nature of a proposed facility are such that no doubt exists regarding the intended use of the facility as tourist accommodation. In particular, the Planning Authority shall be satisfied that the development is to be retained for visitor accommodation use and will not be used for long term, permanent residential use or other non-tourist use.

Having regard to the nature, scale and use of proposed development described within this planning application, the increased demand for tourism accommodation and facilities particularly at this location and the comprehensive schedule of site surveys, engineering reports, ecological and landscape studies and detailed architectural drawings for a sensitively designed integrated development is considered to be in accordance with the tourism, economic, environmental, coastal and development management objectives contained within in the Wicklow County Development Plan 2022-2028 and Appendix 1.

Section 6 of this Planning Report provides an assessment of the proposed development having regard to the comprehensive statutory policy, design guidance and criteria described in this section of the report.

6 Planning Assessment

6.1 Principle of Development

The proposal is considered to be in accordance with the vision for the County, the tourism, economic, environmental, coastal and development management objectives contained within in the Wicklow County Development Plan 2022-2028.

The project vision is to create a beautiful, world class destination for people to enjoy within a wonderful setting. This medium scale Integrated tourism / leisure / recreational (ITLR) development will include a function room, gym, outdoor swimming pool and accommodation facilities, providing a recreational and tourism amenity by incorporating and promoting sea swimming, surfing and walking/hiking as well as bringing employment to the area. Once the proposed development is completed, there will be 48 high-quality Accommodation Pods, with capacity for 2 people per pod. This would provide accommodation for at 96 visitors at any onetime.

CPO 11.23 To require all applications for development at identified or new ITLR sites to comply with the following requirements:

- *Development shall be carried out on the basis of an integrated, comprehensive master plan and business plan, to be agreed at the outset of the development with the Planning Authority;*
- *The development as a whole shall be held in the single ownership of the developer. In the event that certain elements of the development will require to be sold / leased to make the project viable, this shall be stated at the outset and measures proposed to operate / manage / market the entirety of the facility as a single entity;*
- *any holiday home / self catering type accommodation proposed as part of the facility shall accord with CPO 11.14; and*
- *all development shall be so designed to respect the character of the area and any existing heritage features on the site, including demesne houses or other protected features.*

A Pre-Application Consultation was undertaken between the applicant and their design team and Wicklow County Council in relation to the proposed ITLR development on 17th November 2021. An Economic and Financial Analysis has been prepared by Jim Power Economics to detail the viability and management of the proposed development over the short, medium and long term.

The developer shall retain single ownership of the development as a whole.

This is **not** holiday home/self catering type accommodation and therefore *Objective CPO 11.14* does not apply.

The site is located along the Southern Coastline encompassing Wicklow Head and extending as far south as Arklow Rock. This area comprises of the main sandy

beaches of Brittas and Clogga and provides for a continuous prospect and numerous views from the coast road out to sea. The subject site is located adjacent Magherabeg Dunes SAC (001766).

These areas are important not just from a landscape or habitat perspective, but also are increasingly important for recreational activities, the development and promotion of which must be managed appropriately.

Strategic Outcome SCO9 - Tourism

“Capitalise on Wicklow’s location within Ireland’s Ancient East and facilitate a year round tourism industry that harnesses Wicklow’s natural amenities and vast recreational opportunities. Ensure that tourism development respects and protects the very assets it depends upon.”

CPO 11.1 To promote, encourage and facilitate the development of the tourism and recreation sectors in a sustainable manner.

CPO 11.3 To generally require tourism and recreation related developments to locate within existing towns and villages, except where the nature of the activity proposed renders this unfeasible or undesirable. Within existing towns and villages, the Planning Authority will promote and facilitate the development of tourist related uses at appropriate sites. In all cases, the applicant must submit a robust assessment setting out the sustainability of any proposal with respect to economic, environmental and social sustainability, as defined herein.

CPO11.4 To only permit the development of a tourism or recreational facility in a rural area in cases where the product or activity is dependent on its location in a rural situation and where it can be demonstrated that the proposed development does not adversely affect the character, environmental quality and amenity of the rural area or the vitality of any settlement and the provision of infrastructure therein. The natural resource/ tourist product / tourist attraction that is essential to the activity shall be located at the site or in close proximity to the site, of the proposed development. The need to locate in a particular area must be balanced against the environmental impact of the development and benefits to the local community.

CPO11.5 The Planning Authority recognizes that certain tourist facilities that are located in rural areas may be provided as stand alone development, and that ancillary uses (e.g. club house, café, restaurant, shop etc) may be required in order to ensure the long term viability of the tourist facility. Additional uses will only be permitted in cases where the additional use is integrated with and connected to the primary use of the site as a tourist facility, and in cases where the Planning Authority is satisfied that the additional use is ancillary to the primary use of the site as a tourist facility.

The additional use shall be located adjacent to the tourist facility, and avail of shared infrastructure and services, insofar as possible.

CPO 11.6 To ensure that tourism and recreation related developments are appropriately located in the County. Subject to the following exceptions, all tourist and recreation related developments are open for consideration in all landscape areas: The following tourist uses will not be permitted within the Area of Outstanding Natural Beauty (both the Mountain Uplands Area and the Coastal Area): Static caravans and mobile homes.

CPO 11.10 To facilitate the development of a variety of quality accommodation types, at various locations, throughout the County.

CPO 11.11 To positively consider the development of new hotels in all parts of the County, with particular preference for locations in larger settlements (Levels 1-6 of the County settlement hierarchy). In other, more rural locations (villages / rural areas), it must be demonstrated that:

- the area proposed to be served by the new development has high visitor numbers associated with an existing attraction / facility;*
- a need for new / additional hotel type accommodation for these visitors has been identified having regard to the profile of the visitor and the availability and proximity of existing hotels in the area; and*
- the distance of the location from a significant settlement is such that visitors to the area / attraction are unlikely to avail of existing hotel facilities.*

CPO 19.23(5) To facilitate the development of new tourist accommodation subject to the following controls:

a) The development of new tourist accommodation shall be restricted to the existing development cluster at Blainroe or to existing developed sites;

b) Permission will only be considered for new accommodation where the development forms part of a well developed, integrated tourism and recreation development, which would add to the public amenity and enjoyment of the area and provides a significant public element.

c) the development of any further static or touring caravan parks shall be prohibited; and

d) the development of any further holiday homes shall be prohibited, other than a small scale element of which may be allowable in an integrated development that provides a range of accommodation types;

Rural Employment Objective - CPO9.32:

To permit the development of employment generating developments in rural areas, where it is proven that the proposed development requires to be

located in a rural area (e.g. dependent on an existing local resource) and will have a positive impact on the location.

The proposed development is dependent on its strategic location overlooking the sandy beach of Magheramore and views of the cliffs as its tourist product/attraction. Protecting, restoring and enhancing the landscape quality and ecological biodiversity as well as meeting climate change and tourism infrastructure aspirations and increasing accessibility for recreation are key elements of this proposed ITLR development. It is anticipated that the proposed development will employ c.160 people throughout the year.

It is considered that the proposed development is in accordance with the *Strategic Outcome SCO9 - Tourism* and the *Rural Employment Objective - CPO 9.32*.

