

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 Development Applications Unit

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 the Development Applications Unit. These matters and concerns will be addressed in a thorough and methodical manner.

Submission:

“A chara

I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Archaeology

The archaeological assessment was carried out by Colm Flynn & Izabela Aptewicz of Horizon Archaeology, dated November 2025, and included the results of a desk based archaeological impact assessment report. The Department concurs with the recommendations in the report and that further archaeological assessment is required in respect of the proposed development. Outlined below are the archaeological recommendations of the Department of Housing, Local Government and Heritage.

It is noted that the proposed development is large in scale and given the scale, extent and location of the proposed development it could impact on subsurface archaeological remains.

In line with national policy, see Section 3.6 of the Frameworks and Principles for the Protection of the Archaeological Heritage 1999, the Department recommends that an Archaeological Impact Assessment, as outlined below, should be prepared to assess any impact on archaeological remains within the proposed development site. This assessment should be submitted as Further Information. This will enable the Planning Authority and this office to prepare an appropriate archaeological recommendation before a planning decision is taken.

Archaeological Investigations

1. The applicant is required to engage the services of a suitably qualified archaeologist to carry out an archaeological assessment of the development site. No sub-surface developmental work, including geotechnical test pits, should be undertaken until the archaeological assessment has been completed and commented on by this office.
2. The archaeologist shall carry out any relevant documentary research and inspect the development site. As part of the assessment a programme of test excavation shall be carried out at locations chosen by the archaeologist (licensed under the National Monuments Acts 1930-2004), having consulted the site drawings and the Department of Housing, Local Government & Heritage.
3. Having completed the work, the archaeologist shall submit a written report stating their recommendations to the Planning Authority and to the Department of Housing, Local Government & Heritage. Where archaeological material/features are shown to be present, preservation in situ, preservation by record (excavation) or monitoring may be required.

Reason: To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.”

Response:

As requested WCC accept and are now engaging in this work process. WCC's consultant (Horizon Archaeology) are being appointed for the compilation of an Archaeology Impact Assessment including the test results of the Archaeological test trenching. We have been informed by Horizon Archaeology that this process can take up to 6month, and would therefore request that the requested work is conditioned in the final decision by An Coimisiún Pleanála.

“Nature Conservation

The Department refers to your correspondence on the 9th December 2025 in relation to the proposed development of 94 no. dwelling units at Cornamaddy, Athlone, Co. Westmeath. This submission is made in the context of this Department's role in relation to nature conservation. The observations are intended to assist An Coimisiún Pleanála in relation to identifying potential impacts on European and national nature conservation sites, biodiversity and environmental protection in general, in the context of the current proposal.

The following observations are provided;

Matters relating to appropriate assessment

The Department notes the potential hydrological connectivity from the proposed development to the Lough Ree SAC (site code: 000440) and the Lough Ree SPA (004064) via drainage channels surrounding the site. These have the potential to transfer suspended sediments and pollutants into the Kippinstown Stream to the north of the site, ultimately connecting with Ballaghkeeran Bay, forming part of the Lough Ree basin. Groundworks and associated construction activities including demolition works, earth moving and cementitious works have significant impact potential on natural watercourses from the release of sediments and pollutants via surface waters and drainage channels. Vulnerable aquatic habitats and protected species can be negatively impacted as a result of poor on-site construction practises and unmitigated activities.

The current WFD River Waterbody status of the hydrological pathway (IE SH 26S021660) has been assessed as Poor (2019-2024) and there is the potential for a further deterioration in water quality during the construction phase of the development in the absence of adequate mitigation. The Department also notes the shared Groundwater Body between the application site and Lough Ree (Athlone Gravels, IE_SH G 246). The Annex I habitat 'Alkaline Fens' [7230] is noted to be located

around Ballaghkeeran Bay - a habitat sensitive to significant changes in groundwater chemistry.

All mitigations as outlined in the Natura Impact Statement (NIS) and Construction & Environmental Management Plan (CEMP) should be strictly adhered to. Prior to commencement of works on site, it is recommended that a suitably qualified person should be appointed to oversee construction phase operations in its entirety in order to prevent residual negative impacts resulting on the Natura 2000 sites listed, including Annex II species and to SCI species under the Birds Directive (2009/147/EC).

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.”

