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By Email & Post:

Case file: ACP- 323932-25

AN COIMISIÚN PLEANÁLA	
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ACP- _____	
10 MAR 2026	
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Time: 9:15	By: Recy post

06/03/2026

Re: Part 10 Planning – Response to observations from notified bodies

Pursuant to the requirements of Section 1 77AE(4)(a) of the Planning and Development Act 2000 (as amended).

Part X for the Development of 94 no. dwelling units at (Cornamaddy, Athlone) lands 150m north of the N55, Lissywollen Td., Athlone, co. Westmeath

We refer to your letter dated 12th February and the enclosed submissions / observations from the notified bodies in respect to the above mentioned part 10 planning application, and your email dated 4th March granting the time extension of time until 12th March 2026, and we hereby now enclose / attach the responses to the observations from the notified bodies.

These include:

1. Response to An Taisce
2. Response to the Development Applications Unit
3. Response Uisce Éireann

We also acknowledge the letters from the following bodies, that communicated that they had no observations in relation the planning application:

4. Health and Safety Authority
5. Transport Infrastructure Ireland – Land use planning unit

Yours sincerely,



Barry McCann
Executive Architect, MRIAI
Capital Housing Design team
Westmeath County Council

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.commutetimemap.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.

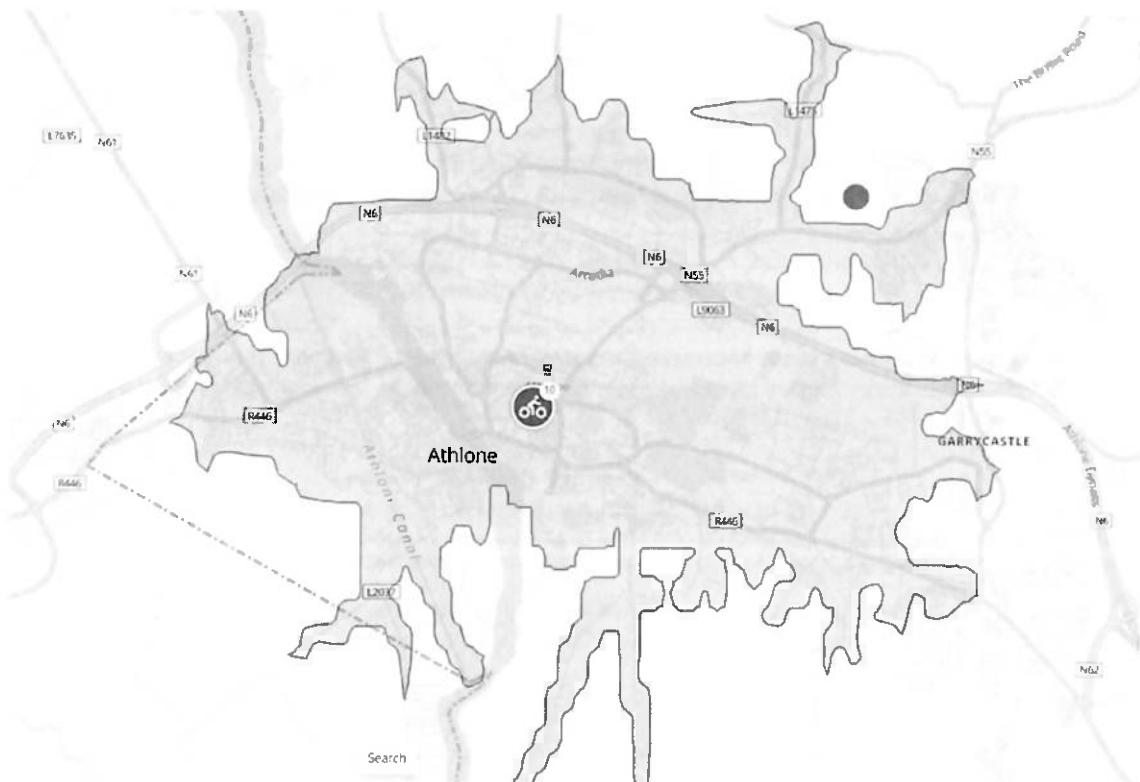


Fig 1- 10 minute Cycle distance, Source : commutetimemap.com

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.