The proposed tourism accommodation is not compatible with the existing cluster at Blainroe. Therefore it is considered that *Objective CPO 19.23(5)(a)* does not apply.

Although the beach is not included within the boundary of this application, it is within the applicants ownership, and provides a significant public element. Pedestrian access to the beach via the laneway, for members of the general public, shall be maintained as per the current arrangement. Public W.C's and showers are also proposed within the new surf hut building. It is submitted that the proposed development is in accordance with *Objective CPO 19.23(5)(b)* and permission should be considered for this new tourist accommodation.

Recently, we acted as planning consultants for a similar type of tourist accommodation (i.e. accommodation pods overlooking an SAC waterbody) which was granted permission at Glasson Lakehouse Hotel in County Westmeath (Reg. Ref.21/553). Although the main hotel building already exists on site and is very successful, tourists are seeking more niche accommodation styles close to nature. We refer to that application as there are many similarities in terms of the increased demand for this type of tourism accommodation and successfully integrating it within close proximity to Natura 2000 sites.

This planning application demonstrates the quality of the proposal and how it will integrate with the overall tourism, recreation and leisure offering of the surrounding area. A substantial number of studies, surveys, mapping, drawings and reports have been prepared in relation to the proposed development, as listed in the introduction to this report, the site and its surrounding area which demonstrate that the principle of the proposed development is appropriate and acceptable at this location and will benefit the local community and is therefore, in accordance with the Wicklow County Development Plan 2022-2028 policy objectives listed above.

6.2 Economic and Financial Analysis

A Report has been prepared by Jim Power Economic Consultants assessing the economic outcomes of the proposed development and is included with the application.

In summary their report examines the potential economic and social contribution of the proposed development as follows. The report states,

“The project involves a significant capital investment of €40 million. It will provide considerable employment during the anticipated 18-month construction phase and will provide considerable employment once it becomes operational. It will help develop the overall tourism product in an area that has been targeted for tourism development and it will make a meaningful economic and social contribution to a county that needs economic growth and development.

The proposed development at Magheramore would have a significant social and economic impact on the area.

- It would promote growth in the visitor economy of the area through the creation of new enterprises and jobs.
- It would enhance seasonality, by providing a diversified product, with indoor and outdoor facilities, thereby making it less impacted by weather conditions and the time of year. The beach has a strong reputation for surfers, so the development of a surf school and a surf hut, along with visitor accommodation, would seriously enhance this area as a visitor destination.
- It would help promote a better regional spread of tourism.
- It would generate employment and increase the vibrancy of the local communities.

In assessing the overall economic impact of the proposed development, it is appropriate to analyse it in 2 phases – *Construction Phase and Operational Phase.*”

Construction Phase: The estimated capital cost of the proposed development is €40 million. It is estimated that the development would take 18 months to complete post planning. 200 employees would be on site during the period of development. CSO data suggest that in the third quarter of 2022, average weekly earnings in construction were €913.75, which would equate to around €47,515 per year.

For 200 construction workers on site for 18 months:

- The net earnings received by workers is estimated at €10.7 million.
- The multiplier effect basically seeks to capture how many times a given euro spent in an economy literally turns-over or otherwise results in other transactions. If a conservative income multiplier effect of 1.5 is assumed, this means that the net wages of €10.7 million, would result in expenditure of €16 million in the broader economy. (Table 3).

Gross Wage Bill (18 Months)	€14,254,500
Employee Taxes	€3,563,625
Employer Payroll Taxes	€1,532,359
Payroll Tax Contribution to Exchequer	€5,095,984
Net Wages Paid	€10,690,875
Income Multiplier Effect (1.5 Times)	€16,036,312

Table 3: Economic Contribution during Construction Phase

Operational Phase: Once the proposed development is operational, the economic and financial contribution is delivered through employment supported; tourism expenditure; associated taxation; and local authority charges.

It is envisaged that once the development is operational, there will be a requirement for 160 staff, both full-time and part-time. Based on CSO data, an average annual wage of €26,000 is assumed, taking account of both full-time and part-time workers.

Gross Wage Bill	€4,160,000
Employee Taxes	€832,000
Employer Payroll Taxes	€447,200
Payroll Tax Contribution to Exchequer	€1,279,200
Net Wages Paid	€3,328,000
Income Multiplier Effect (1.5 Times)	€4,992,000

Table 4: Annual Economic Contribution in Operational Phase

For 160 workers:

- The net earnings received by workers is estimated at €3.33 million.
- The annual contribution to the Exchequer in payroll taxes is estimated at €1.3 million.
- The net wages of €3.3 million, would result in expenditure of €4.99 million in the broader economy.

The Tourism Contribution: Once the proposed development is completed, there will be 48 high-quality Accommodation Pods, with capacity for 2 people per pod. This would provide accommodation for at 96 visitors at any one time. Over the course of a full year, this would equate to 35,040 bed nights. If an average occupancy rate of 70 per cent is assumed over the year, this would equate to 24,528 bed nights.

The diversified and high-quality nature of the development would attract tourists to the area. With high quality promotion and marketing, it should be possible to attract a considerable number of overseas visitors, as well as domestic visitors. The diversified nature of the offering would address the issues of seasonality and address the shoulder season problem that affects many Irish tourist destinations.

If a 40/60 split between overseas and domestic visitors is assumed, the economic and financial contribution would be very significant.

Failte Ireland research suggests that Overseas Holidaymakers on average spend €96 per day and Domestic Overnight Visitors spend €71 per day.

This would generate €2.8 million in extra tourism revenues in the area.

6.3 **Appropriate Assessment, Natura Impact Statement and Ecological Impact Assessment**

An Appropriate Assessment Screening and Natura Impact Statement was carried out by Enviroguide Consulting.

The AA Screening identified one European site to be at risk of potential significant impacts as a result of the Proposed Development, namely the Magherabeg Dunes SAC (001766), located adjacent to the Site. Accordingly, a Natura Impact Statement (NIS) was prepared to assess the impacts in detail and to provide suitable mitigation measures. The following conclusion is extracted from the NIS accompanying this planning application:

“This Natura Impact Statement details the findings of the Stage 2 Appropriate Assessment conducted to further examine the potential effects of the Proposed Integrated Tourism / Leisure / Recreational (ITLR) Development at Magheramore, Co. Wicklow, on the following European site:

- **Magherabeg Dunes SAC (001766)**

The above site was identified by a screening exercise that assessed likely significant effects of a range of effects that may arise from the Proposed Development. This NIS investigated the potential direct and indirect impacts of the Proposed Works, both during Construction and Operation on the integrity and qualifying interests of the above European site alone and in combination with other plans and projects, taking into account the site's structure, function and conservation objectives.

Where potentially significant effects were identified, a range of mitigation and avoidance measures have been suggested to avoid them. This NIS has concluded that, once the avoidance and mitigation measures are implemented as proposed, the Proposed Development will not have an adverse effect on the integrity of the above European site, individually or in combination with other plans and projects.

Where applicable, a suite of monitoring surveys have been proposed to confirm the efficacy of said measures in relation to ensuring no adverse impacts on the habitats of the Magherabeg Dunes SAC have occurred.

