

Project Address: Proposed Development for 94 Dwelling Units at lands 150m North of the N55, Lissywollen, TD, Athlone, Co Westmeath.

Project Reference: 127

Issue Date: 06/03/2026

Prepared by: Housing Capital, Westmeath County Council, Civic Offices, Athlone, Co. Westmeath

Response to submissions received from An Taisce.

Re: Part 10 Planning Application – Proposed Development of 94 Dwelling Units at Lands 150m North of the N55, Lissywollen TD., Athlone, Co. Westmeath

In the response below, the WCC will attempt to address and allay the concerns raised by An Taisce. These matters and concerns will be addressed in a thorough and methodical manner.

Submission:

Re: Part X Planning Application. Proposed Development of 94 Dwelling Units at Lands 150m North of the N55, Lissywollen TD., Athlone, Co. Westmeath.

A Chara,

We thank you for referring the above application to An Taisce for comment.

1. Permeability

Despite the now widely recognised need to reduce car dependence as part of our efforts to address the climate and biodiversity crises, there is an ongoing systemic failure to ensure that new housing developments are actually linked to safe cycling and walking routes to schools, local services, employment centres, recreation areas, and enhanced public transport in the satellite commuter housing areas. This renders these areas unsafe for walking and cycling to schools, local services and amenities.

Residential schemes often include strong walking and cycling permeability within the boundary of the site itself, but they are frequently located on the fringes of cities and towns at a significant remove from existing transport links or services (grocery stores, health facilities, etc.). They are also often sited in areas with very limited existing public transport routes and capacity or pedestrian and cycling infrastructure.

Therefore, although a new residential development may provide high quality foot and cycle permeability around the dwellings, these often terminate immediately outside the site boundary, thereby discouraging from using active travel modes outside of the development itself and thereby increasing car dependence.

It should be ensured that the subject proposal's design adheres to the need to promote a modal shift towards increased pedestrian, public transport and cycle friendly development, in adherence to the

National Sustainable Mobility Policy and the Compact Settlement Guidelines. Access to public transport links and cycling/pedestrian infrastructure outside the subject site boundary is a crucial consideration.

With regard to permeability, the Council should have regard to the NTA's guidance which emphasises how permeability contributes to the attractiveness of a neighbourhood. The proposal should also demonstrate adherence to CPO 16.25 within the Westmeath County Development Plan 2021/2027 which specifies the following:

"New development proposals should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to give a competitive advantage to these modes for local trip making.

Where possible, new residential/ developments should provide for filtered permeability, i.e. provide for walking, cycling, public transport and private vehicle access while restricting or discouraging private car through trips."

Furthermore, close consideration should be given to the Design Manual for Urban Roads and Streets (DMURS) to ensure that the project is DMURS compliant, particularly as regards permeability where Design Principle 1 and subsequent elaboration states the following:

" To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport. (p. 29)

When designing new street networks, designers should implement solutions that support the development of sustainable communities. In general such networks should:

Be based on layouts where all streets lead to other streets, limiting the use of cul-de-sacs that provide no through access.

Maximise the number of walkable / cyclable routes between destinations. (p. 41)"

It should also be ensured that the principle of transit-oriented development is embedded into the design of the proposal to tackle car dependency and facilitate sustainable mobility.

Response:

The majority of the proposed development site is within the 500m radius pedestrian catchment for the local Neighbourhood Centre, as per the Cornamaddy Action Area Plan– 2005.

The proposed development offers a strong walking and cycling permeability within the boundary of the site, where the generous footpaths are combined with raised 'table top' junctions to provide traffic calming measures and safe pedestrian zones that allow the footpaths and cycle paths to connect to the north south active travel route and provide various routes for cycling and walking within the site boundary.