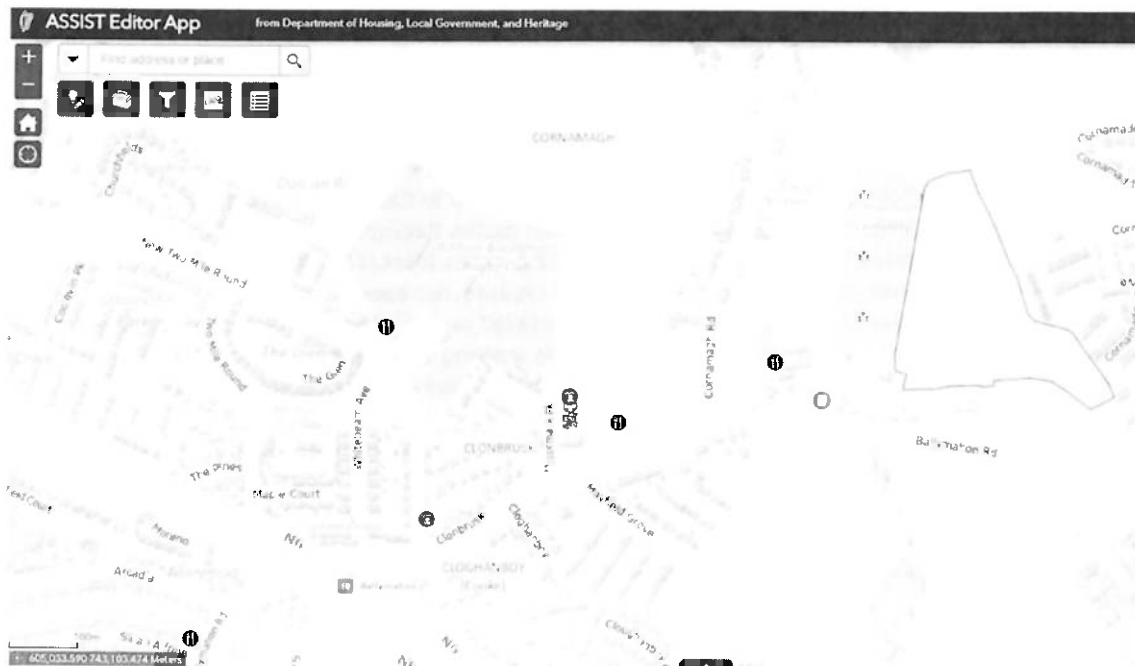


Fig 2 - location of local services in close proximity to the site, Source: Assist Editor App

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.⁴ 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 and 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 field 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 Garrnafela 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 Zol 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 Zol. 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:

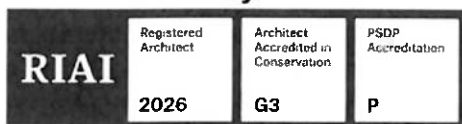
- Separate foul and surface water drainage systems will be provided and designed to accommodate peak flows.
- Surface water management infrastructure, including hydrocarbon interceptors, will be incorporated to prevent contaminants entering the storm drainage network.
- The drainage system will be designed 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



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 Zol 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 Zol. 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."

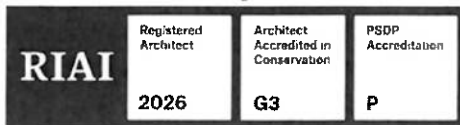
Response:

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



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 Uisce Éireann

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 Uisce Éireann. These matters and concerns will be addressed in a thorough and methodical manner.

Submission:

A Chara,

Uisce Éireann (UÉ) has reviewed the plans and particulars submitted with the application and has the following observations;

The applicant has engaged with Uisce Éireann via a Pre-Connection Enquiry (our ref. CDS24008612) and Uisce Éireann can confirm that a Confirmation of Feasibility has been issued to the applicant advising that a water connection is feasible subject to upgrades and that a wastewater connection is feasible subject to land access. agreements.

Uisce Éireann respectfully requests any grant of permission be conditioned as follows;

1. The applicant shall enter into a Connection Agreement with Uisce Éireann to provide for service connections to the public water supply and wastewater collection network and adhere to the standards and conditions set out in that agreement.

Response:

Westmeath county Council are committed to working with Uisce Éireann and entering into a connection agreement with Uisce Éireann to provide service connections for public water supply and wastewater collection network and adhere to the standards and conditions set out in that agreement.

2. The applicant / developer shall fund the extension of the potable water network required to provide a connection to the proposed development - approximately 210 metres of 150mm diameter watermain - in accordance with the particulars of the Connection Agreement.

Response:

Westmeath county Council are committed to fund the extension of the potable water network required to provide a connection to the proposed development - approximately 210 metres of 150mm diameter watermain - in accordance with the particulars of the Connection Agreement.

3. The Uisce Éireann owned foul network is located in private lands to the Northwest of the proposed development site. Prior to commencement, the applicant shall secure permission from the private land owner to allow for the connection works to be undertaken by Uisce Éireann contractors.

Response:

Westmeath county Council are committed to secure permission from the private landowner to allow for the connection works to be undertaken by Uisce Éireann contractors.

4. The applicant shall obtain any permissions/consents and wayleaves for the connection pipework within third party lands.

Response:

Westmeath county Council are committed to obtaining any permissions/consents and wayleaves for the connection pipework within third party lands.

5. All development shall be carried out in compliance with Uisce Éireann's Standard Details and Codes of Practice.

Response:

Westmeath county Council have obtained the latest standard details and code of practice to ensure that the proposed development shall be carried out in compliance with Uisce Éireann's Standard Details and Codes of Practice.

6. Uisce Éireann does not permit Build Over of its assets. Where the applicant proposes to build over or divert existing water or wastewater sentences the applicant shall have received written Confirmation of Feasibility (COF) of Diversion(s) from Uisce Éireann prior to any works commencing.

Response:

Westmeath county Council will notify Uisce Éireann of any existing water or waste water services found during the period of the work and obtain a written confirmation of feasibility (COF) of diversion(s) from Uisce Éireann prior to any works commencing.

To ensure adequate provision and protection of water and wastewater facilities, Uisce Éireann recommends the following;

1. Where the applicant seeks a connection to the public network, the applicant shall enter into a connection agreement with Uisce Éireann prior to the commencement of the development and adhere to the standards and conditions set out in that agreement.
2. There shall be no build over of public infrastructure from these proposals. Separation distances as per Uisce Éireann's Standards Codes & Practices shall be achieved where public infrastructure is in situ within and/or adjacent to site boundaries*
3. The development shall not impact public drinking water sources and/or abstraction point(s) and/or abstraction infrastructure**
4. The design and construction of the Water & Wastewater pipes and related infrastructure to be installed in this Development shall comply with the Uisce Éireann Connections and Developer Services Standard Details and Codes of Practice.

Response:

Westmeath county Council are committed to working with Uisce Éireann and complying with all of the requirements raised above.

Signed:



Barry McCann

Executive Architect – Housing Capital

Westmeath County Council