As a result of the complete, precise and definitive findings in of this NIS, it has been concluded, beyond reasonable scientific doubt, that the Proposed Development will have no adverse effects on the qualifying interests, special conservation interests and on the integrity and extent of Magherabeg Dunes SAC (001766).

Accordingly, the Proposed Development will not adversely affect the integrity of any relevant European site.”

An Ecological Impact Assessment (EcIA) has also been carried out by Enviroguide Consulting.

The EcIA assesses the potential effects of the Proposed Development's construction and operational phase on habitats and species; particularly those protected by National and International legislation or considered to be of particular nature conservation importance.

The specific objectives of the study were to:

- *Undertake baseline ecological surveys and evaluate the nature conservation importance of the Site of the Proposed Development;*
- *Identify and assess the direct, indirect, and cumulative ecological implications or impacts of the Proposed Development during its lifetime; and*
- *Where possible, propose mitigation measures to remove or reduce those impacts at the appropriate stage of development.*

The conclusions of the EcIA are listed below:

"The design of the Proposed Development has been carried out with consideration of the sensitivities of the Site and its surrounding environment by maintaining ecological corridors and mature treelines, complementing the existing vegetation by a carefully planned planting scheme, and including Environmental Awareness and Education as part of the mitigation measures. The awareness measures are likely to also benefit the adjacent Magherabeg Dunes SAC by increasing public awareness of its sensitivities.

The majority of any residual impacts are of short-term duration during the Construction Phase of the Proposed Development. It is considered that provided the mitigation measures and monitoring proposed are carried out in full, there will be no significant negative impact to any valued habitats, designated sites or individual or group of species as a result of the Proposed Development."

6.4 Architectural Design Statement

A Design Statement has been prepared by Lawrence and Long Architects. This document provides detailed information in relation to the existing landscape of the subject site, the scale, form, materials, structure and visual images of the proposed development. The Design Statement also contains precedents of similar tourism offerings at Inis Meán and the Ice House in Ballina, Co. Mayo.

The entire development has been carefully designed to take account of the sensitive nature of the site and location. The access road leading from the guest car park at the north end of the site and paths leading to the guest lodges, are made of loose gravel set in egg-crate/Grasscrete and has been designed to be permeable to ensure rainwater run off. See Drainage layout drawings and details prepared by Barrett Mahony Consulting Engineers enclosed with this application.

To the south at widest part of the site, there is a recharge area which feeds a tufa bed to the east. In addition a slope failure zone imposes further restrictions. A Petrifying Spring Survey carried out by Denyer Ecology and a Slope Stability Assessment and Coastal Erosion Assessment, carried out by AGL Geotechnical Engineers have informed the proposed layout of the site.

In order to mitigate any risk to these sensitive areas the guest lodges have been set back from the slope failure zone entirely and those few lodges which lie within the recharge zone are designed as lightweight timber structures that sit on a narrow base supported on small diameter (139-168 mm diameter hollow section) prefabricated micro piles to avoid impacting the existing ground water flow path in the area.

The main building lies to the west of the recharge area. A narrow section to the north of the building at the entrance has been designed to span over a small section of the recharge area identified in that location to mitigate impact in that area.

The building generally will be constructed of watertight reinforced concrete at lower ground floor level. The superstructure will comprise a combination of reinforced concrete and load-bearing masonry walls, reinforced concrete slabs and structural steel beams and columns to achieve the required open plan spaces.

The sloping roof of the building will be finished in Irish limestone and designed to be walked on adding further character and amenity in the design of the built structure.

The landscaping proposal prepared by Lawrence & Long Architects with input from Digby Brady Consultant Landscape Architects is contained within the Architectural Design Statement.

The proposal is in accordance with development plan policy;

CPO11.2 To ensure that all tourism and recreation developments are designed to the highest quality and standards.

6.5 Traffic, Transport, Access & Parking

Details in relation to the site access road are contained within Section 5 of the Civil Engineering Infrastructure Report prepared by Barrett Mahony Consulting Engineers.

The existing access road to the site is an unpaved track, typically 3.5m in width. The track is lined with trees along its full length of approximately 500m, with slightly raised embankments on both sides. The distance between the existing trees varies between 3.8m and 6m.

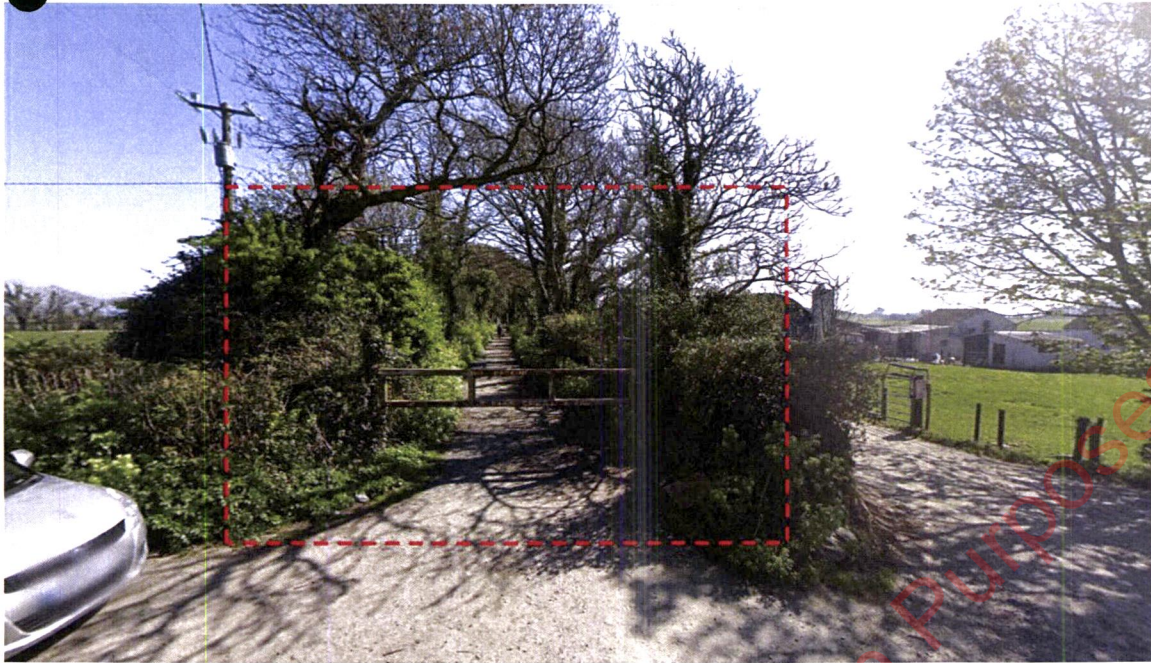


Figure 12: Existing pedestrian laneway showing locked gate

The ownership boundary width is 5.1m at its narrowest point along the length of the access road. Therefore, there is very limited opportunity to widen the access road.

For the proposed development, vehicular access shall be limited to facility staff, guests, servicing, and emergency vehicles only. Vehicular access shall be regulated with the provision of a security barrier with CCTV and intercom close to the junction with the R750. Hence, proposed development traffic flows are controlled and very predictable. Refer to the separate Traffic and Transportation Assessment submitted with this application.