The closest bus stop to the site (Stop ID: 455971) for buses travelling into town is located approximately 500 meters to the south of the site along the N55 and is served by the A2 Bus Eireann route which offers connections to Bealnamulla in Roscommon. The Bus Eireann A2 route with runs every 20mins which links the proposed site to the town centre / the Athlone Bus Station. The site also benefits from nearby transport links. The site is well served by a number of reasonably frequent bus services departing from Athlone bus station approximately 2km to the southwest of the site offering the following services: • Route 72 to Limerick Train Station

- Route 70 to Green Bridge • Route 440 to the Rail Walk • Route 461 to Roscommon • Route 466 to Longford • Route 73 to Waterford City • Route 70 to Mullingar • Route 65 to Kilnacloy.

The design team consulted the Westmeath County Council 'Active Travel' team when considering the cycle and pedestrian access routes. The proposed development will connect to and extend the Westmeath County Council active travel 'route D'. Please refer to the design report and site plan which clearly sets out the proposed extension of active travel routes through the site, these routes reinforce the proposed development sites safe cycling and walking routes to local facilities such as, the greenway, public transport, schools, local services, employment centres, recreation areas. Furthermore, the proposed 94 housing units are considered an infill development in an outer suburban area, this proposal will extend and reinforce the safe walking and cycling access as it will act as a pedestrian / cycling link to the existing developments on the north-east outskirts of the town.

The proposed site will reduce car dependency as the local the local facilities and public transport is on the edge of the development site located on the N55 as it is within the 10min cycle distance from the town centre, see figure 1 below from 'www.commutetimap.com'. This excerpt below shows that the proposed site (centre of site shown with a red dot) is within the recommended 10minute cycle area from the town centre, and has close proximity to the public transport, greenway and local schools, local retail and services.