Also please refer to the Pre Construction CEMP submitted along with the application documents where it states:

“The appointed Contractor will engage the services of an Ecologist to advise and instruct how to carry out works in close proximity to the existing water courses. A Method Statement and Risk Assessment will be reviewed and approved by Westmeath County Council before any works take place.”

“Water quality monitoring – It is proposed to implement a programme for monitoring water quality at the outfall as part of the construction of this development, in agreement with the Planning Authority. This programme and locations of sampling will be agreed with Westmeath County Council”

Surface water runoff during the operational phase of the development should be adequately controlled by sufficient attenuation and filtration including hydrocarbon interception. Nature-based SUDS reduces the likelihood of storm-water flooding and pollution events and is coupled with biodiversity net gain. This includes minimisation of kerbing, maximisation of porous ground surfaces, and use of buffer zones, ponds and wetlands as natural flood relief. The Department recommends referral to its guidance document on this subject: Interim Guidance on Best Practice on Nature-based Solutions for the Management of Rainwater and Surface Water Runoff in Urban Areas - Water Sensitive Urban Design¹. Also see guidelines developed by Inland Fisheries Ireland - A Guide to the Protection of Watercourses².”

Response:

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.
- A SUD's design has been incorporated into the proposal in the form of permeable surfaces to all car parking areas within the front curtilage of houses and apartments. In addition, a total of 291 trees are proposed to be planted across the site, which will contribute positively to the sustainable urban drainage network.

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.

"Matters relating to impact assessment

The EclA asserts that while it is intended that those trees and hedgerows of highest ecological value on site are to be retained, some vegetation removal may be necessary and would be replaced elsewhere on site by the planting of native species. However, it is recommended that all potential roost features within the treelines and hedgerows should be retained as a first preference to protect unidentified bats roosts on site and vegetation of higher ecological value that cannot be easily replaced in the short-medium term by replanting alone."

Response:

WCC recognised the ecological importance of the site's trees and hedgerows from the outset, hence the proposed layout wholly maintains the existing hedgerows and trees. The proposal identifies the removal of a section of hedgerow in preparation for the housing developments new site entrance.

Furthermore the tree protection plan included in the Arborist report proposes the removal of trees that are at end of life or are a danger of collapse, for which a plan for limb removal or complete removal has been identified, these works will be carried out as per the EclA recommendations to ensure these works minimise any affects to roosting Bats.

Please refer to the EclA where it states the following:

"The treelines are mature with a diversity of flowering and fruiting species. They provide potential nest and roost sites for birds and bats and movement corridors for mammal species."

"Habitats within the proposed development footprint will be disturbed and lost. Habitat loss will predominantly impact the areas of dry meadow and grassy verge which is primarily considered of moderate botanical diversity, ecological value, and ecosystem functionality. There are also representatives of this habitat in the wider area at the north and west of the proposed development.

*One of the habitats of highest ecological value within the proposed development is the mature tree line, the stand of sessile oaks and the three single oaks in the large field to the west (**Appendix 2, Photograph 9.9**). These oaks will all be retained as will the existing treeline and undergrowth which will be maintained as a wildlife corridor."*

*“Considering the protection afforded to bats and the proposed development site's suitability for roosting/commuting/foraging bats, a precautionary approach has been adopted, with mitigation measures provided in **Section 6.3** below to address any potential impacts on bats. Therefore, despite any short-term effects, disturbance from artificial lighting/noise associated with the construction of the proposed development is unlikely to affect the conservation status of the local bat population and will not result in a significant negative effect at any geographic scale.”*

Also 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.”

The proposed break through of the site entrance is done with much consideration in respect of the loss of habitat. The break through of the site entrance was also considered in relation to the disruption of the wildlife corridor. WCC confirms that the remaining section of wildlife corridors will remain connected to larger zones of corridors and natural habitat. Any new planting of native species of plants and trees will be done so as a compensation for the loss of habitat at the site entrance.

“As species listed under Annex IV of the Habitats Directive (Council Directive 92/43/EEC), all bat species in Ireland are strictly protected under Article 12. If any damage or disturbance to any bat roost subsequently identified on site is envisaged as part of the mitigation works, Westmeath County Council would be required to submit an application under Regulation 54 to apply for a derogation licence. This should process should take place in advance of any formal planning consent from An Coimisiún Pleanála for said works.”

Response:

No evidence of nesting or roosting sites were found on site, however if at any point evidence is found WCC will immediately submit an application for derogation.