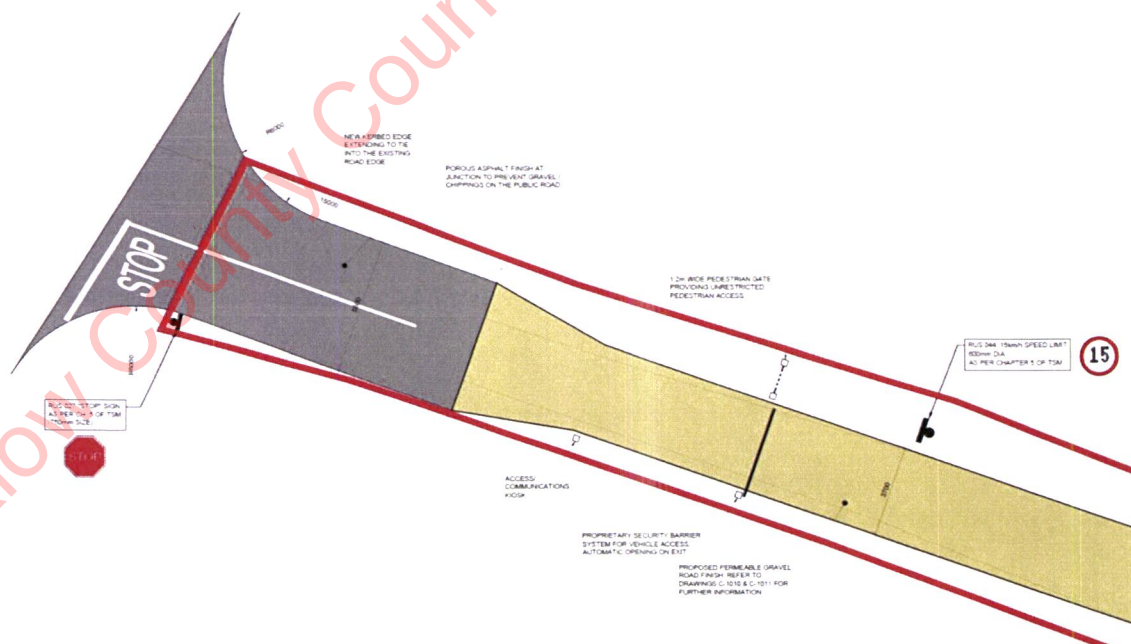


Figure 13: Proposed junction layout drawing

Pedestrian access to the beach via the track, for members of the general public, shall be maintained as per the current arrangement. As a result, the access road will be designated as a slow zone with a 15km/h speed limit, compliant with the DMURS advisory design speeds (10-30km/h) for pedestrian priority areas in Local streets.

The first 15m of the access road from the junction with the R750 shall be 5.5m in width, sufficient to facilitate two-way traffic and long enough to allow for 2 cars queuing in either direction without inhibiting flows or causing stationary waiting on the R750 for entering vehicles. Thereafter, given the very limited and controlled traffic volume which will be permitted on the site, and the limited width available for a access road, a single lane 3.7m wide road will be provided in compliance with the Building Regulations, Technical Guidance Document B – Fire, for fire tender access.

4 No. 5.5m wide by 12m long passing bays shall be provided at approximately equal spacing along the length of the access road, to facilitate passing vehicles with intervisibility between passing bays, achieved due to the straightness of the road. This single lane and passing bay arrangement shall also naturally discourage excessive vehicle speeds. The provision of a single lane will also ensure that the trees along the road can be retained. The road surface shall be a permeable gravel, requiring no positive drainage and thereby, maintaining the natural flow path of stormwater on the site.

Car parking facilities on the site shall be in accordance with requirements of *Volume 3, Appendix 1, Table 2.3 of the Wicklow County Development Plan 2022-2028* which is 1 no. space per bedroom, excluding function rooms/restaurants.

In locations where public transport and parking enforcement are not available, the car parking standards set out in the Development Plan shall be taken as minimum standard in order to ensure that haphazard unregulated car parking does not occur in the vicinity of the development.

There are 48 no. rooms proposed resulting in the need of at least 48 no. car parking spaces. The proposed development contains 46 no. spaces in main car park and 3 no. universal access parking spaces at the new building. The total number of parking spaces provided is 49 no. A drop off zone shall also be provided at the main entrance to the facility. A loading bay shall be provided for deliveries and servicing at the main facility.

The gym/leisure facilities will be for the use of the facility's patrons only and therefore will not generate additional traffic or car parking requirements.

Likewise, the bar and restaurant facilities will be for the use of the facility's patrons only and therefore will not generate additional traffic or car parking requirements.

Car charging facilities shall comply with the requirements of the 2022-2028 WCC Development Plan. All spaces shall be provided with wiring and ducting for future electric charging points and a minimum of 1 no. fully functioning charging point for

● electrical vehicles will be provided for every 10 no. car spaces. i.e. 11 no. fully function charging spaces shall be provided as a minimum, which exceeds current requirements.

Bicycle parking facilities on the site shall be in accordance with requirements of Volume 3 Appendix 1, Table 2.4 of the Wicklow County Development Plan 2022-2028.

Hotel = 1 no. bicycle space per 20 bedrooms

Bar/Lounge = 10% of total car spaces subject to 10 no. minimum.

Therefore, the proposed development will include 13 no. bicycle spaces.

A Traffic Impact Assessment (TIA) has been prepared by Barrett Mahony Consulting Engineers. The purpose of the Traffic Impact Assessment is to assess the current operational efficiency of the existing transport environment and provide details of the assessment undertaken to identify the level of transport impact resulting from the proposed Integrated Tourist, Leisure and Recreation Facility development. The principal objective of the report is to quantify any level of impact across the local road network and subsequently ascertain both the existing and future operational performance of the local road network.

The Assessment concludes the following:

Based on the data and evaluations within this TIA, the following conclusions can be made:

- 1. The network analysis within the TIA indicates that the existing R750 / L1102 junction in the vicinity of the proposed development presently works well within capacity.*
- 2. It is demonstrated that by 2040, the projected year of opening, the junctions analysed will operate with a minimum spare capacity of 84% on its busiest opposed movement.*
- 3. The network analysis within the TIA indicates that the R750 / Beach Road junction due west of the subject site will operate in 2040 with a minimum spare capacity of 97% on its busiest opposed movement.*
- 4. The traffic impact of the proposed tourist and leisure facility is demonstrated to be at very low levels*

This TIA demonstrates that the traffic generated by the proposed 48 No. bedroom units will have a very minor impact on the efficient working of the local road network, in particular the nearby R750 / Magheramore Beach Road and R750 / L1102 priority junctions close to the proposed tourist facility.

6.6 Civil Engineering Infrastructure

A Slope Stability Assessment and Coastal Erosion Assessment was carried out by AGL Geotechnical Engineers, to objectively establish the likelihood of coastal erosion as set out in *Objective's CPO 19.9 and CPO 19.11*.

CPO 19.9 To strictly control the nature and pattern of development within coastal areas and ensure that it is designed and landscaped to the highest standards, and sited appropriately so as not to detract from the visual amenity of the area. Development shall be prohibited where the development poses a significant or potential threat to coastal habitats or features, and/or where the development is likely to result in undesirable patterns of erosion or deposition elsewhere along the coast.