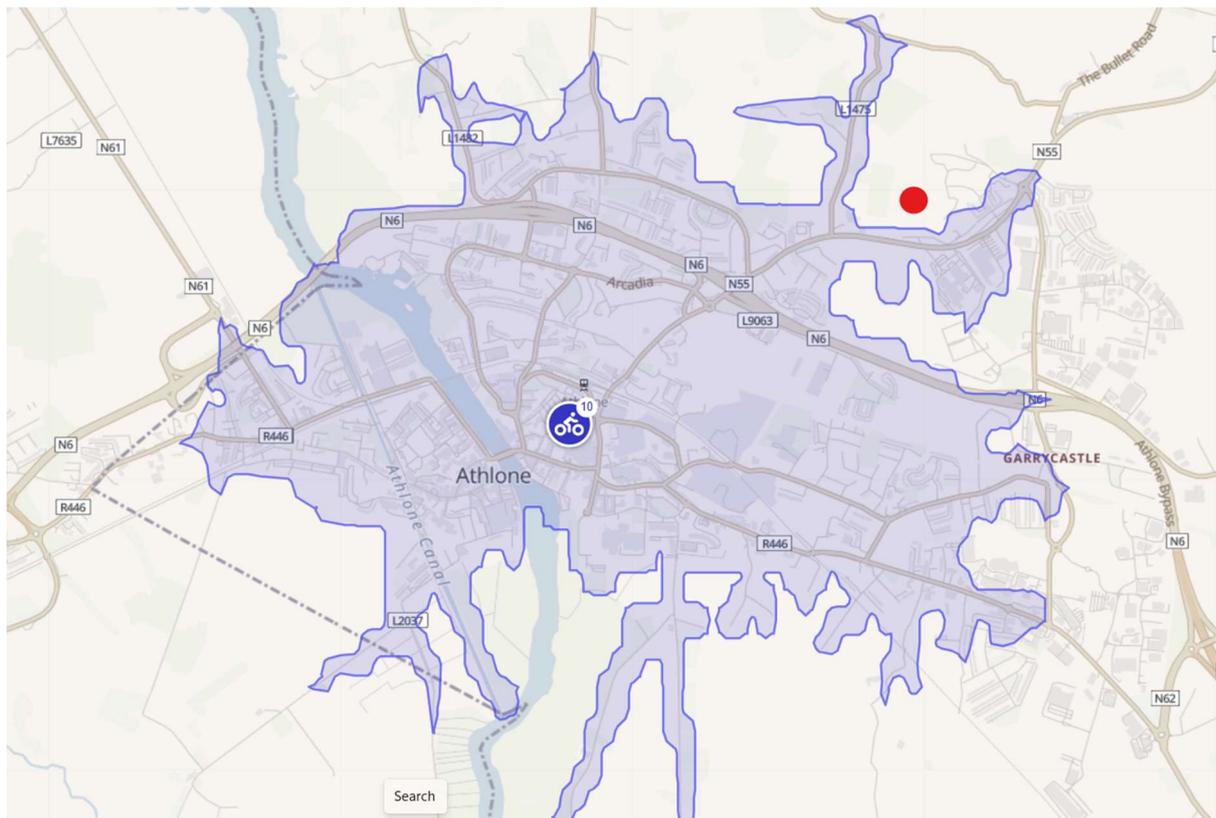


Fig 1- 10 minute Cycle distance, Source : commutetimap.com

The local retail centre which is within a 10min walk from the proposed site, which offers 1no. Supermarket, 1no. opticians & no.1 audiologist, 1no.DHL service point locker, 1no. Pharmacy, 1no. Barber shop and 1no. coffee shop. There is also 1no. Hairdressers on the Coosan road which is within a 15min walk of the proposed site, and a refuelling station and spar shop within 6minutes walk from the proposed site.

Please see below an excerpt below from the Department of Housing, Local government and Heritage (DHLGH) Assist Editor tool) which shows the local retail services within walking distance of the proposed site.