“The Department notes evidence of foraging and commuting activity by Badgers within the site, primarily centred towards the northern and eastern boundaries. The EclA refers to prior records of setts located beyond the site boundary in these areas. Whilst any potential sett is assumed to lie outside of the direct development footprint, indirect disturbance and displacement impacts may nevertheless result on badger behaviours as a consequence of construction works in an area previously undisturbed.

It is recommended that badger mitigations should be strictly adhered to, including the observance of the minimum 30m buffer zones as part of Reasonable Avoidance Measures (RAMS). In addition, pre-construction mammal surveys are highly recommended to detect any changes in non-volant mammalian activity on site, including the potential presence of newly-created setts. Where direct disturbance & damage may be envisaged to an active sett, project redesign is highly recommended over necessitating the requirement for the closure of a sett under licence in all but the most exceptional of circumstances. Impacts to main/subsidiary setts can be considered as of a greater significance than outliers. Where other residual impacts resulting from habitat alterations and disturbance are envisaged, appropriate mitigations are recommended under ecological supervision. Consultation with NPWS should be sought in the event of any potential sett closure proposal.”

Response:

No evidence of badger setts were found on site, however if at any point evidence is found WCC will immediately submit an application for derogation. All badger setts are in the Esker to the north and east of the site, the proposed development is outside of any badger sett 30m buffer zone.

“Artificial light at night (ALAN)

Artificial light at night (ALAN) is now recognised as a major threat to biodiversity as artificial light interrupts the natural biological clock for many animal and plant species. Scientific evidence indicates that ALAN, and particularly the glaring bright and blue spectrums of LED lights, have serious negative effects on wildlife and humans. Poorly designed overly bright and inappropriate lighting is all a threat to ecosystem services. There is growing evidence of the importance of protecting existing "dark ecological networks" from light pollution. Many wildlife species are active at dawn and dusk and some are completely nocturnal, these species rely on "dark ecological corridors". Lighting of the development and in particular within the rural environment in an area previously unlit should be avoided, included within the area of broadleaf woodland on site. It is recommended that a lighting plan for the project should take note of guidance from EUROBATS 8, Guidelines for Consideration of Bats in Lighting Projects⁴. The Dark Sky Ireland recommendations⁵ are also highlighted as a source of guidance. The Department notes the inclusion of mitigations in the EclA in relation to bats and artificial lighting. Any proposed bat-friendly lighting should be proven to be effective. Over bright lighting for buildings, housing, or commercial premises can impact habitats and species and will increase light pollution in the area. Lighting with a pronounced blue content such as "cold-white" LEDs significantly increase light pollution on a landscape scale because blue light is more easily distributed in the atmosphere than green and red

To minimise light pollution, it is recommended to;

- Use warmer spectrum (lower CCT (correlated colour temperature) of 2200K (kelvins), i.e. amber lighting which has less environmental intrusion.

Response:

The requirements set out are straightforward but will have significant impact on the design. A revised lighting design update will be required as outlined in our responses below.

The revised design will use 2200K. The output will need to be increased to maintain these lighting levels.

- Lower overall brightness levels. The EU adopted a new "Green Public Procurement Policy" on Road Lighting in 2019, which has limitations on LED white-light.

Response:

A revised lighting design will be submitted as further information. We will address this in the revised design.

- Use low and fully shielded / covered downward-pointing lights, smart sensors and trimming (part-night lighting) schemes. Avoid upward and horizontal facing lighting.

Response:

To satisfy this requirement 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.

- Conserve dark areas, particularly around native vegetation and any areas that may be in use by bats, birds and nocturnal mammals.

Response:

No roosting plan was provided or locations of bat roosts identified in the EclA. Additionally, no bat roosts were discovered during the Bat survey on site. A revised lighting design proposal will be prepared in coordination with the Ecologist to ensure that this requirement is fully addressed.

The LED standard which is often used, is 3000K (kelvins) CCT (correlated colour temperature), however, this standard may be excessively bright. Where possible, the Department recommends the use of LEDs of a warm spectrum lighting (lower CCT of below 2700K, ideally, 2200K), i.e. amber coloured lighting, for reduced environmental intrusion, and more pleasant night time spaces.”

Response:

The revised design will use 2200K. Please note the power output will need to be increased to maintain light levels.

Signed:



Barry McCann
Executive Architect – Housing Capital
Westmeath County Council