CPO 19.11 To protect both public and private investment by prohibiting any new building or development (including caravans and temporary dwellings) within 100m of soft shorelines, i.e. shorelines that are prone to erosion, unless it can be objectively established based on the best scientific information at the time of the application, that the likelihood of erosion at a specific location is minimal taking into account, inter alia, any impacts.

At its closest point, the proposed main building is c. 65 metres from the beginning of the slope down towards the cliffs. It is c. 100 metres from the actual shoreline. The report includes an outline of the ground and ground water conditions on the site, provides an assessment of the conditions of the slopes on the site addressing slope stability and coastal erosion, and includes recommendations on suitable design options that could be used in detailed design stage for the proposed development on the site. The conclusion of the report is noted below:

“The aerial views indicate that no significant coastal erosion has occurred over the past 28 years (since 1995). There is some evidence of localised erosion and deposition from the 25 inch historical map which was drawn over 100 years ago. However, there is some ambiguity as to the findings from the 6 inch historical map and possibly also the 25 inch map.

The site inspection indicates that there is evidence of coastal erosion in the lower 1m of the slope (unvegetated and exposed overburden) which possibly occurred during storm events. although, the aerial views indicate that this has not been substantial over the past 28 years since 1995. The outcropping rock at the base of the slope at the southern area of the site would assist in protecting the base of the slope from coastal erosion.”

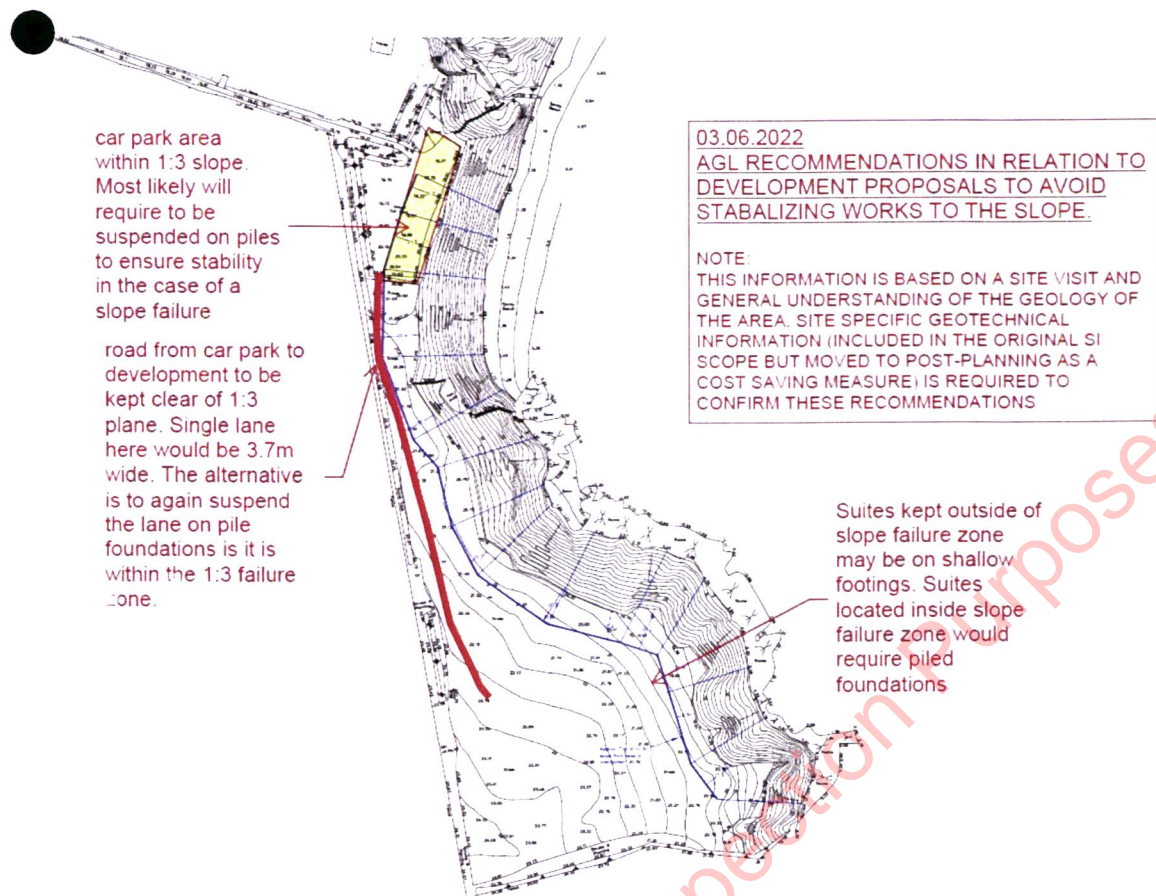


Figure 14: Slope Stability Assessment and Coastal Erosion Assessment Recommendations

The guest lodges have been set back from the slope failure zone entirely and those few lodges which lie within the recharge zone are designed as light weight timber structures that sit on a narrow base supported on small diameter (139-168 mm diameter hollow section) prefabricated micro piles to avoid impacting the existing ground water flow path in the area.

It is submitted that the engineering studies and reports submitted as part of this application for permission for development provide scientific evidence that there is no significant coastal erosion at this site and therefore, is in accordance with *Objective CPO 19.9* and *Objective CPO 19.11*.

A Civil Engineering Infrastructure Report has been prepared by Barrett Mahony Consulting Engineers. The report describes the proposed civil engineering infrastructure for the development and how it connects to the public infrastructure serving the area. The report highlights methods that will be used to comply with the local authority requirements.

In particular, foul and surface water drainage, water supply and access and servicing strategy aspects are addressed. See the following extracts from the Civil Engineering Infrastructure Report.

Existing Surface Water Drainage System - There are no stormwater or combined sewers in the vicinity of the subject site. The existing access track and parking area on the site are unpaved, with no positive drainage.

Soakaway tests were carried out as part of the site-specific site investigation by Ground Investigations Ireland. A site characterisation report was carried out by Trinity Green Environmental Consultants. On the basis of this on-site testing, it is concluded that in moderate intensity and duration rainfall events, the water drains freely to ground, but in more intense and longer duration storm events, the ground becomes saturated and rainfall runoff occurs at surface level across the moderately sloped site from west to east and down the embankment to the beach and shore.

A petrifying spring survey has been carried out by Denyer Ecology to identify the number and location of the springs and tufa formation. The survey identified locations where the springs and tufa formations were located within clay soil strata, above the rock outcrops. To establish potential for ground water within the clay, in the vicinity of the proposed development, to provide groundwater recharge to the petrifying springs and tufa formations located above the rock, Apex Geophysics were engaged to carry out a geophysical survey. The survey established an area where the upper approximate 3.5-4m of firm to stiff clay that may contain more granular sandy gravelly SILT/CLAY material which may act as a zone of recharge to the petrifying springs and tufa formations which are present on the embankment in the clay above the rock.

Proposed Surface Water Drainage System - The presence of the petrifying springs and tufa formations, and subsequent surveys identifying potential links between the ground water from the site with these formations, have guided the proposed surface water management strategy for the proposed development.