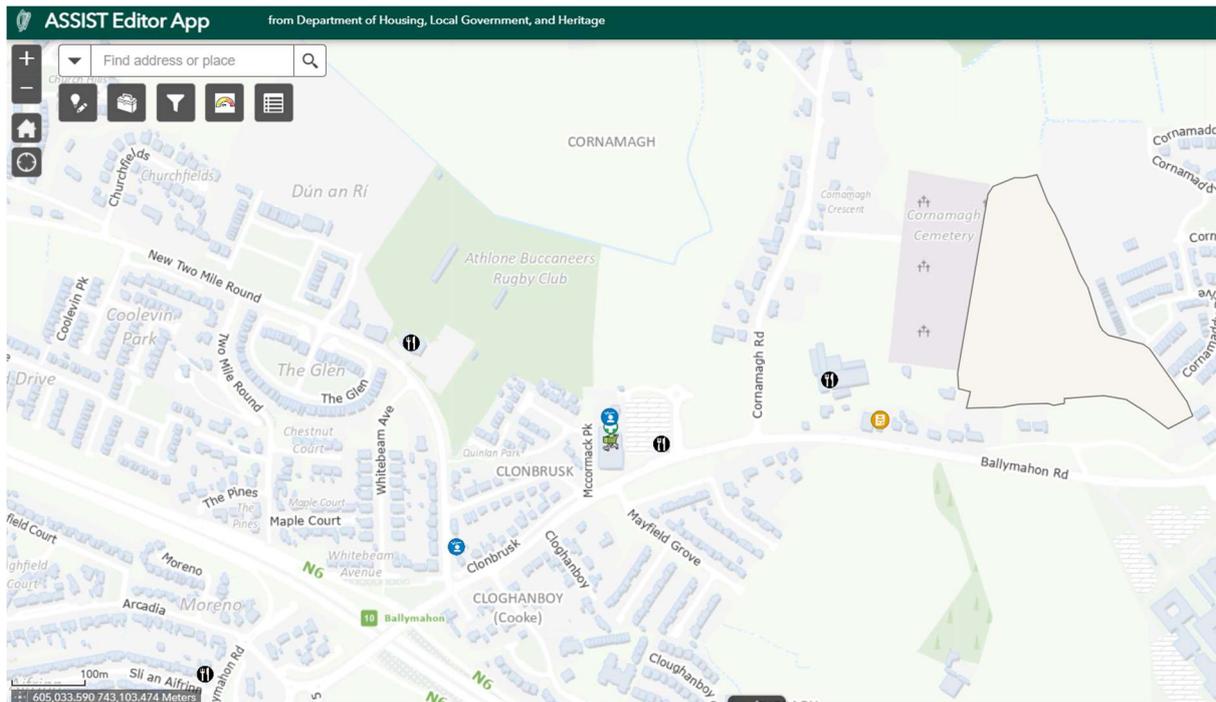


Fig 2 - location of local services in close proximity to the site, Source: Assist Editor App

The WCC reaffirms that the proposed project is compliant with the *Design Manual for Urban Roads and Streets (DMURS)*, and the *NTA Permeability Best Practice Guide (2013)* and we would emphasise that the proposal aims to encourage walking and cycling. A DMURs report is included in the design report for the proposed development.

2. Artificial Lighting

It is submitted that the applicant's external lighting specifications should be assessed with regard to the following important lighting design considerations, as specified by Dark Sky Ireland³:

- Colour temperature (less than 2,700 Kelvins),
- Light distribution (luminaire's beam less than 80 degrees),
- Illuminance (less than 5 lux for pedestrian and decorative surfaces),
- Luminance (100 cd/m² or less),
- Colour rendering index (CRI) (exterior lighting should not exceed CRI Ra90), Energy efficiency (40 lumens per watt or greater).

A dimming regime in the evening time should also be considered. Embedding these lighting design specifications within the subject proposal would contribute to reducing light pollution effects on nocturnal wildlife, including essential pollinators, human health and the night sky.

Artificial light is recognised as a major threat to biodiversity due to disturbance to biological functions such as melatonin production and circadian rhythms, including bats. It is recommended that the lighting plan for the project be assessed with regard to guidance from EUROBATS 8 Guidelines for Consideration of Bats in Lighting Projects.' It should be ensured that disturbance to bat species is minimised as much as possible in lighting design considerations.

See JAK consulting response below:

- *Colour temperature (less than 2,700 Kelvins).*

CCT of LEDs in design 2700K. The lighting levels will be revised to 2200k, please note: that this comes at the cost of efficiency so we will need to increase the power output to compensate for the loss.

- *Light distribution (luminaire's beam less than 80 degrees).*

Some of the optics in the design will be changed to meet this requirement (specifically the R01 optic). This will likely result in the need for some additional poles & fittings.

- *Illuminance (less than 5 lux for pedestrian and decorative surfaces).*

The current proposal was designed to class P4 (5 lux **average**, 1 lux minimum). Any changes required will be addressed in the design.

- *A dimming regime in the evening time should also be considered.*

Fittings can be programmed to any dimming regime.

- *Colour rendering index (CRI) (exterior lighting should not exceed CRI Ra90), Energy efficiency (40 lumens per watt or greater).*

Fittings used CRI 70. 108lm/w.

“3. Social and Community Infrastructure

It is recommended that a Social and Community Infrastructure Assessment should be carried out to determine the sufficiency of existing community infrastructure to meet the addition at demand generated by the subject proposal, as well as shaping plans for future community infrastructure if deficiencies are identified. Proper provision of community and social infrastructure in tandem with housing is essential for building sustainable and properly planned communities.

The Council should also draw upon the concept of the '15 minute city' to ensure compact settlement within walking and cycling range of local services, amenities and access to public transport. As noted in the Compact Settlement guidelines (2024, Section 1.3.2, p. 4):

'This should be the overarching objective when planning for sustainable residential development and compact settlements. Planning Authorities at settlement level should plan for an integrated network of well-designed neighbourhoods that can meet day-to-day needs (such as food, healthcare, education, sports and professional services) within a short 10 to 15 minute (approx.) walk of all homes, In the case of larger settlements, the residents of less central neighbourhoods should have opportunities to travel by public transport and other sustainable modes (e.g. greenways) to access higher order services, employment and amenities at more central and accessible locations. This will reduce the need for travel and the need for travel by private car, supporting the transition to a lower carbon society and the creation of settlement & that are more socially inclusive. [An Taisce emphasis].”

