P. Coleman & Associates

Planning Response Report To An Coimisiún Pleanála ACP-323742-25 – Proposed Extension to Drumcliff Burial Ground, Ennis, Co. Clare

Client: Clare County Council
Project Number: 7421
Issue: A

Document Sign Off

CURRENT ISSUE			
Issue No:	**Date:** 19.2.26	**Reason for issue:** Response to third party submissions	
Sign Off	**Originator**	**Checker**	**Approver**
Print Name	Mandy Coleman	Jackson Coleman	Mandy Coleman

PREVIOUS ISSUES					
Issue No	**Date**	**Originator**	**Checker**	**Approver**	**Reason for issue**

1. Introduction and Context

P. Coleman & Associates (PC&A), in consultation with Clare County Council (CCC) and the project team, submits this Planning Response Report in response to An Coimisiún Pleanála's (ACP) letter dated 13 November 2025 inviting comments on the six observations received in respect of the above application under Section 177AE of the Planning and Development Act 2000 (as amended). ACP's letter requested a response within four weeks and, following a request for an extension of time, an extension was granted to allow submissions up to 20th. February 2026.

CCC and the project team have carefully reviewed each observation. The matters raised have been comprehensively addressed by the project team and the appointed specialist consultants by way of the enclosed response notes. These specialist notes are confined strictly to the issues arising from the observations received. No new reports or supplementary technical material are submitted as part of this response.

The following documents are enclosed with this Planning Response Report:

- P. Coleman & Associates (PC&A) – Civil Engineering Response dated 18th. February, 2026
- Hydro-Environmental Services (HES)– Response to Observations (29th. January 2026)
- Risteard Ua Cróinín – Archaeological Response Note (5th. February 2026)
- Altemar Ltd – Ecological Response (19th. February 2026)
- Letter from CCC dated 20th. February, 2026

In accordance with ACP's request, a copy of this submission and the enclosed response notes will be made available for public inspection at the offices of Clare County Council.

This response is confined strictly to the issues raised in the submissions received (Robert Behan, Pat Tierney, Dermot Queally, Development Applications Unit (DAU), Uisce Éireann (EU) and Michael Duffy). A copy of the response and the enclosed specialist notes will be made available for public inspection at the offices of Clare County Council, in accordance with the Commission's request.

This application is essential public infrastructure required to fulfil a clear statutory duty under Sections 160, 172 and 173 of the Public Health (Ireland) Act 1878. Drumcliff Burial Ground is the principal county facility serving Ennis and the wider county. The current operational section (Section E – St. Brigid's) is projected to reach capacity within less than two years. Without this extension, CCC will be unable to meet its legal obligation to provide adequate burial space for the people of Clare. The public interest in granting approval is therefore compelling and urgent. Enclosed with this response is a letter from Clare County Council further outlining the necessity and urgency of the proposed development.

2. Rationale for Proposed Development

Drumcliff Burial Ground is the designated Clare county burial ground and serves a large and growing population within the Ennis Municipal District and the wider county. The current operational section (Section E – St. Brigid's) is nearing full capacity and is projected to be exhausted within approximately 18–24 months. The proposed extension will provide circa 413 double plots (826 single plots), together with ash plots and columbarium niches. This quantum of provision is required in order to maintain adequate burial capacity and continuity of service for the coming decade.

CCC's statutory duty to provide and maintain burial facilities is long-established and non-discretionary. In the absence of the proposed extension, CCC will not be in a position to meet this obligation, with serious and immediate consequences for families at a time of bereavement. The proposed development is therefore essential public infrastructure, consistent with the proper planning and sustainable development of the area, and the public interest in its delivery should be afforded significant weight in the Commission's determination.

3. Summary of Observations and Reponses

The six third party observations fall into four principal themes. Each theme has been examined in detail by the relevant specialist consultant and is addressed in the attached responses. The responses are robust, site-specific and fully supported by the original documentation and assessments submitted with the original application.

Theme / Issue	Observer(s)	How Addressed	Specialist Response Attached	Key Outcome
Surface Water Drainage & Flooding (public road & adjacent lands)	Behan; Tierney; Queally	Dedicated Civil Engineering Response Note confirming full on-site attenuation via SuDS, 5 BRE-compliant soakaway tests, French drains and ACO channels.	Jackson Coleman, P. Coleman & Associates (PC&A)	Zero increase in runoff. Post-development flows ≤ greenfield rates. Maintenance secured by condition. The 2020 trial-hole campaign confirms suitable clay subsoils across the extension area.
Groundwater Protection, Karst & Potable Water Supply (Drumcliff Spring, contaminants, leachate, conduit claims)	Úisce Éireann; Duffy	Full technical review of all points in the original HES Assessment. Updated response addresses all 4 Úisce Éireann queries and the 27 points raised by Mr Duffy.	Hydro-Environmental Services (HES) (29 Jan 2026)	8.5–13.5 m low-permeability boulder clay confirmed by trial pits and geophysics. No karst features under the site. Assessment follows DAERA NI 2019 and UK EA guidance. Recent EPA 2010–2025 data confirms low nitrates/ammonia. Imperceptible residual effect on the PWS.