The main building has a lower ground floor. The lower ground floor has been positioned outside of the area identified in the geophysical survey as having potential for contributing to ground water recharge to the petrifying springs and tufa formations. A portion of the ground floor level of the building transverses the west edge of the same recharge area. Here, the building will be constructed on a number of discrete piled foundations and suspended above the existing ground surface, in order to ensure there is no negative impact on the ground water flow path. During construction, the lower ground floor shall be provided with a full perimeter sheet pile wall, which will extend into the impermeable clays, 4m+ below existing surface level. This shall ensure that ground water within the zone of recharge will not be impacted by the excavation within the sheet piled wall or any associated dewatering. Once constructed, the roof of the main building will be provided with a conventionally drained roof to ensure that rainwater onto the building will be discharged to ground, as quickly as possible. Rainwater pipes taking all roof rainwater, will discharge to a shallow infiltration trench which will be constructed directly in front of the east elevation. The trench will be provided with a 150mm diameter perforated land drain, which shall distribute the rainwater across the trench. At the end of each trench, the land drain will be connected to an overflow stormwater manhole. In long duration or high intensity events, where the infiltration trench becomes saturated, the

stormwater shall overflow to the end manhole and be drained by gravity through a buried stormwater pipe. It will flow to the east side of the site, from where it will be discharged to a swale. The swale shall provide for further percolation to ground and only in extreme events, will stormwater overtop the swale and flow down the embankment. This shall mimic existing stormwater flow condition on the site, wherein extreme rainfall events, the ground becomes saturated and rainfall runoff occurs at surface level across the moderately sloped site from west to east and down the embankment to the beach and shore.

Each individual bedroom suite will be provided with its own shallow gravel infiltration trench for direct discharge of rainwater collected from each of the suite's roofs to ground at source, to maintain existing conditions.

All external paved surfaces shall be constructed as fully permeable surfaces of either permeable paving, gravel, grass reinforced geosynthetics, or porous asphalt. This shall ensure direct discharge of rainwater to ground at source to maintain the existing conditions.

The proposed development will be designed in accordance with the principles of Sustainable Drainage Systems (SuDS). The applicable SuDS measures which have been chosen for the site are:

- Permeable paving
- Infiltration Systems (Soakaways)
- Swales

The SuDS measures proposed are linked in series, and this is commonly known as a SuDS Management Train, (SMT). The SMT ensures that rainwater falling on a site is captured, conveyed, stored, intercepted, and removed of pollutants correctly and efficiently before it is discharged back into the surrounding water course or network.

To ensure that the SuDS measures proposed are sufficient in removing pollutants from the generated run-off, a SuDS pollutant analysis has been carried out.

The forms of pollutant to the proposed development are from surface water run-off from any roofs or hard landscaped surfaces within the development. The pollution hazards on site are generally „Very low”. It is considered that the SuDS strategy for the site is effective in removing pollutants from the surface water and therefore protecting the receiving ground water.

Foul Drainage System –As there is no public or private drainage infrastructure in the vicinity of the site, it is proposed that wastewater from the proposed development will be treated with an onsite wastewater treatment plant and discharged to ground via a sand polishing filter.

As part of the site investigation for the development, percolation testing was carried out two locations by Dr. Eugene Bolton of Trinity Green Environmental Consultants, who subsequently produced a site characterisation report which specified a secondary treatment system followed by a Tertiary polishing filter and discharge to ground via a gravel base. The location of the polishing filter including, clear offset from the building and boundaries, is indicated on drawing C-1020.

Butlers Manufacturing Services limited, specialists in wastewater treatment systems, have prepared a design for an onsite package wastewater treatment system, which will provide a very high effluent treatment standard prior to discharge to the sand polishing filter.

An offline grease trap shall be incorporated to remove grease wastes from the restaurant and bar wastewater, prior to onward flow to the WWTP.

Foul drainage shall be collected from the main building and each individual bedroom suite and fall by gravity to the southeast corner of the site, where it shall be collected in a 50m³ balance tank, which forms the first component of the wastewater treatment system. This balance tank will also provide 24hour emergency storage of wastewater, should it be required in the event of a power failure, other failure in the treatment plant or downtime during routine maintenance.

Foul drainage from the lower ground floor will be collected in a pump chamber with duty and duty assist pumps which will lift the wastewater to a ground level manhole for onward discharge to the WWTP via gravity. All wastewater infrastructure for the development shall be constructed in accordance with Technical Guidance Document H – Drainage and Wastewater Disposal, Irish Water standard details and tested in accordance with the requirements of the Irish Water Code of Practice for Wastewater.

Wastewater Discharge Calculation			
No. Double Rooms	48	with occupancy of	2.0 person/room
Total No. of Hotel Guests	96		
Allowance for FT Staff (Hotel)	24	1 Person / 2 Bedrooms	
Population Equivalent	=	120 persons	
Demand Rate (Hotel Guests)	=	250 litres/person/day	
Demand Rate (FT Workers)	=	90 litres/person/day	
Avg Day/Peak Week Demand Factor	=	1.1	
Average Demand	=	26,160 l/day	
Average Day/Peak Week Demand	=	28,776 l/day	
Average Day/Peak Week Demand	=	0.333 l/s	
Peaking Factor	=	6	
Peak Demand	=	2.00 l/s	

Figure 15: Proposed Foul Discharge Summary. Extracted from Table 3-1 of the Civil Engineering Infrastructure Report

Proposed Watermain Supply - As there is no public water supply to the site, potable water supply is proposed to be provided via an on-site well bore.

As part of the site investigation carried out by Ground Investigations Ireland, a test well was bored to assess the feasibility of a well water supply for the development. In addition, a number of monitoring wells were bored to assess the potential impact of the use of the well on adjacent properties and the adjacent Special Area of Conservation. AWN Consulting specified a pump test and monitoring regime, which was carried out by Champion pumps. AWN have prepared a separate Hydrogeological Assessment report in relation to the well water supply and pump test.

The building will be provided with potable water storage tanks with 24hour water demand capacity.

2 No. 22,500l water storage tanks will be provided on the site for firefighting purposes, in accordance with BS9990:2015.

6.7 Flood Risk Assessment

A Flood Risk Assessment has been prepared by Barrett Mahony Consulting Engineers. The scope of the report and extracts are as follows:

- *Review of the following information and data:*
 - *Office of Public Works (OPW) Historical Flood Maps*
 - *Wicklow County Development Plan 2022-2028*
 - *Existing Site Topography*
- *Review of potential flooding risks – tidal, fluvial, pluvial and groundwater*
- *Review of nearby site investigations*
- *Review of existing flood mitigation in the area.*
- *Detail further flood mitigation measures to reduce flood risk at the subject site, where necessary*
- *Preparation of site-specific flood risk assessment*

Site Flooding – It has been determined that the site is not subject to flooding from fluvial, coastal and pluvial sources in any of the applicable return periods. Hence, the floor levels need to be set to ensure run-off from adjacent road and footpath surfaces does not occur. In all cases the internal floor levels shall be set a minimum 150mm above the adjacent footpath levels. Where flush thresholds are required for universal access, linear drainage channels shall be provided to ensure any water run-off from the street or footpath is collected in the gravity drainage system.