Response:

As per the design statement submitted with the application documents and as per the response to the paragraph/ section 1 (Permeability) above.

Also please refer to section 3.5.1 of the Transport Statement (submitted with the application documents) Westmeath County Council is confident that the existing local facilities can accommodate the additional demand generated by the proposed development.

4. Climate Action

We would emphasise the importance of commitment by the developer to low-carbon measures and technologies, including heat pumps, solar panels, fabric efficiency upgrades and the provision of EV charging infrastructure. This will further the proposal's contribution to delivery of the national climate objective for a climate resilient,

biodiversity rich and climate neutral economy by 2050, as specified in s.5(3)(1) of the Climate Action and Low Carbon Development (Amendment) Act 2021. As noted by the Climate Change Advisory Council in their recent Cross-sectoral Review (2025):

“Research indicates that co-adoption of low compact technologies, such as pairing solar PV with electric vehicles (EVs) or heat pumps, yields greater cost savings and emissions reductions and will be essential to achieve climate objectives.”

Response:

The DHLGH climate action roadmap 2024 outlines clearly that all new dwellings constructed under the ‘Housing for All’ programme are “Nearly Zero Energy Buildings” (NZEB) which means most new dwellings now have a minimum A2 BER rated external envelope and renewable energy heating systems such as heat pumps and solar panels, additionally each dwelling will have access to either private or shared Electric Vehicle charging points.

“By reducing land take and infrastructure sprawl, compact settlement can significantly cut embodied carbon due to the significant carbon footprint of external areas such as roads, footpaths and green spaces in residential development. Such emissions due to landscaping and infrastructure are highest for low density semi-detached housing (+32%) compared to duplex unit (+19%) and apartment buildings. A full lifecycle assessment of emissions embodied in construction materials and low-carbon material sourcing is an important consideration when assessing residential development proposals, in order to adhere to the residential sectoral emissions ceiling and the Climate Action and Low Carbon Development Act 2021 (as amended).

We would highlight the Traffic Light Tool, developed by the RE-CUGI project which allows for an assessment of a development proposal against low-carbon and compact urban growth requirements. ⁷The criteria for this assessment tool (site location, layout, car parking, walls, roofs, density) has been derived from the Viable Homes Handbook.⁸ This highlights how *“In the case of a typical greenfield development, infrastructure adds approximately 30% additional embodied carbon per dwelling.”*

Response:

Please refer to the design statement submitted with the application documents and also to the response provided in paragraph 1. Above which refers to the DHLGH’s Assist Editor App, which provides the required information..

Also please refer to section 3.5.1 of the Transport Statement (submitted with the application documents) Westmeath County Council is satisfied that the existing local facilities can accommodate the additional demand generated by the proposed development.

The site is within a 10minute cycle from the town centre and a 10minute walk from the local retail centre and local spar shop.

“5. Hedgerow and Tree Retention

We would recommend that existing trees and hedgerows on site should be retained in the first instance to preserve existing biodiversity and ecosystem services such as flood attenuation, carbon sequestration and wildlife habitat provisioning. It is highlighted that the proposal should demonstrate adherence to CPO 12.37-12.47 with regard to tree and hedgerow preservation. This would also satisfy Article 10 of the Habitat Directive which specifies the following:

“Member States shall endeavour, where they consider it necessary, in their land-use planning and development policies and, in particular, with a view to improving the ecological coherence of the Natura 2000 network, to encourage the management of features of the landscape which are of major importance for wild fauna and flora,

Such features are those which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems for marking fie/d boundaries) or their function as steppingstones (such as ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species. [An Taisce emphasis].”