Theme / Issue	Observer(s)	How Addressed	Specialist Response Attached	Key Outcome
Archaeology (insufficient baseline, need for geophysics & test trenching)	Development Applications Unit (DAU)	Full acceptance of DAU recommendations. Commitment to comprehensive pre-commencement AIA.	Risteard UaCróinín (5 Feb 2026)	Geophysical survey + targeted licensed test trenching. Preservation in situ preferred. Stop-work protocol and full integration into CEMP. Secured by condition.
Ecological & Natura 2000 Issues (bats, SAC/SPA connectivity, WFD, potable source)	Duffy	Review of all ecological points. Confirmation that NPWS (via DAU) raised **only** archaeology.	Altemar Ltd (Bryan Deegan, 19 Feb 2026)	No ecological issues raised by any other observer. No lighting or tree removal proposed → no bat impacts. NIS fully addresses potential indirect effects on Ballyallia Lake SAC and Ballyallia Lough SPA with mitigation secured by condition. No pathway to significant effects.

3.1 Surface Water Drainage & Flooding

Concerns relating to flooding of the public road and adjoining lands, and the adequacy of the proposed drainage/soakaway design, were raised in the observations from Robert Behan, Pat Tierney and Dermot Queally.

These matters are addressed in the Civil Engineering Response prepared by PC&A, which confirms that the drainage design for the proposed burial ground extension has been developed in accordance with SuDS principles and the objectives of the Clare County Development Plan 2023–2029 (including Objective CDP2.11(c)), to ensure that stormwater generated within the development is appropriately managed on-site. The drainage strategy provides for infiltration of rainfall over green/grave areas, with footpaths graded to direct runoff to adjacent green areas where possible. Surface water from impermeable footpath areas is to be intercepted via ACO drainage channels and directed to soakpits. In addition, surface water from the proposed internal roadway is to be managed by a French drain incorporating a land drain pipe, with a soakpit provided at the lowest point of the drainage run to accommodate heavy flows in excess of that which can be absorbed by the drain itself. The main pedestrian access ramp/stairs (non-porous finish) and the gully serving the existing/proposed roadway junction are also to discharge to a soakpit.

PC&A Response confirms that the sizing and capacity of the soakaway/soakpit system has been informed by trial pitting and five no. BRE Digest 365 compliant soakaway tests**,** and that the soakaways have been sized by a competent consulting engineer to accommodate runoff from the proposed extension. The drainage system is to be managed and maintained for the operational life of the development, with routine inspection/cleaning of SuDS features to ensure ongoing performance; a planning condition ensuring this can be attached.

Hydro-Environmental Services (HES) response (29th January, 2026) have also considered the flooding matters in the context of the overall hydrological and hydrogeological assessment for the site. HES confirm that the proposed surface water strategy and the underlying site conditions (including the thickness and low permeability of the overburden) have been fully factored into the assessment, and that the proposal will not increase runoff or give rise to adverse hydrological impacts off-site. In combination, the civil engineering design and HES assessment confirm that there is sufficient capacity within the proposed drainage strategy to prevent surface water runoff from the site and that the proposed development will not exacerbate flooding of the public road or adjoining lands.

3.2 Groundwater Protection, Karst & Potable Water Supply

Concerns relating to groundwater protection, karst vulnerability and the protection of the Drumcliff Spring / Ennis Public Water Supply were raised in the submissions from Mr Michael Duffy and Úisce Éireann (UE). These matters are addressed in the HES response, which provides a consolidated hydrology/hydrogeology reply to both submissions.

In relation to Mr Michael Duffy's submission, HES confirm that the hydrology/hydrogeology issues raised (including alleged karst/conduit connectivity, claimed groundwater pathways to Drumcliff Spring and concerns regarding potential contaminant migration) are addressed by reference to the site-specific investigation data and the conceptual site model prepared for the development. HES confirm that the intrusive investigations and geophysical survey identify a substantial protective overburden of glacial boulder clay (circa 8.5–13.5m) across the site and that no karst features were observed or interpreted beneath the proposed extension area. HES also note that the separation distances to relevant receptors are maintained, including separation from the Drumcliff Spring abstraction point. On this basis, HES conclude that the claimed direct conduit connection and associated risk pathway asserted in Mr Duffy's submission are not supported by the investigation findings, and that the proposed development will not give rise to significant adverse effects on groundwater or the Drumcliff Spring / Ennis Public Water Supply.

In relation to UE's submission, HES confirm that the scope and methodology were agreed through consultation with UE, that the approach follows established guidance (including DAERA NI 2019), and that updated EPA groundwater monitoring information (2010–2025) has been reviewed. An appendix is also provided containing photographs referenced to the existing trial pit logs, included solely to address UE's documentation request, and it does not comprise a new or supplementary report or change the conclusions of the submitted assessment.