Overland Flow – The proposed development is to be constructed in the south, east and west of the site, which are not next to any existing buildings. Therefore, there is negligible risk of overland flow entering the subject site and

any flood water which does will be safely discharged towards the sea through the natural slope of the lands.

Impact on Adjacent Lands – There is no anticipated impact on lands adjacent to the site. Overland flows from a drainage system blockage will be directed towards the sea, following the existing flow path as much as possible.

The flood risk assessment has been carried out in accordance with the OPW publication “The Planning System and Flood Risk Assessment Guidelines for Planning Authorities”.

The assessment has concluded that the development is not at risk of flooding from fluvial, pluvial, tidal or ground water sources under the applicable return periods. Neither does the proposed development have any impact on flooding of areas outside the site.

6.8 Landscape Visual Impact Assessment

The proposed development consists of a part 2 storey over lower ground level building and 48 no. accommodation cabins located on the headland overlooking Maheramore Beach and the Irish Sea. The main building is located along the western boundary of the site, c.500 metres from the R750 and c. 100 metres from the coastline. The building rises from the ground at the north to an overall maximum height to the south of circa 11.5 metres above ground level or similar to the overall height of a two storey pitched roof dwelling.

The main building will not be seen from the public road, however, the main building and cabins will be partially seen from Magheramore beach and from the sea. The buildings shape, materials and texture is designed to integrate and settle in with the landscape.

The proposal will retain existing vegetation along the site boundaries and incorporate further planting along the south, east and north east boundaries.

Interspersed within the new planting will be native Alder and Pine trees which will gain some shelter from the hardy Olearia Traversii and hawthorn until fully established. The guest lodges will be interspersed within these trees and set back so that they will appear visually integrated within the range of trees as viewed from Magheramore beach and the sea. The modest scale and timber finish of the lodges and faceted shape will further mitigate their appearance as viewed from beyond the site.

It is submitted that the proposed development respects the character and visual potential of the coast and seascape and is in accordance with Objective CPO 19.8.

CPO19.8 To protect the character and visual potential of the coast and conserve the character and quality of seascapes.



Figure 16: CGI view of proposed development viewed from the east

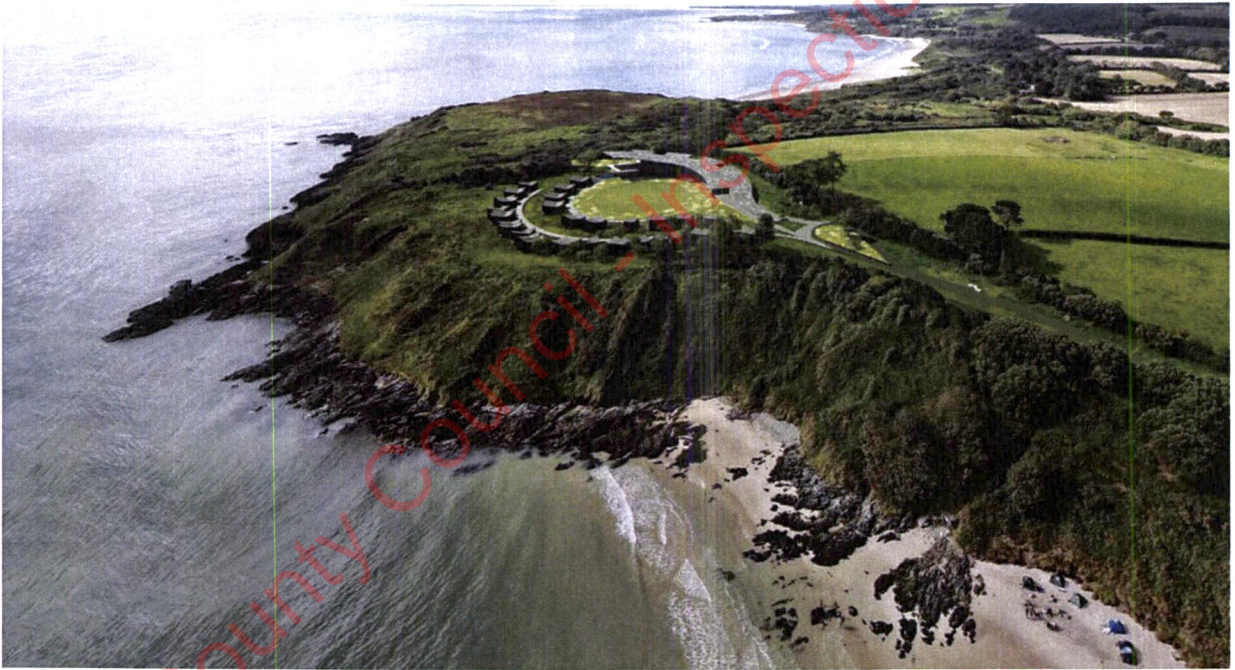


Figure 17: CGI of Aerial view from the north

7 Conclusion

An Integrated Tourism/Leisure/Recreational (ITLR) development constructed in a manner that is consistent with planning policy in relation to the provision of these facilities is a permitted use within the terms of the Wicklow County Development Plan. It is submitted that we have shown earlier in this report, that the ITLR as proposed in this location is consistent with County Plan policy, particularly Chapter 11 (tourism policy) and Chapter 19 (coastal policy).

The proposed development is adjacent to a special area of conservation (SAC) but is proposed in a manner that all construction remains outside the area defined as containing the SAC. The architectural design is respectful of its location and it is submitted the architects have produced a building that will successfully contribute to its environment.

The proposal will not alter the existing public access to the beach. It will remain as today on foot by way of the existing nuns walkway.

A new structure is proposed to be constructed at the north of the site to contain a surfing facility, which is currently being run from a storage container on the beach. It is anticipated that the upgrade of the existing surf facility will be a welcome addition to the beach area.

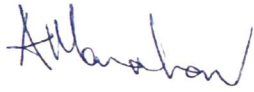
The information and details provided with this application has shown that there is a social and economic need to locate in this area, close to the tourism product that it is based around i.e. the beach, cliffs and environment/ecology.

The proposed development would provide a new type of sustainable tourist accommodation facility for Wicklow County and be a source of long term local employment which will have a positive long term economic and social impact on the local and regional area.

This is an appropriate development that has been thoroughly considered by all the relevant disciplines taking account of the site characteristics of the subject lands and the sensitive nature of the adjoining SAC as assessed in the Natura Impact Statement.

Having regard to the nature, scale and use of proposed Integrated Tourism/Leisure/Recreational (ITLR) facility described within this planning application, the increased demand for tourism accommodation and facilities particularly at this location and the comprehensive schedule of site surveys, engineering reports, ecological and landscape studies and detailed architectural drawings commissioned by the landowner for a sensitively designed integrated development, it is submitted the proposal is in accordance with the tourism, economic, environmental, coastal and development management objectives in the Wicklow County Development Plan 2022-2028 and as such is consistent with the proper planning and sustainable development of the area.

We trust this is to your satisfaction and, having regard to the quality of the proposal, we would request a positive Decision in due course. We trust that the extensive level of detail in the reports accompanying this application will give the Planning Authority comfort in assessing this application.