Response:

Please refer to the design statement submitted with the application documents and also the Arborist report and tree protection plan, which clearly outlines that:

“The proposed development has been planned based on the retention and protection of the existing mature trees and hedgerows by forming the mix of detached, semi-detached, terraced houses, maisonettes, and 2–3-storey duplex apartments into courtyard arrangements around and adjacent to the trees to protect the natural environment, flora and fauna, and habitat resources.”

6. Bird Surveys

The sufficiency of wintering bird surveys conducted by the applicant should be demonstrated, given that potential habitat was surveyed on site. This should seek to account for the full diversity of birds with potential to utilise existing habitat for foraging, roosting and nesting activity. This is important in light of the proximity of Lough Ree SPA (site code: 004064) from the proposal (approximately 1.5 kilometres to the northwest). This SPA also includes breeding birds, notably nationally important populations of Common Scoter and Common Tern. Consequently, it should be ensured that a survey has been conducted across the appropriate seasons and for a sufficient duration to account for potential breeding bird activity within the subject site associated with the nearby SPA.

It should be ensured that the requirements of Article 4 of the Birds Directive, with regard to taking appropriate steps to avoid the deterioration of habitats or any disturbances affecting the birds within an SPA, including outside of the strictly delineated functional area, are satisfied in this proposal.

Article 4(4): "In respect of the protection areas referred to in paragraphs 1 and 2, Member States shall take appropriate steps to avoid pollution or deterioration of habitats or any disturbances affecting the birds, in so far as these would be significant having regard to the objectives of this Article. Outside these protection areas, Member States shall also strive to avoid pollution or deterioration of habitats."

In Case C-418/04 Commission v Ireland, the CJEU ruled that Ireland had failed to make serious or sufficient efforts to avoid pollution or deterioration of habitats outside of SPAS for the protection of birds (so called ex situ habitats and species)

"179. Although the second sentence of Article 4(4) of the Birds Directive does not require that certain results be achieved, the Member States must nevertheless make a serious attempt at protecting those habitats which lie outside the SPAS. It is thus clear, in the present case, that Ireland must endeavour to take suitable steps to avoid pollution or disturbance of the habitats."

As a result, the proposal should demonstrate the rigour of bird surveys, associated impact assessments and mitigation measures.

Response:

Please refer to the Ecological Impact Assessment (ECIA) submitted along with the application documents, which contains the relevant Winter bird survey prepared submitted with the application documents which states the following:

*“A Natura Impact Statement (NIS) in support of the Appropriate Assessment (AA) process was undertaken to determine whether the proposed development, alone or in combination with other plans or projects, is likely to result in significant effects on Natura 2000 sites, in view of the sites Conservation Objectives. A total of No. 13 Natura 2000 sites were identified within a 15 km radius of the proposal, as listed in **Tables 4.1 and 4.2** above. For further information, refer to the NIS report (CAAS, 2024), which accompanies the planning application for the proposed development.*

*Based on the findings of the assessment, it is considered that upon the application of the appropriate mitigation measures, the proposed development will not adversely affect the integrity of the Natura 2000 sites within the study area. This conclusion applies to the construction and operation stages of the proposed development. None of the SCI's of the Lough Ree SPA and SAC were recorded during the site walkover in May 2025. In previous bird surveys at the proposed development (CAAS, 2024), no SCI's utilised the site for ex-situ foraging. A single whooper swan (*Cygnus cygnus*) was recorded in December 2023 but this was just seen flying over. Similarly, black headed gulls (*Chroicocephalus ridibundus*) (maximum of 5) which are an SCI of the middle Shannon callows SPA (004096) was recorded flying over in December 2023 and February 2024 (CAAS, 2024). However, no aspect of the proposed development will impact on commuting by these species. Similarly, in the surrounding lands, breeding and winter bird surveys conducted prior to the ongoing development, found that no SCI waterbird species of Lough Ree SPA (004064) and the Middle Shannon Callows SPA (004096) utilised the site lands (Enviroguide, 2023). Mitigation measures to limit potential impacts on the qualifying features of Natura 2000 sites are detailed in the accompanying NIS report prepared by CAAS, 2024.”*

If you would like to review the earlier the AA screening report and Natura Impact statement with Winter Bird survey, this can be provided on request as further information.