Overall, HES conclude that the proposed development will not give rise to significant effects on groundwater and that the residual effect on the Drumcliff Spring / Ennis Public Water Supply is imperceptible.

3.3 Archaeology

Heritage and archaeology matters were raised in the submission from the Development Applications Unit (DAU), having regard to the archaeological sensitivity of the area and the proximity of recorded monuments, including the church, graveyard and round tower. The DAU note that while a desk-based Archaeological Impact Assessment (AIA) was submitted with the application, they consider that the baseline archaeological environment has not been adequately characterised to allow for an informed archaeological recommendation, and they advise that further pre-development investigation should be required.

These matters are addressed in the Archaeological Response prepared by Risteard Ua Cróinín (5 February 2026), which confirms that the DAU observations are acknowledged and accepted. CCC commits to a comprehensive programme of pre-commencement archaeological works which can be subject to planning condition should ACP consider it appropriate: engagement of a suitably qualified archaeologist to complete an AIA in advance of any enabling/site preparation works; an archaeological geophysical survey to inform the design of targeted intrusive investigation; and a programme of licensed test trenching/test excavation at locations selected by the archaeologist, informed by the survey results and the development layout.

The Archaeological Response also confirms that statutory compliance procedures will be followed where works are proposed in proximity to protected archaeological monuments, including any necessary Ministerial consent/notification and licensing requirements, and that preservation in situ will be the preferred mitigation approach where archaeological remains are identified. A stop-work and consultation protocol will apply if archaeology is encountered during investigative or enabling works, pending agreement of appropriate mitigation measures with the relevant authorities. Reporting (including an archaeological impact statement/mitigation strategy and post-excavation reporting where relevant) will be completed and submitted as required, and the archaeological measures and constraints will be integrated into the Construction Environmental Management Plan for all phases of the development.

3.4 Ecology & Natura 2000

Ecology and Natura 2000 matters were raised by Mr Michael Duffy, including issues relating to bats, potential disturbance/lighting effects, alleged hydrological/ecological connectivity to designated sites, Water Framework Directive (WFD) considerations, and the potential for indirect effects on European Sites. These matters are addressed in the response prepared by Altemar Ltd (19th. February 2026), which provides a detailed, comprehensive reply to Mr Duffy's submission and addresses each of the issues raised.

Altemar confirm that no ecological concerns were raised by any other observer or prescribed body in respect of the proposed development and that the DAU submission relates to archaeology matters only which have been addressed by Risteard Ua Cróinín. Altemar note that the proposed works are confined to the burial ground extension and associated internal works, with no requirement for tree removal or vegetation clearance that would give rise to habitat loss or fragmentation. In addition, no public lighting is proposed as part of the development. On this basis, Altemar conclude that there is no mechanism for direct disturbance to bats or bat commuting/foraging habitats, and no bat-specific impacts are predicted.

In relation to designated sites, Altemar confirm that the submitted Natura Impact Statement (NIS) has assessed the relevant European Sites, including Ballyallia Lake SAC and Ballyallia Lough SPA, and has considered the potential for indirect effects (including via surface water /groundwater pathways and during construction). Altemar confirm that the mitigation measures set out in the application documentation, including construction management measures and controls on runoff/silt, are appropriate and can be secured by condition. Having regard to the nature and scale of the development, the separation distances to sensitive receptors, and the mitigation proposed, Altemar conclude that there is no pathway for likely significant effects on European Sites, either alone or in combination, and no significant residual ecological effects are predicted.

Altemar also address Mr Duffy's wider ecological assertions (including WFD-related comments and linkage to water supply concerns) and confirm that, when considered alongside the HES and civil engineering responses, the submitted assessments demonstrate that the proposal will not give rise to significant adverse effects on the receiving environment.

4.0 Conclusion

CCC, in consultation with the project team, has carefully considered each of the six observations received. The issues raised fall under four principal themes: (i)surface water drainage/flooding, (ii)groundwater/karst and potable water supply, archaeology, and ecology/Natura 2000. Each theme has been addressed by the relevant specialist consultant response notes, confined strictly to the matters raised in the observations.

Having regard to the clarifications and commitments set out in the enclosed responses, the Council is satisfied that the proposed development will not give rise to unacceptable impacts on the public road or adjoining lands, will not adversely affect groundwater or the Drumcliff Spring / Ennis Public Water Supply, can be appropriately managed from an archaeological perspective, and will not result in likely significant effects on European Sites. Where appropriate, the recommended mitigation and management measures can be secured by condition.

The proposed development is essential public infrastructure required to meet CCC's statutory obligation to provide adequate burial facilities. Drumcliff Burial Ground is the designated county burial ground and the current operational section is nearing capacity. In these circumstances, Clare County Council respectfully requests that ACP approve the proposed development.