Manahan Planners

30th March 2023

Wicklow County Council - Inspection Purposes Only!

APPENDIX A

Proposed Access and Operational Document for Magheramore Integrated Tourism/Leisure/Recreational (ITLR) Development

Contents:

- Roadway
- Pathway to beach
- Entrance Mechanism
- Car Park
- Surf Facility
- WC facility
- Access to New ITLR Development
- Restriction of access between site and surrounding areas including SAC

This document has been prepared on behalf of Creatively Pacific Limited who seek planning permission to develop a new Integrated Tourism / Leisure / Recreational (ITLR) facility, to review the existing access to the various locations that currently exist on this site and outline how this is to be both maintained and improved.

Roadway

At present there is public access to the site off the R750 road along Nun's Lane for pedestrians. This laneway allows access to the beach which is to be maintained throughout construction so that public access to the beach remains unaffected. There is a vehicular gate way at the top of the lane which is only accessed by local residents and operatives accessing the farm land that forms part of the site.

Vehicular access is not provided for the public. The intent of this proposed project is to maintain the same access arrangement – Public pedestrian access to beach with existing and future residents to be allowed access by car. Pedestrian access will always take priority.

Pathway to beach

As part of this development, it is intended to upgrade the laneway down to the beach. It is proposed to maintain the public pedestrian access along this laneway. It is also proposed that pedestrian access to the proposed surf facility will be along this laneway. The upgrade of the laneway will take the form of widening it without interfering with the hedgerows either side and providing a new permeable surface. Pedestrians will be given priority above all other means of transport along the laneway.



Entrance Mechanism

It is proposed that guests of the new Integrated Tourism/Leisure/Recreational (ITLR) development will have vehicular access to it by way of the Nun's Laneway. It is intended that there will be a barrier installed at the top of the laneway that will be monitored via camera and intercom by staff within the ITLR development to allow vehicular access only to those residing at the ITLR development. All vehicular use on the laneway will give way to pedestrian use at all times.

CarPark

The carpark proposed within the site is for use by ITLR guests only. The carpark does not form part of the public access route and is not for use by the public. Access to it will be controlled at the proposed barrier off the R750. The surface of the car park will be permeable.

Surf Facility

It is anticipated that the upgrade of the existing surf facility will be a welcome addition to the beach area here. At present there is a surf school operating out of a shipping container. It is proposed to create a permanent facility that will enable the operators to improve their offering. It is intended to provide a surf school/shop facility with changing areas and much needed first aid equipment.

The intent behind the shop is to provide the largest surf, skate and lifestyle brands offering quality globally recognised product to the surf market. Boardriders brands - Billabong, Quiksilver, Roxy, DC, Element and RVCA will be available. It is intended to cater for the essential and useful items for the sea.

Currently the school runs Ocean Awareness, Water Safety and Watercraft (surf boards, Stand up Paddleboards and rescue) training to schools and community groups. Their aim is to expand the Transition Year (TY) offering to schools and offer an educational element to the experience at the school. Schools that use Brittas Bay and Magheramore Surf School include: St Gerard's, East Glendalough, St. Marys Arklow, Carysfort, CCM Wicklow and many youth reach groups.

The provision of upgraded school and shop facilities with changing, shower and WC facilities would greatly improve the experience.

During School holidays they offer kids camps incorporating watercraft training (surfing, Stand up Paddle boarding, rescue), ocean awareness, teaching kids about rip currents, tides and tidal currents, wind direction and the safety of going on the water in certain conditions, how to maintain your equipment and ride correctly with safety techniques should you get into difficulty (for example SUP (stand up paddleboard – self rescue), offshore winds and the dangers associated, areas to launch your surf craft correctly).

Every September they operate a 4 week surfing and ocean awareness programme for Open Spectrum (kids from age 8-16 with Autism). Their surfing programme is a very popular activity for the kids and a favourite each year.

Having these facilities and first aid equipment would be of huge benefit to Magheramore Surf School and greatly benefit Wicklow and the businesses in the area.

The first aid station will include a defibrillator which is a vital, lifesaving piece of equipment, particularly in areas such as this where emergency services have to travel from a distance should there be an emergency, as well as a rescue surf board on site.

Brittas Bay and Magheramore Surf School feel the development would be very beneficial for the community and the surf school and have outlined the below:

Benefits of Surf Facility:

1. Improved surf building and facilities for changing - a much more enjoyable experience especially during the colder months when they are usually forced to close.
2. Small Surf Shop stocking essential surf items - wax, leaches, wetsuits etc. This will benefit local and visiting surfers.
3. Capability to expand our offering to the local community utilising the beautiful coastline -for example Coaststeering and Kayaking at the beach as well as coastal tours including educating people about the seaweed life, coastal erosion and much more.
4. Opportunity to offer the community based events and talks with a structured building and facilities - e.g. swim meets, water safety, lifesaving and surf rescue.
5. Better safety and a cleaner beach.
6. They would also like to hold regular beach cleans and ensure the area is kept clean and to the highest standards.
7. Improved First aid facilities at the beach - currently there is only a lifeguard when they are teaching at the beach and no access to first aid.

They pride their business on offering a community experience with families and parents enjoying the area and the school - such a development would make it even more appealing and pleasurable for all involved.

WC facility

There is a new set of WCs proposed to be positioned beside the Surf Facility. At present there are no sanitary facilities available on or near the beach. The introduction of this facility will enhance the amenity significantly. The WCs will be physically attached to the Surf Facility but will not form part of the Surf Facility Operation. They will be used by the surf facility and can be used by members of the public on a controlled basis. It is proposed that the WCs will be maintained by the staff of the ITLR development who will maintain the WCs and keep them stocked & clean. The effluent from the proposed WCs will be processed through the overall WWTP designed to cater for the ITLR development.

Access to New ITLR Development

Access to the new ITLR development will be restricted to staff and residents. Only staff and residents will be allowed vehicular access off the R750 and access to the car parking provision mid site. The access to the ITLR development which is positioned away from the public pedestrian access, surf facility and WCs will be controlled by the management of the ITLR development as it is private property.

Restriction of access between site and surrounding areas including SAC

At present there are ongoing issues with the public accessing the private farmland within the site as well as using this site to access the upper environs of the SAC and neighbouring farmland. There have been several episodes of interference with boundary fences and anti social behaviour to do with the public accessing private lands. The public accessing the upper parts of the SAC also has detrimental effects on these areas as outlined in the report conducted by Enviroguide. It is proposed as part of this development that the boundary treatments will be enhanced and monitored to maintain the property of surrounding neighbours while allowing the pathways of existing wildlife to be maintained. At the top of the SAC it is proposed to incorporate a timber fence to restrict both the public and guests of the ITLR development from accessing the SAC area.

Conclusion

The above operational points are made to show that the proposed development will enhance significantly the amenity that is Magheramore beach while maintaining the public access to the beach in a better manner to existing, providing much needed sanitary services and defibrillator for public use, enhancement of a well regarded surf facility for the area and the maintenance of a unique and interesting ecosystem containing wildlife and Tufa springs which are fed from a complex hydrogeological system.