7. Water Framework Directive

There is a need to determine the potential presence of drainage ditches which may act as a contaminant vector towards the nearby 'Shannon River waterbody, which has been designated as poor water quality status by the EPA under the Water Framework Directive (WFD) and is at risk of not achieving good status by 2027.

The objectives of the WFD are to protect all high-status waters, prevent further deterioration of all waters and to restore degraded surface and ground waters to good status by 2027. Specifically, where there is bad or moderate water quality there is the legal imperative to bring that water body up to good status by 2027.

The proposal should be assessed against Article 4 of the WFD to determine whether the project may cause a deterioration of the status of a surface or ground water body or if it may jeopardise the attainment of good surface or ground water status or of good ecological potential and good surface or ground water chemical status. Close consideration should be given to construction phase run off and operational phase foul and surface water run off potential to enter existing drainage ditches.

Response:

Please refer to the Ecological Impact Assessment (ECIA) submitted along with the application documents, which contains the relevant Winter bird survey prepared submitted with the application documents which states the following:

“There are no watercourses within the proposed development site. The closest hydrological features to the proposed development is the Kippinstown Stream (EPA code: 26K74) north of the proposed development which flows north into the Garrynafela River (EPA code: 26G51) and into Lough Ree SAC (000440) and SPA (004064) at Balaghkeeran Bay, approximately 1.6 km from the proposed development site. The Kippinstown Stream is connected to the proposed development site via the drainage ditch northeast of the site (Appendix 1, Figure 9.2). The proposed development site is located within the Athlone gravels (IE-SH-G-246) groundwater body, which has a WFD status of 'Good' and is

currently classified as 'Not at Risk' (EPA, 2025). This groundwater body is shared with the Lough Ree SAC and SPA.”

“The ZoI during the construction, operation, and decommissioning phases, as appropriate, is taken as being the site of the proposed development and downstream aquatic habitats. Potential water quality impacts are primarily associated with the release of sediment and other pollutants during the construction phase. Since site-specific conditions determine the potential for pollutant generation, downstream transport, and any resultant effects, there is no fixed distance applied for the downstream ZoI. While the aquatic zone of potentially highest impact includes receiving waterbodies adjacent to and downstream of the site, extending up to c. 5km, the potential impacts on protected habitats and species throughout the entire downstream sections of any adjoining watercourses were also considered.”

Further mitigation measures are outlined in the Pre-Construction Construction Environmental Management Plan (CEMP) submitted with the application. These include:

- The appointed contractor will engage a qualified ecologist to advise on works undertaken in proximity to drainage features or watercourses.
- Method Statements and Risk Assessments will be prepared and submitted to Westmeath County Council for approval prior to the commencement of works.
- A water quality monitoring programme will be implemented during the construction phase. Monitoring locations and parameters will be agreed with the Planning Authority in advance of works commencing.

In addition, the operational phase drainage design has been developed to ensure that the proposed development will not result in deterioration of water quality in accordance with Article 4 of the Water Framework Directive. Specifically:

- Separate foul and surface water drainage systems will be provided and designed to accommodate peak flows.
- Surface water management infrastructure, including hydrocarbon interceptors, will be incorporated to prevent contaminants entering the storm drainage network.
- The drainage system will be designed to ensure that untreated run-off does not discharge directly to nearby drainage ditches or watercourses.

On this basis, and having regard to the findings of the EclA and the mitigation measures outlined in the CEMP and drainage design, it is considered that the proposed development will not result in deterioration of the status of any surface or groundwater body, nor will it jeopardise the achievement of “Good Status” under Article 4 of the Water Framework Directive.

Signed:



Barry McCann
Executive Architect – Housing Capital
Westmeath County Council

